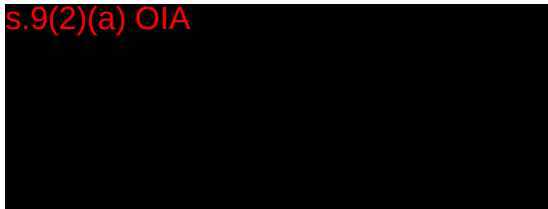


16 September 2024

IR-01-24-21954

s.9(2)(a) OIA



Thank you for your Official Information Act 1982 (OIA) request dated 24 June 2024 and further refinement of your request on 4 July 2024. You requested:

All reports, submissions, aide memoire, emails, analysis, correspondence and communications on any platform, sent, held or received by NZ Police in relation Plans to Rewrite the Arms Act 1983. Plans to transfer responsibility for the Arms Act 1983 to the Ministry of Justice. Plans to transfer the Firearms Safety Authority to another department. Plans to review whether the Firearms Registry is effectively improving public safety. Plans to repeal and replace Part 6 of the Arms Act 1983 relating to clubs and ranges. This request excludes matters of administration and logistics relates only to matters of policy substance.

Thank you for your patience while Te Tari Pūreke prepared the documents for you.

Please see attached two document bundles as follows:

- Bundle One: Firearms reforms original reviewed (2023 to March 2024)
- Bundle Two: Firearms reforms (March to July 2024)

Some information from these documents have been withheld under the following sections of the OIA:

- 6(c), where making available the information would be likely to prejudice the maintenance of the law, including the prevention, investigation, and detection of offences, and the right to a fair trial
- 9(2)(a), to protect the privacy of natural persons
- 9(2)(f)(iv), to maintain the constitutional conventions for the time being which protect the confidentiality of advice tendered by Ministers of the Crown and officials
- 9(2)(g)(i), to maintain the effective conduct of public affairs through the free and frank expression of opinions
- 9(2)(g)(ii), to maintain the effective conduct of public affairs through the protection of employees from improper pressure or harassment
- 9(2)(h), to maintain legal professional privilege.

Police considers the interests requiring protection by withholding the information are not outweighed by any public interest in release of the information.

Please note that some of the information identified in scope of your request is not held by Police but is held by the Office of the Minister of Police. Specifically, these relate to eight Ministerial briefings and aide memoires on firearms reforms. On 9 September 2024, Police transferred that part of your request to the Office of the Minister of Police under section 14 of the OIA. You will receive a response from the Office of the Minister of Police in due course.

For additional context regarding firearms reforms, please refer to the proactively released documents relating to the establishment of Te Tari Pūreke, accessible through the below website link:

[Proactive release of information about the establishment of Te Tari Pūreke | New Zealand Police](#)

Please also refer to the Ministry of Justice's proactive release of cabinet material relating to the Firearms reform programme, accessible through the below website link:

[Proactive-release-firearms-reform-programme FINAL-v2.pdf \(justice.govt.nz\)](#)

You have the right to ask the Ombudsman to review this decision if you are not satisfied with the response to your request. Information about how to make a complaint is available at: www.ombudsman.parliament.nz.

For your information, Police has developed a process for proactive release of information, so the anonymised response to your request may be publicly released on the New Zealand Police website.

Nāku noa, nā



Matthew Boddy

Acting Director Operations
Firearms Safety Authority

s.9(2)(g)(ii)

From: s.9(2)(g)(ii)
Sent: Monday, 11 December 2023 11:55 am
To: TTP.OpPolicy
Subject: RE: Possible addition for Arms Act review FW: Attn; Jess. Question around supplying a non-prohibited part

Hi Jess,

And on this one – yeah that all sounds about right. While I haven't looked back through old documents to confirm the intent s. 9(2)(f)(iv)

In the Act review there will definitely need to be a process to reach a preferred position and improve consistency. I'll check that the requirements for parts are one of the example issues on the list.

Cheers,

From: TTP.OpPolicy <TTP.OpPolicy@police.govt.nz>
Sent: Friday, 24 November 2023 9:38 AM
To: s.9(2)(g)(ii)
Subject: Possible addition for Arms Act review FW: Attn; s.9(2)(g)(ii). Question around supplying a non-prohibited part

Hi

I have a possible addition for the Arms Act review, but would also love to know if the current legislation is intentional and no change needed.

- s. 9(2)(f)(iv)

- s. 9(2)(f)(iv)

- s. 9(2)(f)(iv)

- s. 9(2)(f)(iv)

s. 9(2)(f)(iv)

Ngā mihi maioha

s9(2)(g)(ii) OIA

Operational Policy Lead

M s.9(2)(a) OIA
E s.9(2)(g)(ii) OIA

WARNING

The information contained in this email message is intended for the addressee only and may contain **privileged and confidential information**. It may also be subject to the provisions of section 50 of the Policing Act 2008, which creates an offence to have unlawful possession of Police property. If you are not the intended recipient of this message or have received this message in error, you must not peruse, use, distribute or copy this message or any of its contents. Also note, the views expressed in this message may not necessarily reflect those of the New Zealand Police. If you have received this message in error, please email or telephone the sender immediately.

□

From: s.9(2)(g)(ii) [REDACTED]
Sent: Wednesday, 22 November 2023 9:23 am
To: TTP.OpPolicy <TTP.OpPolicy@police.govt.nz>
Subject: Attn; Jess. Question around supplying a non-prohibited part

Hi Jess regarding our earlier conversation.

s9(2)(f)(iv) OIA [REDACTED]

s. 9(2)(f)(iv) [REDACTED]

Ngā mihi nui

s.9(2)(g)(ii) [REDACTED]

Arms Supervisor

Registry & Services Team 5

PNHQ

M s.9(2)(a) OIA [REDACTED]

E s.9(2)(g)(ii) [REDACTED]

□

s. 9(2)(f)(iv)

RELEASED UNDER THE OFFICIAL INFORMATION ACT

s. 9(2)(f)(iv)

RELEASED UNDER THE OFFICIAL INFORMATION ACT

s. 9(2)(f)(iv)

RELEASED UNDER THE OFFICIAL INFORMATION ACT

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s. 9(2)(f)(iv)

RELEASED UNDER THE OFFICIAL INFORMATION ACT

s. 9(2)(f)(iv)

RELEASED UNDER THE OFFICIAL INFORMATION ACT

From: SEARANCE, Laura
To: MANSELL, Angela; WHITE, John; s9(2)(g)(ii) OIA
Richard (RJ); BODDY, Matthew (Matt); HANLON, Phil; CARSE, David (Scott); MCILRAITH, Michael (Mike)
Cc: SMIT, Martin
Subject: Prioritised amendments to advise Minister
Date: Tuesday, 16 January 2024 11:54:16 AM
Attachments: [Memo - Legislation and Regulation amendment options for consideration JAN24 \(002\).docx](#)
[image001.png](#)

s9(2)(f)(iv) OIA

[redacted] OIA

[redacted]

RELEASED UNDER THE OFFICIAL INFORMATION ACT

s. 9(2)(f)(iv)

RELEASED UNDER THE OFFICIAL INFORMATION ACT

s. 9(2)(f)(iv)

RELEASED UNDER THE OFFICIAL INFORMATION ACT

s. 9(2)(f)(iv)

RELEASED UNDER THE OFFICIAL INFORMATION ACT

From: [MANSELL, Angela](#)
To: [WHITE, John](#); [MERCER, s9\(2\)\(g\)\(ii\) OIA](#)
Cc: [SEARANCKE, Laura](#); [CARSE, David \(Scott\)](#)
Subject: Legislative amendment priorities - Firearms Safety Authority
Date: Wednesday, 10 January 2024 9:52:10 am
Attachments: [Legislative amendment priorities - Firearms Safety Authority.docx](#)

Morena John and [s9\(2\)\(g\)\(ii\) OIA](#)

In relation to our meeting at 10.30am, attached is a list of leg amendments prioritised from our regulatory/operational perspective and agreed with our ALT. I'd like to walk through this with you and Nick in case it needs to be rethought.

Minister McKee asked Angela directly for an FSA overview of leg amendments. I'm keen to discuss how to navigate this request and position ourselves helpfully given the MoJ briefings and timeframes.

In our focus we have three areas we'd like to provide very high-level advice on:

[s9\(2\)\(f\)\(iv\) OIA](#)



Happy to talk through these options and our approach.

Rgds

A

Te Tari Pūreke | Firearms Safety Authority

□

From: EVANS, Jonathan <Jonathan.Evans2@police.govt.nz>

Sent: Wednesday, 17 January 2024 1:32 pm

To: BRAZIER, Angela <Angela.Brazier@police.govt.nz>; WHITE, John <John.White@police.govt.nz>; SMIT, Martin <Martin.Smit2@police.govt.nz>; s.9(2)(g)(ii)

Cc: WOOD, Jeremy <Jeremy.Wood@police.govt.nz>; HODGSON, Lee <Lee.Hodgson@police.govt.nz>; LEGGETT, Tracy-Leigh <Tracy-Leigh.Leggett@police.govt.nz>; CAMERON, Louise <Louise.Cameron@police.govt.nz>; ROTH, Tanya <Tanya.Roth@police.govt.nz>

Subject: FW: [EXTERNAL] Pausing commissioning on costs of transfer of TTP

Kia ora koutou,

As I believe you are aware, this briefing has been paused until later in the year. I understand you are already in contact with the relevant people in Justice and can provide anything they require at the appropriate time.

Thanks for all of the work that has gone into it so far.

Ngā mihi,

Jonathan

□

From: s.9(2)(a) OIA

Sent: Wednesday, 17 January 2024 1:04 pm

To: LEGGETT, Tracy-Leigh <Tracy-Leigh.Leggett@police.govt.nz>; EVANS, Jonathan <Jonathan.Evans2@police.govt.nz>

Cc: WOOD, Jeremy <Jeremy.Wood@police.govt.nz>; s.9(2)(a) OIA
HODGSON, Lee <Lee.Hodgson@police.govt.nz>

Subject: [EXTERNAL] Pausing commissioning on costs of transfer of TTP

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

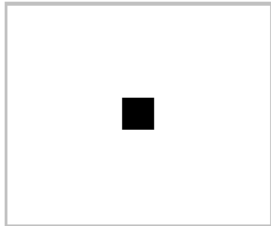
Kia ora All

Off the back of a meeting on Tuesday, [REDACTED] s.9(2)(g)(ii) has confirmed that current requests for advice on the costs of the transfer of Te Tari Pūreke can be put on hold for now, feeding into more comprehensive advice the Ministry of Justice is likely to provide later in the year.

Could the change in prioritisation of this piece of work please be passed on to Te Tari Pūreke

Ngā mihi,

[REDACTED] s.9(2)(a) OIA



[REDACTED] s.9(2)(a) OIA

[REDACTED] s.9(2)(a) OIA | Office of Hon Mark Mitchell
Minister of Police | Minister of Corrections
Minister for Emergency Management and Recovery

[REDACTED] s.9(2)(a) OIA

[REDACTED] Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

[]

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WARNING

The information contained in this email message is intended for the addressee only and may contain privileged information. It may also be subject to the provisions of section 50 of the Policing Act 2008, which creates an offence to have unlawful possession of Police property. If you are not the intended recipient of this message or have received this message in error, you must not peruse, use, distribute or copy this message or any of its contents.

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Firearms regulatory functions subject to transfer from New Zealand Police

1) What was the original rationale for setting up the FSA?



Firearms regulatory functions subject to transfer from New Zealand Police

- 2) What are the current firearms regulatory functions undertaken by FSA, NZP or in collaboration?
- 3) What are the options and trade-offs as it relates to transferring all or part of FSA to another government agency?
- 4) How might these changes impact on achieving our strategic outcomes, and ensuring regulatory best practice for the firearms system, including how compliance and enforcement activities are undertaken?

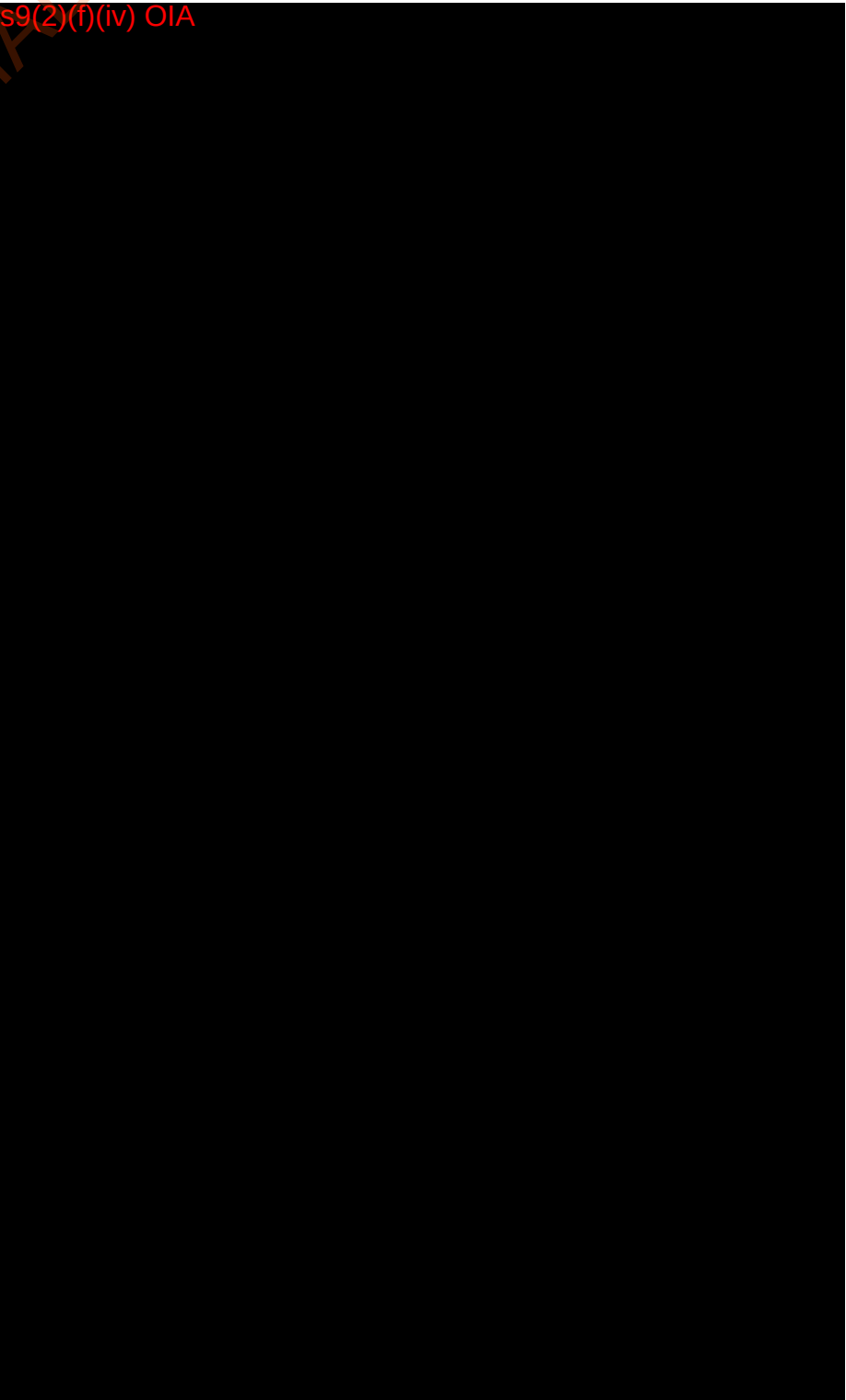
Key Insights

- The functions of relevance to any potential transfer of the FSA out of NZP can be broken down into four categories:
 - Regulatory Functions** – these form the basis of our operational service delivery, most of which are strongly linked to roles, responsibilities and powers within the Arms Act 1983
 - Police Core Functions and Capability** – these consist of the broader suite of functions and capabilities in the wider police, as they relate to the Firearms System as a whole (i.e., beyond the Arms Act 1983)
 - Policy Functions (excluding overall administration)** – these relate to a few policy responsibilities that remain tied to NZP and the Minister of Police according to the Arms Act 1983
 - Enabling Functions** – these refer to all strategic and support functions, some of which have dedicated capacity and capability within FSA, and others relying on access through service level agreements along with key points of contact within FSA
- The Arms Act 1983, and the functions and powers it represents, makes at least **157 references** to either the Commissioner of Police, Member of the Police, Commissioned officer of the Police, or Minister of Police.



Regulatory Functions

Function	Description	No. of NZP References in Arms Act
Licensing & Endorsements	- Applications - Vetting and interviews - Security checks - Fit and proper assessment - Issuing	36
Clubs & Ranges	- Applications & Certification - Inspections & Improvement Notices	19
Imports & Manufacture	- Permits to Import - Permits to Procure	18
Border Controls	- Temporary craft visiting NZ - Seizure of illegal imports	7
Registry	- Operation of the Registry - Content requirements - Direct data access - Frontline access - Phone support	6
Compliance Monitoring (Individuals)	- Continuous Eligibility Scanning - Compliance Visits - Change of Address - Expired / Deceased - Unsafe Firearms - Registry Obligations	10
Compliance Monitoring (Dealers)	- Inspections - Recordkeeping compliance - Storage conditions	13
Resolutions – Licenses	- Health Practitioner Reporting - Conditions - Improvement Notices - Temporary Suspension - Revocation - Decision Reviews & Appeals	27
Resolutions – Firearms Items	- Seizures - Surrenders - Safe Keeping	5
Education & Engagement	- Partnerships & Engagements - Education & Guidance - Safety Training & Promotion	3
Digital Support & Transformation	- Digital transformation and enablement - Digital support for regulated parties	-



Police Core Functions and Capability

Function	Description	No. of NZP References in Arms Act
Police Enforcement	• Criminal investigations & resolutions for firearms-related use, supply & possession • Burglary / theft • Reporting of firearms-related injury or death • Firearms Prohibition Orders	5
Firearms Property & Exhibits Management	• Seizure storage & exhibits • Tier 1 & 2 Sites • Destruction / disposal • Loss & theft of firearms	5
Response	• Emergency Management • Firearms-related incidents • AOS & Negotiating Teams • Deployment to MOCs	-
Information & Channel Management	• FMCs • 111 & 105 • Front Counter & other public channels • Police Systems (e.g., CARD / NIA)	-
Prevention	• Iwi & Communities	-
Intelligence & Risk Profiling	• Armoury • Operational/Tactical Intelligence • Strategic Intelligence • Information Sharing • Utilising enhanced vetting	-
Dispute Resolution	• Integrity and Professional Conduct	-

Policy Functions (excluding overall administration)

Function	Description	No. of NZP References in Arms Act
Fee & Cost Recovery	• Cost recovery & consultation • Payments & refunds	5
Other Powers specific to Commissioner of Police	• Power to declare weapons to be restricted weapons or specially dangerous airguns • Delegation powers (no less than Inspector level) • Operations of MAAG	4
Other Powers specific to Minister of Police	• Recommendations to the Governor General regarding amendments and transitional matters • Establishment of MAAG and removal of members	4

Enabling Functions

Function	Description	No. of NZP References in Arms Act
Strategy, Service Improvement & Insights	• Strategy & Planning • System Performance • Service Improvement • Performance & Insights • Operational Policy • Learning & Development	-
Governance, Min Services & Strategic Comms	• Governance and support • Ministerial services (incl., OIAs & PQs) • Brand, media, and comms	-
ICT	• Service Portal / Hub • ICT troubleshooting	-
Legal	• Legal Services / Advice • Arms Appeals • Civil Litigation	-
Finance	• Corporate Finance • Accounts • External Reporting • Asset / Financial Risk Management	-
Property & Fleet	• Property & Management • Fleet Management & Repair	-
Human Resources and Payroll	• Recruitment • Advisory • Workforce Planning • Staff Development • Negotiations	-
Health, Safety and Wellness	• Safer People • Advisory • Rehabilitation Programmes / EAP • Employment Relations	-

s9(2)(f)(iv) OIA

RELEASED UNDER THE OFFICIAL INFORMATION ACT

From: s.9(2)(g)(ii)
To: s.9(2)(g)(ii)
Subject: FW: Briefing to Minister on FSA Entity structures
Date: Tuesday, 19 March 2024 5:02:33 pm
Attachments: [image001.png](#)

From: SMIT, Martin <Martin.Smit2@police.govt.nz>
Sent: Monday, 8 January 2024 10:59 am
To: s.9(2)(g)(ii)
Cc: WHITE, John <John.White@police.govt.nz>
Subject: RE: Briefing to Minister on FSA Entity structures

Hi s.9(2)(g)(ii)

I think all three options will require legislative change to the Arms Act and potentially the Policing Act.

s.9(2)(f)(iv) OIA

Thanks,
Martin

Martin Smit

□

From: s.9(2)(g)(ii)
Sent: Monday, 8 January 2024 10:29 AM
To: SMIT, Martin <Martin.Smit2@police.govt.nz>
Cc: WHITE, John <John.White@police.govt.nz>
Subject: RE: Briefing to Minister on FSA Entity structures

I think it would also be useful to know what the three options are that you are modelling. I assume that some of these will have legislation implications.

From: SMIT, Martin <Martin.Smit2@police.govt.nz>
Sent: Monday, 8 January 2024 9:52 am
To: s.9(2)(g)(ii)
Cc: WHITE, John <John.White@police.govt.nz>
Subject: RE: Briefing to Minister on FSA Entity structures

Hi s.9(2)(g)(ii)/John,

Majority of the focus this week will be to develop the financial model that underpins this, so I have meetings scheduled with the programme team, Finance and ICT to populate this. I've scheduled a workshop with ALT for next week to walk them through it, s.9(2)(g)(ii) I wonder if it will be more valuable to have you attend that meeting? We will be developing an A3 that summarises the options against each other with a short briefing paper over the top, I think max 2 pages,

where we will reference the fact that Deloitte's provided some estimates for some of these options back in 2020 as part of the IBC that Cabinet considered. We might also want to highlight in the appendix the options that Cabinet considered at the time of the IBC that informed the scope of the DBC.

John - I will give you a call today to discuss.

Thanks,
Martin

Martin Smit
□

From: s.9(2)(g)(ii)
Sent: Monday, 8 January 2024 9:42 AM
To: SMIT, Martin <Martin.Smit2@police.govt.nz>
Cc: WHITE, John <John.White@police.govt.nz>
Subject: RE: Briefing to Minister on FSA Entity structures

Hi Martin,
Could you please discuss this with John as my line manager?
If I am going to be involved in briefing, it would be useful to be involved in the workshops too.
Thank you
s.9(2)(g)(ii)

From: SMIT, Martin <Martin.Smit2@police.govt.nz>
Sent: Thursday, 21 December 2023 2:52 pm
To: DL_FirearmsALT <DL_FirearmsALT@police.govt.nz>; s.9(2)(g)(ii)
s.9(2)(g)(ii)
WINTER, Matthew (Matt) <Matthew.Winter@police.govt.nz>; CAMERON, Louise <Louise.Cameron@police.govt.nz>; LAPLANCHE, Paul <Paul.Laplanche@police.govt.nz>
Subject: Briefing to Minister on FSA Entity structures

Good afternoon everyone,

As most of you will be aware the Commissioner discussed with the MoP yesterday the transition of FSA to another Host agency and the Minister asked for an indication of costs for moving the FSA. There are several ways this could be achieved with varying cost profiles. I have started with the development of the financial model to cost this out and hope to have it all in working order by the 8th January.

I've put the below schedule together to ensure we can meet the deadline for the week of the 22nd Jan and have started to schedule in some of the workshops.

Week 1 Activities:

Mon 8 th Jan	Tue 9 th Jan	Wed 10 th Jan	Thur 11 th Jan	Fri 12 th Jan
• Meet with	• Workshop	• Workshop	• Workshop	• Workshop

Finance & Strategic Finance (Booked) Update Financial Model – Option 1	with Programme team on Transition effort – Option 1 & Option 2 (Booked)	with ICT team on Transition effort – Option 1 & Option 2 (TBC)	with Programme team on Transition effort – Option 3 (Booked)	with ICT team on Transition effort – Option 3 (TBC) Meet with People & Culture to understand People impact (Booked)
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Week 2 Activities:

Mon 15 th Jan	Tue 16 th Jan	Wed 17 th Jan	Thur 18 th Jan	Fri 19 th Jan
Update and refine Model	Update and refine Model	Workshop with ALT (TBC)	- Draft Summary A3 – [REDACTED] - Draft Short Briefing – [REDACTED]	

Week 3 Activities:

Mon 22 nd Jan	Tue 23 rd Jan	Wed 24 th Jan	Thur 25 th Jan	Fri 26 th Jan
- Present to ALT final briefing and A3 (TBC) - Apply any updates	Executive Sign-off		Submit Briefing to Minister's Office	

Linda do you mind setting up some time for me to workshop this with ALT as outlined above, will most likely need 4 hours.

Matt – I will send invites through as soon as I hear back from you on who the right people will be from ICT to support me with this.

Many thanks,
Martin

Martin Smit
Programme Integration and Assurance Manager

Te Tari Pūreke | Firearms Safety Authority

s.9(2)(a) OIA

martin.smit2@police.govt.nz

□



From: [BRAZIER, Angela](#)
To: [COSTER, Andrew](#)
Cc: [MCSKIMMING, Jevon](#); [LEGGETT, Tracy-Leigh](#); [EVANS, Jonathan](#); [HANLON, Phil](#); [MANSELL, Angela](#); [MCILRAITH, Michael \(Mike\)](#); [SMIT, Martin](#); [WILSON, Richard \(RJ\)](#); [WOOD, Linda](#)
Subject: BRIEFING FOR THE MINISTER OF POLICE- INFORMATION FOR NICOLE MCKEE
Date: Tuesday, 12 December 2023 5:14:22 PM
Attachments: [BRIEFING FOR THE MINISTER OF POLICE- INFORMATION FOR NICOLE MCKEE .docx](#)
[Appendix 1 High level indicative scope to transition FSA out of NZP.pdf](#)
[Appendix 2 FSA - Indicative High level Roadmap.pdf](#)
Importance: High

Hi Commissioner,

Please find attached a short briefing to the MoP in response to yesterday's meeting with Minister McKee. The paper is our response to a number of request for information and we're asking the MoP to onforward to Minister McKee.

If you're comfortable with the briefing and attachments please forward your approval to Min Services so they can get it off to the MoP.

Thanks

A

Te Tari Pūreke | Firearms Safety Authority

□

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WINTER, Matthew (Matt) <Matthew.Winter@police.govt.nz>; CAMERON, Louise
<Louise.Cameron@police.govt.nz>; LAPLANCHE, Paul <Paul.Laplanche@police.govt.nz>
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Martin Smit
Programme Integration and Assurance Manager

Te Tari Pūreke | Firearms Safety Authority

s.9(2)(a) OIA [REDACTED]
E martin.smit2@police.govt.nz

□



From: [BRAZIER, Angela](#)
To: [WOOD, Jeremy](#)
Cc: [SMIT, Martin](#); [MCSKIMMING, Jevon](#); [WOOD, Linda](#); [s.9\(2\)\(g\)\(ii\)](#); [HANLON, Phil](#); [MANSELL, Angela](#); [MCILRAITH, Michael \(Mike\)](#); [WILSON, Richard \(RJ\)](#)
Subject: FW: [EXTERNAL] Pausing commissioning on costs of transfer of TTP
Date: Wednesday, 31 January 2024 10:29:24 am
Attachments: [image001.jpg](#)
[240117-FSAOptionsForAFutureLocation-04.pdf](#)

Hi Jeremy,

Attached is the document that the Commissioner wants to get to the MoP. From memory [s.9\(2\)\(g\)\(ii\)](#) had started to prepare a briefing at the point when we were asked to pause on this work so it may be worth checking in with her as to how far she got with the briefing.

Please sing out if there is anything further you need from me.

Thanks

A

Te Tari Pūreke | Firearms Safety Authority
□

From: BRAZIER, Angela
Sent: Thursday, 18 January 2024 9:14 am
To: COSTER, Andrew <Andrew.Coster@police.govt.nz>; MCSKIMMING, Jevon <Jevon.McSkimming2@police.govt.nz>; WOOD, Jeremy <Jeremy.Wood@police.govt.nz>
Cc: [s.9\(2\)\(g\)\(ii\)](#); WHITE, John <John.White@police.govt.nz>; HANLON, Phil <Phil.Hanlon@police.govt.nz>; MANSELL, Angela <Angela.Mansell@police.govt.nz>; MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>; SMIT, Martin <Martin.Smit2@police.govt.nz>; WILSON, Richard (RJ) <Richard.Wilson@Police.Govt.NZ>; WOOD, Linda <Linda.Wood@police.govt.nz>
Subject: FW: [EXTERNAL] Pausing commissioning on costs of transfer of TTP

Good morning Gents,

Given the machinery of government complexities it's been requested that we pause our response to MoP's request for indicative costs to transfer FSA.

In preparation for the briefing, we prepared the attached A3 which sets out three options for moving FSA. There are further permutations however these three options give a good indication of small, medium and large scale/cost options.

[s9\(2\)\(g\)\(i\)OIA](#)

Thanks to Martin and [s.9\(2\)\(g\)\(ii\)](#) for their excellent work to date on this and a number of briefings they've worked on together. There is also a detailed costing model underpinning the cost estimates so we can justify how the estimates were calculated.

Happy to talk through these options and our approach.

Rgds

A

Te Tari Pūreke | Firearms Safety Authority

□

From: EVANS, Jonathan <Jonathan.Evans2@police.govt.nz>

Sent: Wednesday, 17 January 2024 1:32 pm

To: BRAZIER, Angela <Angela.Brazier@police.govt.nz>; WHITE, John <John.White@police.govt.nz>; SMIT, Martin <Martin.Smit2@police.govt.nz>; s.9(2)(g)(ii)

Cc: WOOD, Jeremy <Jeremy.Wood@police.govt.nz>; HODGSON, Lee <Lee.Hodgson@police.govt.nz>; s.9(2)(g)(ii)

CAMERON, Louise <Louise.Cameron@police.govt.nz>; ROTH, Tanya <Tanya.Roth@police.govt.nz>

Subject: FW: [EXTERNAL] Pausing commissioning on costs of transfer of TTP

Kia ora koutou,

As I believe you are aware, this briefing has been paused until later in the year. I understand you are already in contact with the relevant people in Justice and can provide anything they require at the appropriate time.

Thanks for all of the work that has gone into it so far.

Ngā mihi,

Jonathan

□

From: s.9(2)(a) OIA

Sent: Wednesday, 17 January 2024 1:04 pm

To: LEGGETT, Tracy-Leigh <Tracy-Leigh.Leggett@police.govt.nz>; EVANS, Jonathan <Jonathan.Evans2@police.govt.nz>

Cc: WOOD, Jeremy <Jeremy.Wood@police.govt.nz>; s.9(2)(a) OIA
HODGSON, Lee <Lee.Hodgson@police.govt.nz>

Subject: [EXTERNAL] Pausing commissioning on costs of transfer of TTP

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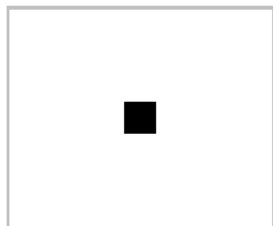
Kia ora All

Off the back of a meeting on Tuesday, [REDACTED] s.9(2)(g)(ii) has confirmed that current requests for advice on the costs of the transfer of Te Tari Pūreke can be put on hold for now, feeding into more comprehensive advice the Ministry of Justice is likely to provide later in the year.

Could the change in prioritisation of this piece of work please be passed on to Te Tari Pūreke

Ngā mihi,

[REDACTED] s.9(2)(a) OIA



[REDACTED] s.9(2)(a) OIA

[REDACTED] s.9(2)(a) OIA | Office of Hon Mark Mitchell
Minister of Police | Minister of Corrections
Minister for Emergency Management and Recovery

[REDACTED] s.9(2)(a) OIA

[REDACTED] Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

[]

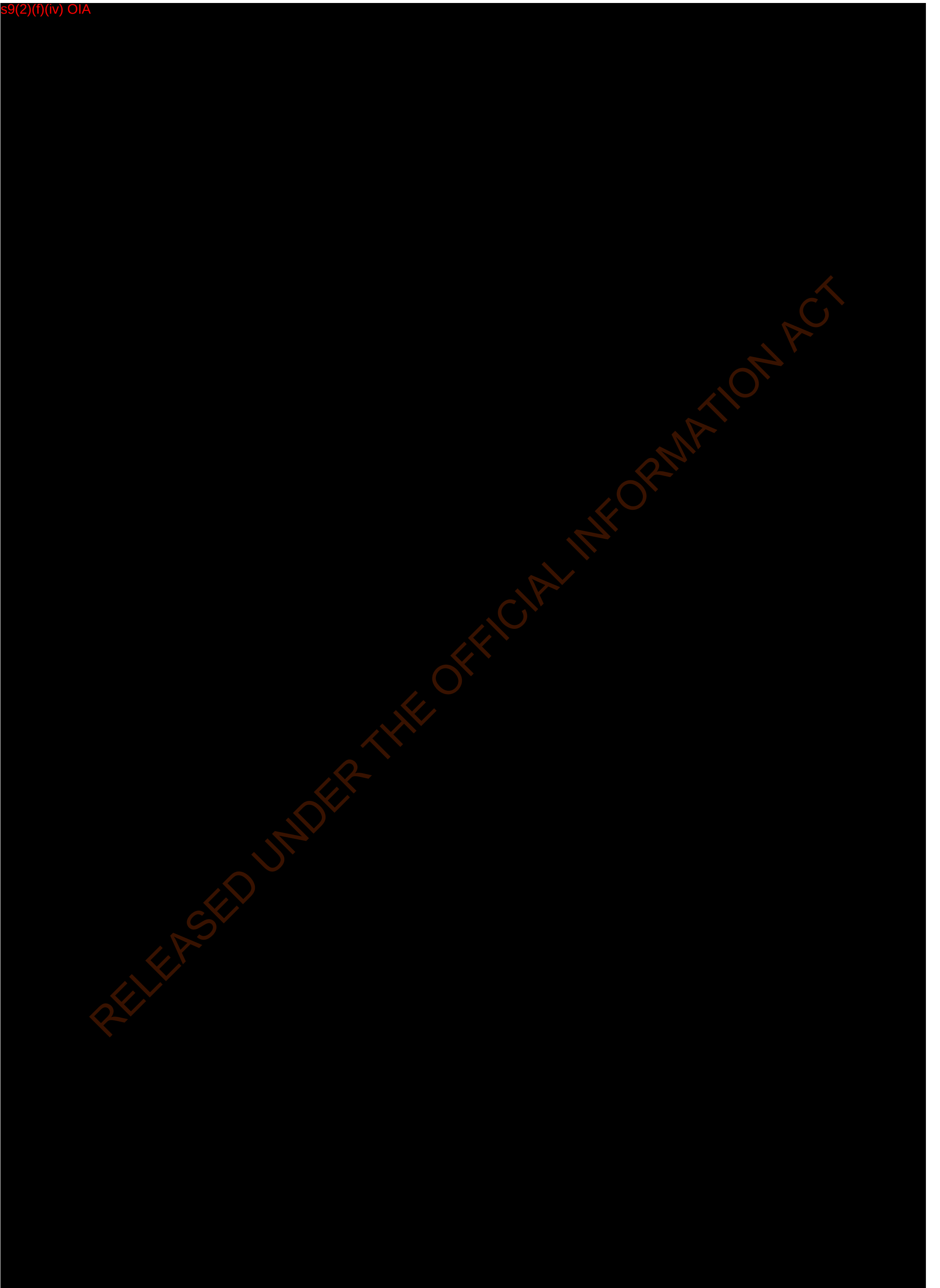
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Also note, the views expressed in this message may not necessarily reflect those of the New Zealand Police. If you have received this message in error, please email or telephone the sender immediately

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Firearms & Licences – By the Numbers

To possess a firearm you must first have a current firearms licence

233,488 99.83% A-Standard
358 0.15% D-Dealer
44 0.02% V-Visitor

(excludes ~150 deceased licence holders where presence of firearms previously held are yet to be confirmed)

Current licences as at 31 August 2023

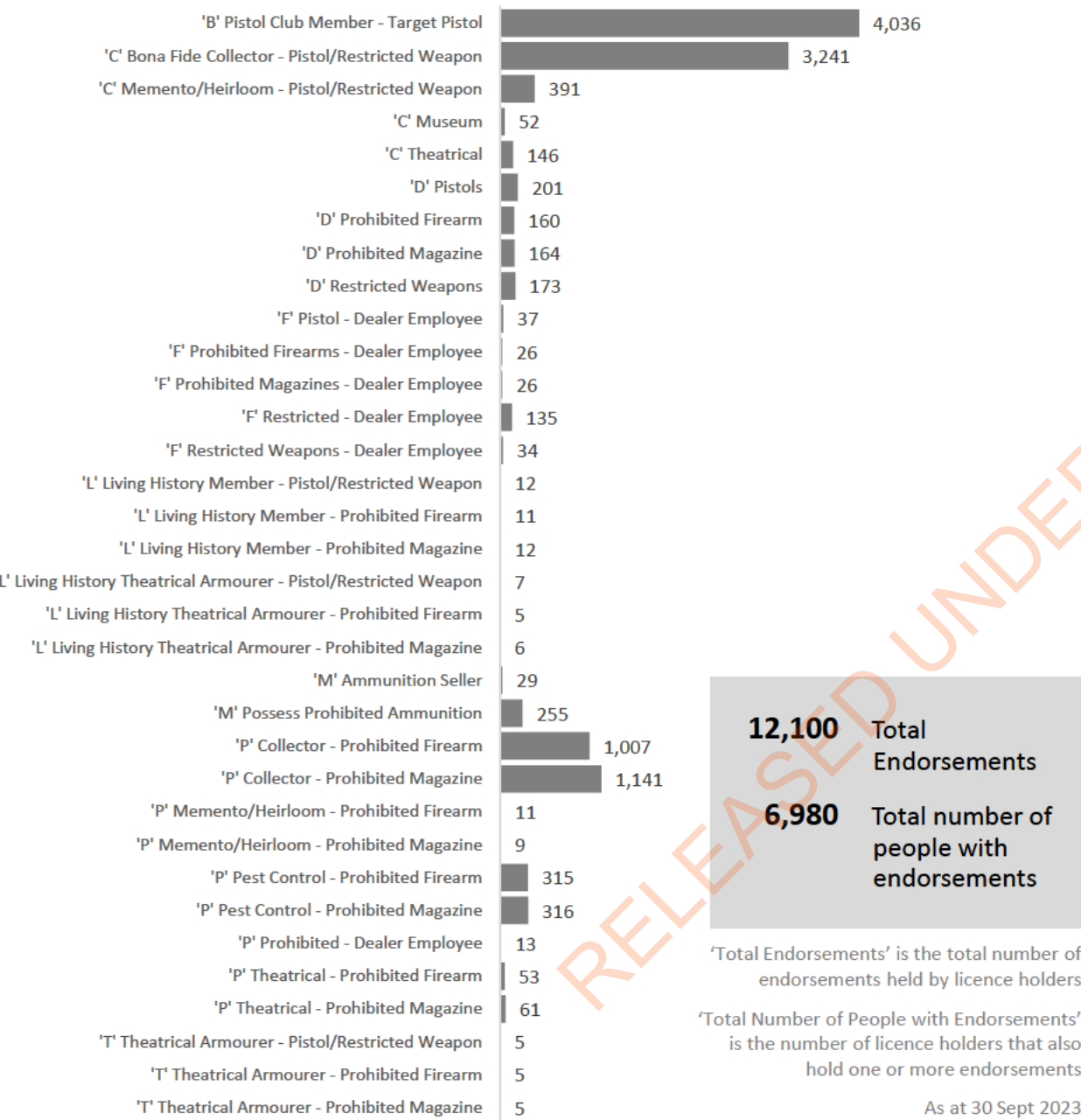
What is a current licence

The count of licences (at left) includes licences in the status of:

- Current
- Renewal in progress
- Suspension or revocation in progress
- Considering revocation – No Suspension

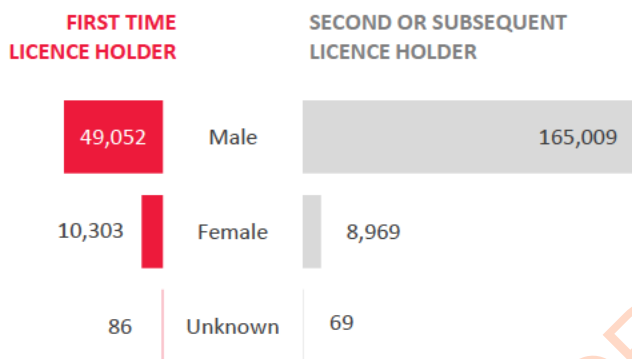
It also includes licences that have expired but the licence holder has applied to renew their licence before expiry. These are treated as ‘Current’ until a final decision has been made

Licence holders must have an endorsement to possess or use some classes of arms items

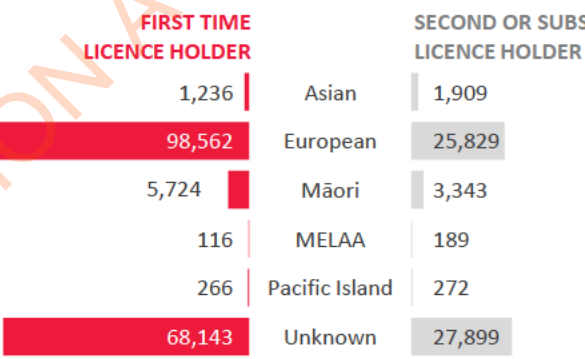


Who holds a firearms licence

Men are more likely to hold a licence



As are Europeans

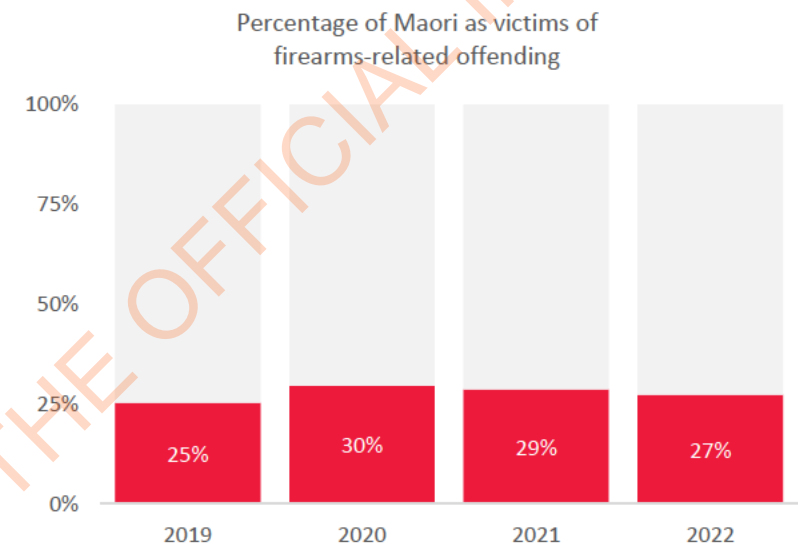


Note: gender chart does not include 43 visitor licences and ethnicity chart, 44 visitor licences

Note: A visitor's licence is only valid for a short period; up to 12 months maximum)

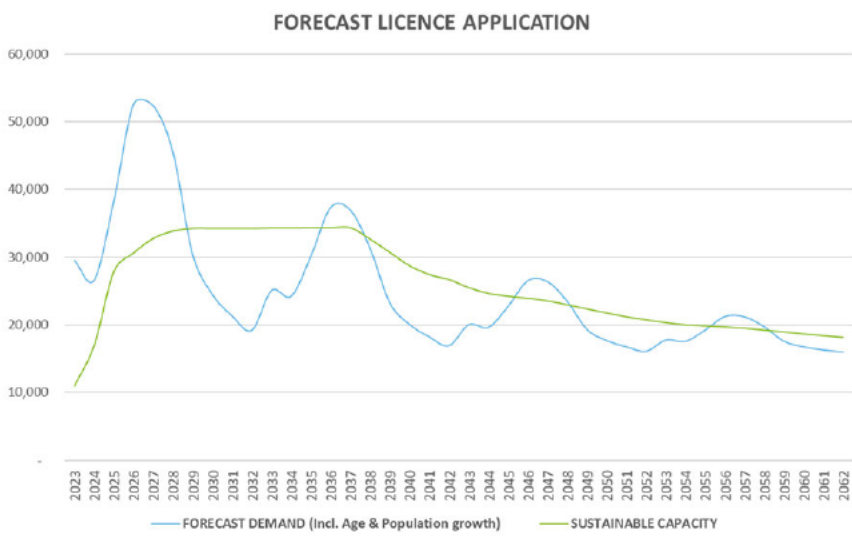
Data as at 31 August 202

Māori are disproportionately more likely to be victims of firearms-related offending



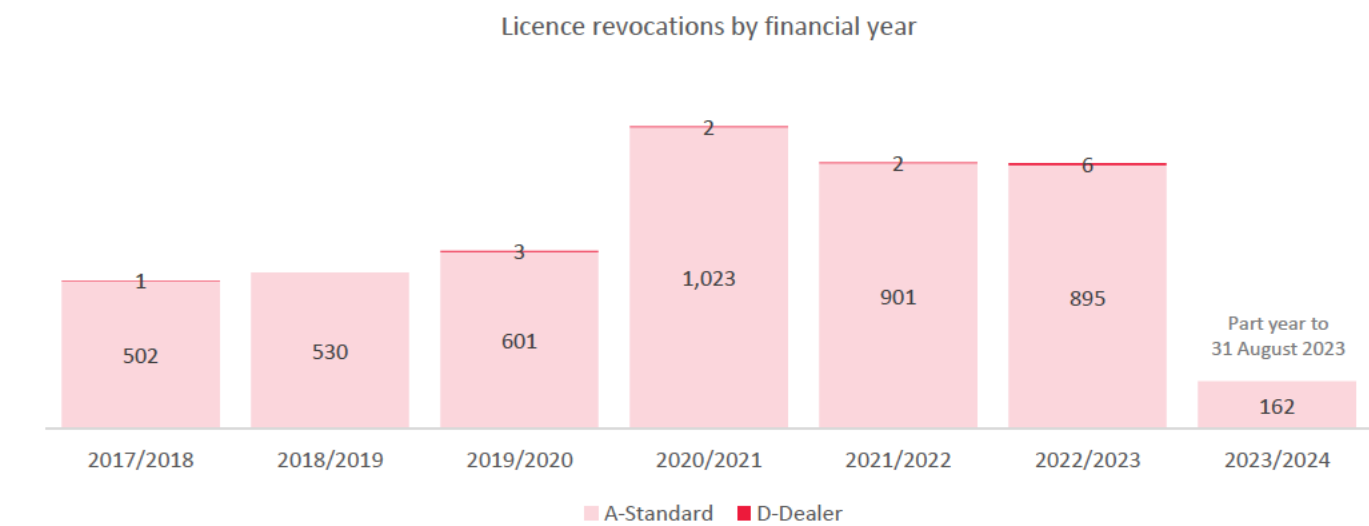
Note: ethnicity information obtained from Police data on licence holders linked to firearms-related only where a victim and the victim's ethnicity recorded. Only around 60% of cases is the ethnicity of victims recorded

Demand for a firearms licence is cyclical in nature

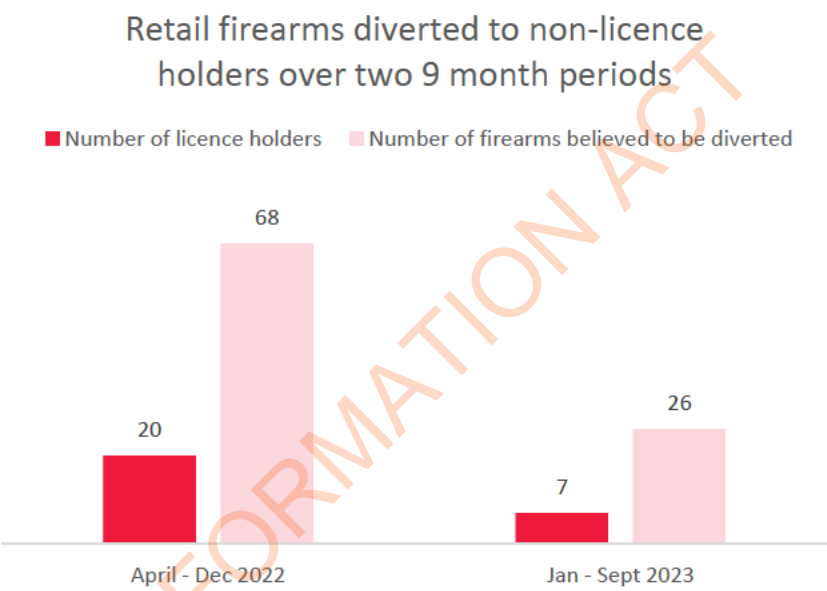
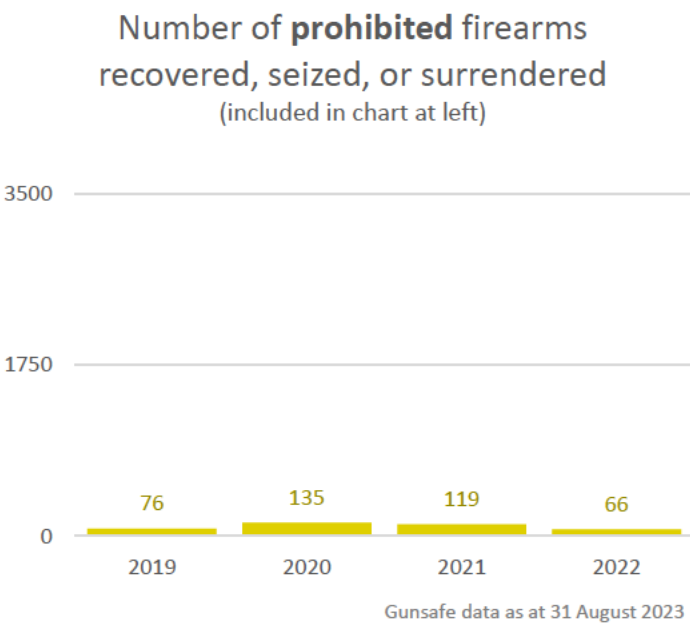
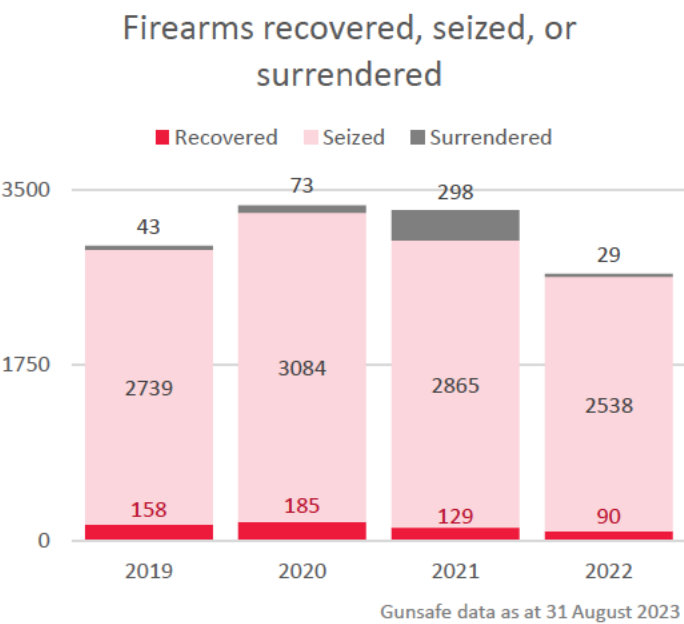


Note: cyclical pattern reflecting the 1992 change from lifetime licences to ten-year licence

Licence revocations since 2020 amendment to the Arms Act



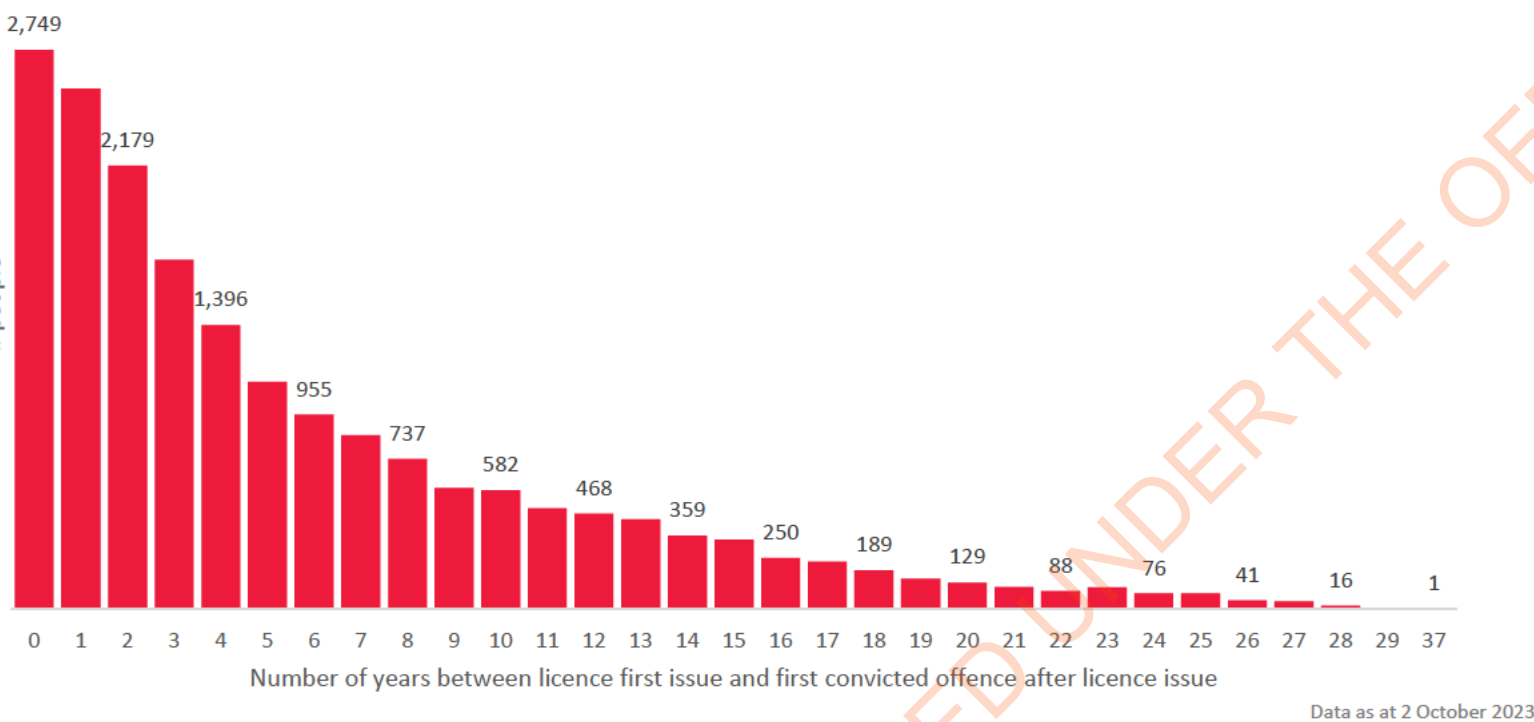
Note: In 2020/2021, revocations were centralised and reflect the changes brought in by the Arms Legislation Act 2020



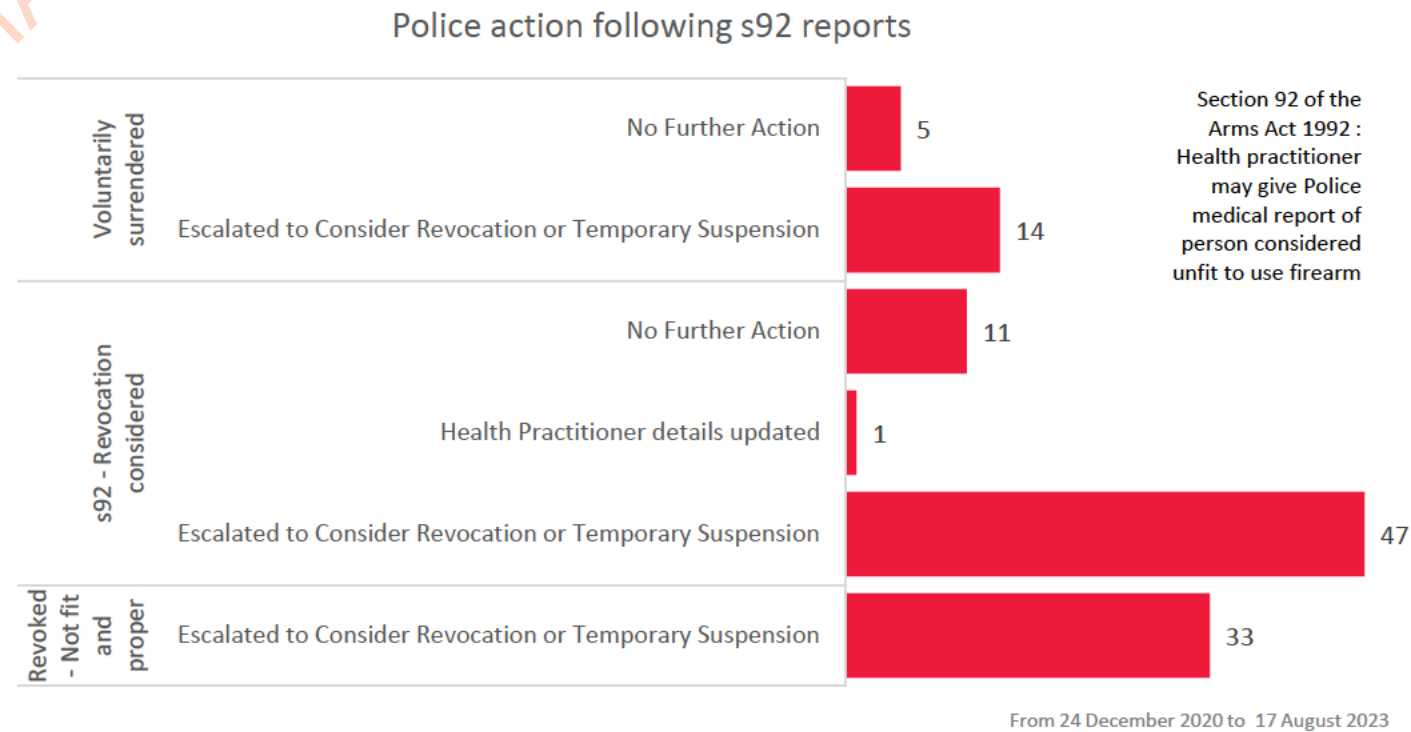
Number of licence holders identified as purchasing firearms from a retail firearms dealer and identified as supplying to non-licence holders (since establishment in April 2022 of Firearms Intelligence Team post-Operation Tauwhiro) by a licence holder

Data does not include the several active investigations underway as at 17 October 2023

The longer someone holds a licence, the less likelihood there is of them being convicted of an offence



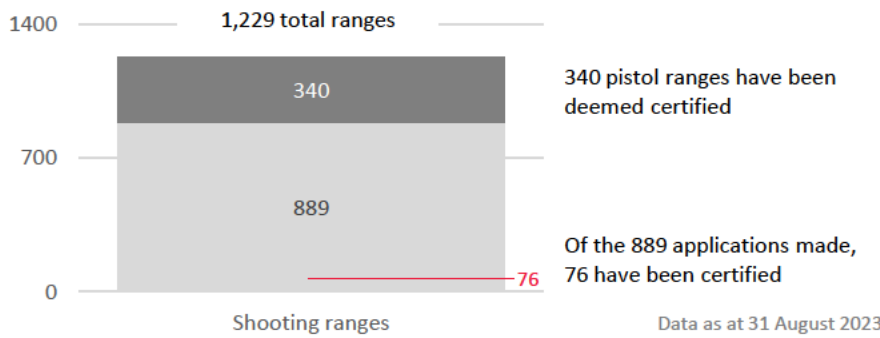
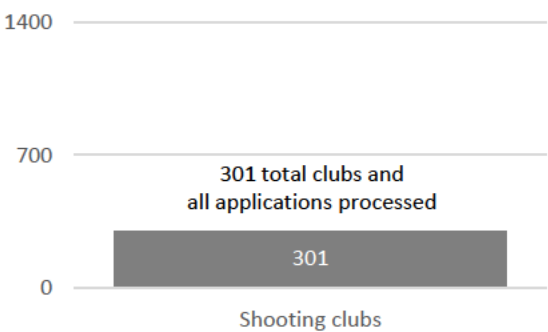
Action taken on receipt of health practitioner notification does not always result in revocation



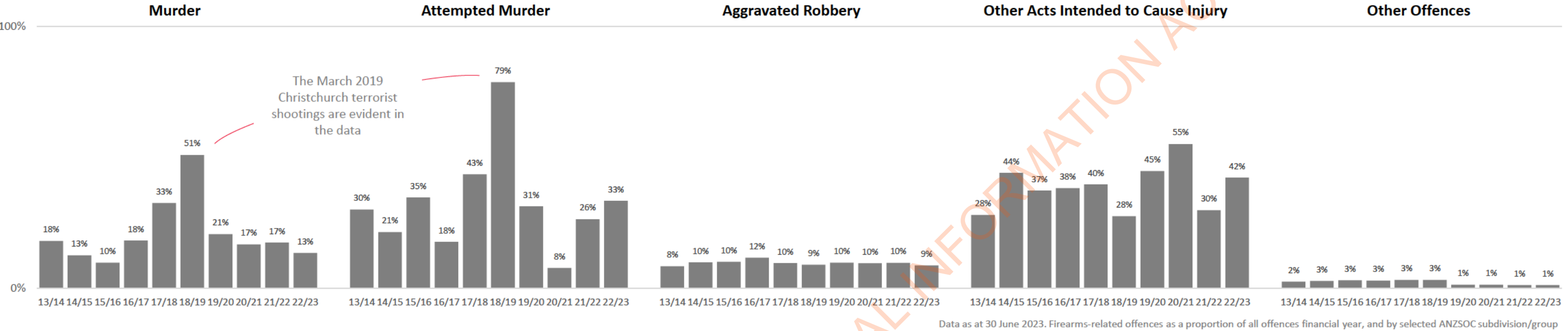
Regulatory Oversight of Clubs and Ranges began on 24 June 2023 (Arms Act Part 6)

The Arms Act enabled all established shooting clubs and shooting ranges to continue to operate beyond 24 June 2023 provided they made application for certification by that date, pending a decision

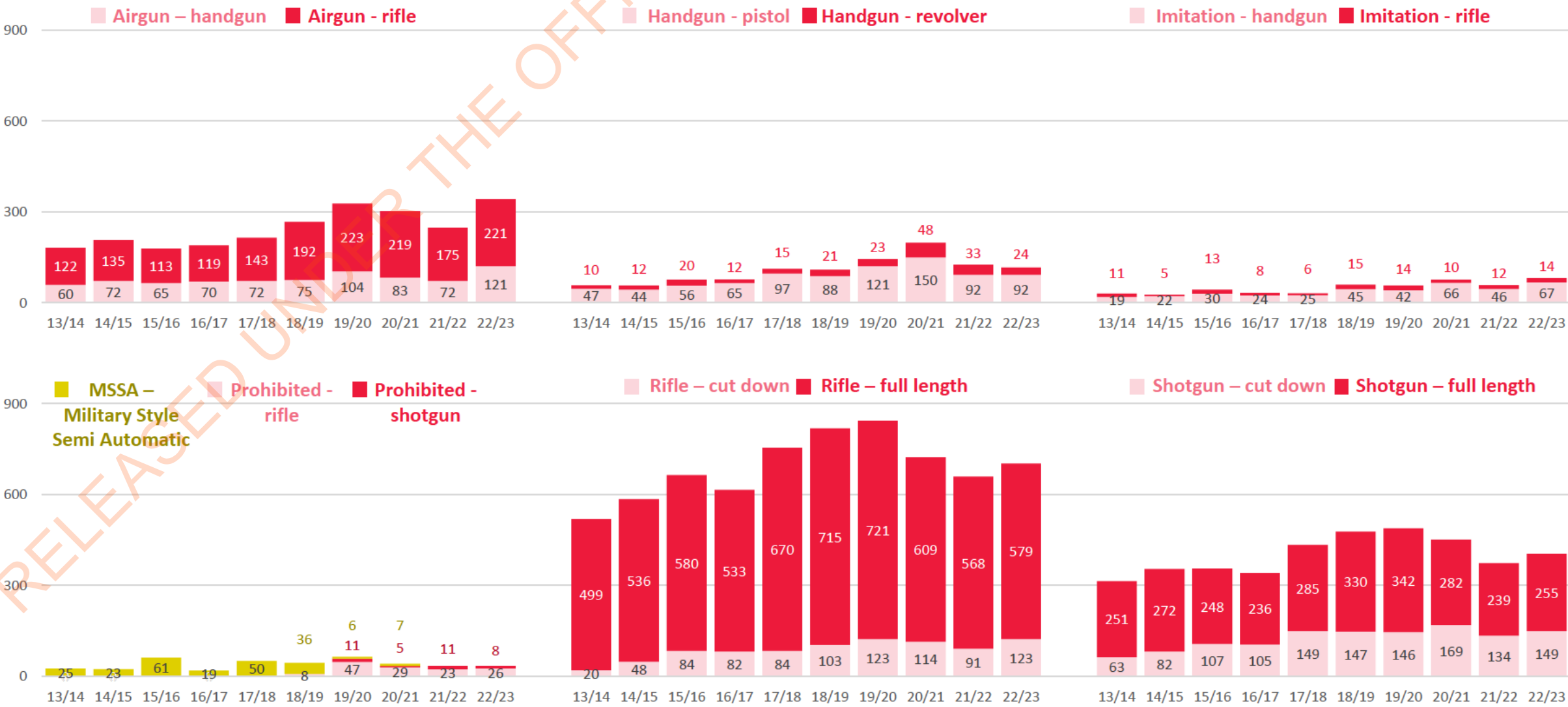
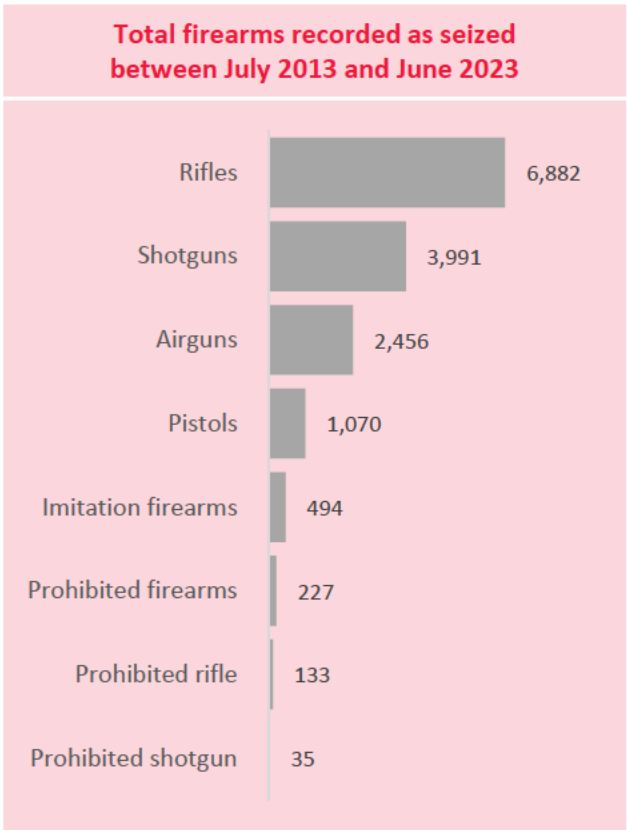
Note: All established pistol clubs and pistol shooting ranges as at 24 June 2023 were deemed approved



Firearms are a relatively large factor in other acts intended to cause injury



Rifles represent the largest number of firearms recorded as seized, followed by shotguns and then airguns



NOTE: Changes in legislation in 2019 removed the category 'MSSA – Military Style Semi Automatic' and introduced 'Prohibited firearms'

Legislative Change and Firearms Operating Environment

PURPOSE OF THE ACT	Promote the safe possession and use of firearms and other weapons, and impose controls on the possession and use of firearms and other weapons										LEGAL PURPOSES	Business purposes such as livestock farming, pest control, commercial supply of firearms, and theatrical purposes		Recreational purposes such as hunting, food gathering, collecting, historical re-enactments, and games		Sporting purposes competitive target shooting under controlled conditions																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
HIGH LEVEL STRATEGIES	Prohibiting or controlling access to high-risk firearms and arms items			Reducing availability to high-risk users (inexperienced, children, criminal)			Prohibiting or controlling high-risk use			Promoting acceptance of responsibility for the ownership and use of firearms.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
PRE APRIL 12 2019 INTERVENTIONS	Import controls over all firearms and some parts (import permits)			Good reason required to import higher-risk firearms (MSSAs, restricted weapons, restricted airguns)			No firearms licence required to import/possess ammunition and magazines			Limited controls over blank firing guns			Fit and proper assessment undertaken when applying for a firearms licence			Further fit and proper assessment required to possess, sell, hire, and manufacture higher-risk firearms (pistols, MSSAs, restricted weapons).			Require the availability of secure storage but no ability for Police to inspect firearms or storage after purchase of standard firearms; no oversight of standard firearm purchases unless identified in records held by dealers.			Must apply for endorsement to possess MSSAs, pistols, restricted weapons and conditions placed on the endorsement			May only use pistols on pistol ranges Cannot fire restricted weapons unless with special permission and can only fire blanks			First-time applicants must undertake practical training and assessment																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													
ADDITIONAL 2019/2020 LEGISLATIVE INTERVENTIONS	Prohibited most semi-automatic firearms and parts			Through buyback, over 60,000 newly prohibited firearms were handed in or modified and over 205,000 newly prohibited parts and magazines			Prohibited high-capacity magazines and non-civilian ammunition			Firearms licence and import permits extended to all magazines, ammunition, blank-firing guns, and pistol carbine conversion kits.			Gives transparency to the fit and proper assessment process			Reduces the length of a licence to 5 years for first-time licence holders, and those whose licence expired, or was surrendered or revoked			Specifies criteria that disqualify an applicant from holding a firearms licence if in the previous 10 years they have been convicted or released from custody for certain offences, or had a protection order made against them			Places tight control over possession of prohibited firearms, limited to certain exempted persons			New endorsements for certain persons to possess prohibited firearms and magazines			Require a firearm licence to sell ammunition			Extends oversight to all target shooting clubs and ranges – certification of ranges giving greater control over use			Makes clear that conditions can be placed on licences and endorsements enabling tight control over the use of prohibited firearms			The Act now specifies that: • possession and use of arms is a privilege • all licence holders including dealers and manufacturers must act in the interests of personal and public safety • statutory Ministerial Arms Advisory Group monitoring the extent the objectives of the Act are being achieved			With regard to sale or hire of any arms item or ammunition, regulations may be made to specify information that must be included in any advertising, promotion or display, including advice about legal requirements over use, safe handling, transport, storage																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
IMPACTS	Reduced harm over time to the public, frontline Police, and licence holders from criminal and negligent use due to:																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																								
Greater control over the imports of firearms, parts, magazines and ammunition										Public record of firearms stolen, and the circumstances (e.g. carelessness, insecure, form vehicles), leading to improved licence holder behaviour, fewer firearms stolen, and greater transparency of Police regulatory activity										Reduction and stabilising of number of high-risk licence holders										Reduction of number of high-risk non-licence holders through Firearms Prohibition Orders										Reduction in illegally transferred and possessed firearms because firearms are unable to be transferred without Police approval on issue of revocation notices										Improved security checking leading to reduction in stolen firearms and fewer firearms held illegally										Fewer high-risk firearms available for criminal use										Reduction in the availability of ammunition and reduced risk of harm to police and the public										Licence holders willingly comply with the regulatory requirements.										Ministerial Advisory group satisfied that the objectives of the Arms Act are being delivered upon										Improved trust and confidence in the regulatory regime										Improved understanding and transparency of the regulatory requirements of the Arms Act for both licence holders and the wider public. Licence holders involved in promoting best practice																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
Gradual harm reduction from change in mix of firearm type from higher risk to lesser risk and older										Remove ability of non-firearms licence holders to import ammunition																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															

s. 9(2)(f)(iv)

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s.9(2)(f)(iv) OIA

RELEASED UNDER THE OFFICIAL INFORMATION ACT

s.9(2)(g)(ii)

From: s.9(2)(g)(ii)
Sent: Monday, 11 December 2023 11:43 am
To: s.9(2)(g)(ii) OIA
Subject: RE: For Arms Act review FW: New f/lic holder HP notifications - persons on certain Visas unable to register

Hi s.9(2)(g)(ii)

Sorry for the delay – been fairly swamped for the last few weeks so just coming back to these emails now.

As far as the particular case, sounds like a reasonable outcome to me. Re. using s24(3) – while I can't spot anything preventing it being used in that way, there might be a couple of issues to work through. In particular you'd likely need to be careful to keep the info getting back from the practitioner to a yes/no if they are a patient – as until the person is a licence holder the practitioner doesn't have the protections for disclosing personal info under s92.

Re. refusing to issue – yeah agree, I think I raised that same point on the instructions for this topic. If there is some other evidence that the person has health issues or is concealing something arguably they could be declined on F&P grounds, but for just not providing a practitioner that seems difficult to argue. That may also raise a further issue of, if a practitioner is not strictly required to decide on an application, making sure the person is not unjustifiably disadvantaged (like by having their licence delayed) if the practitioner they've provided does not confirm promptly they are their patient.

Cheers,

s.9(2)(g)(ii)
Senior Policy Advisor – Firearms Policy
Policy and Partnerships
E s.9(2)(g)(ii)



From: s.9(2)(g)(ii) OIA
Sent: Friday, 1 December 2023 10:04 AM
To: s.9(2)(g)(ii)
Subject: For Arms Act review FW: New f/lic holder HP notifications - persons on certain Visas unable to register

Hi s.9(2)(g)(ii)

s. 9(2)(f)(iv)

A licence applicant provided a health practitioner on their application as required and we issued the licence. The health practitioner was then notified when the licence was issued as we are required to do and they responded saying this licence holder is not their patient.

s.9(2)(a) OIA

and they are ineligible to register with a GP due to the eligibility requirements set by Te Whatu Ora (<https://www.tewhatauora.govt.nz/our-health-system/eligibility-for-publicly-funded-health-services/guide-to-eligibility-for-public-health-services>)

My only solution for this person is to allow him to provide us with the name of the nearest urgent care clinic (or have no record of any clinic at all) and then advise us of his actual GP once he is eligible to enrol (per his licence conditions anyway). I don't think we can remove his licence off of him because of this and I don't think we can ask him to enrol with a nurse practitioner or psychologist.

Another way around this general issue we have been thinking of – could we, as an operational process, contact nominated GPs during the application process and ask if the applicant is their patient, as section 24A(3) allows us to seek any information we think is appropriate? In saying that, if we find out during the application process that they aren't actually enrolled with a GP, or can't enrol due to full books, or aren't eligible to enrol, would we even have grounds to refuse to issue the firearms licence? I am thinking probably not so we would be in the same position anyway looking for work arounds.

Happy to discuss this topic if required – it was my portfolio in my previous team so I am passionate about this!

Ngā mihi nui

s9(2)(g)(ii) OIA

Operational Policy Lead

M s9(2)(g)(ii)
E s9(2)(g)(ii)



<https://www.firearmssafetyauthority.govt.nz>

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[]

From: s.9(2)(g)(ii)

Sent: Thursday, 9 November 2023 11:06 am

To: s.9(2)(g)(ii)

Subject: New f/lic holder HP notifications - persons on certain Visas unable to register

Hi s9(2)(g)(ii)

Hope all going well in the promised land of Policy?!

I have an event where, upon approval for a f/lic, a notification was sent to the nominated health practitioner who responded by advising the L/Holder had not been seen at their clinic.

s.9(2)(a) OIA

Can you provide any direction on how to proceed and comply with legislation? s.9(2)(a) OIA relates.

Many thanks,

s.9(2)(g)(ii)

s.9(2)(g)(ii)

Regulatory Services Supervisor
Te Tari Pūreke | Firearms Safety Authority

M – s.9(2)(g)(ii)

s.9(2)(g)(ii)



<https://www.firearmssafetyauthority.govt.nz>

[]

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s.9(2)(g)(ii)

From: s.9(2)(g)(ii)
Sent: Monday, 11 December 2023 11:55 am
To: TTP.OpPolicy
Subject: RE: Possible addition for Arms Act review FW: Attn; Jess s9(2)(f)(iv) OIA

Hi Jess,

And on this one – yeah that all sounds about right. While I haven't looked back through old documents to confirm the intent s9(2)(g)(i)

In the Act review there will definitely need to be a process to reach a preferred position and improve consistency. I'll check that the requirements for parts are one of the example issues on the list.

Cheers,

From: TTP.OpPolicy <TTP.OpPolicy@police.govt.nz>
Sent: Friday, 24 November 2023 9:38 AM
To: s.9(2)(g)(ii)
Subject: Possible addition for Arms Act review FW: Attn; Jess, s9(2)(f)(iv) OIA

Hi s.9(2)(g)(ii)

s9(2)(f)(iv) OIA

s.6(c) OIA

Ngā mihi maioha

s9(2)(g)(ii) OIA

M s9(2)(g)(ii)
E s.9(2)(g)(ii)



Te Tari Pūreke
Firearms Safety Authority

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□

From: s.9(2)(g)(ii)
Sent: Wednesday, 22 November 2023 9:23 am
To: TTP.OpPolicy <TTP.OpPolicy@police.govt.nz>
Subject: Attn; Jess. Question around supplying a non-prohibited part

s9(2)(f)(iv) OIA

s.6(c) OIA

Is this accurate? Or is there something I am missing?

Ngā mihi nui
s.9(2)(g)(ii)
Arms Supervisor
Registry & Services Team 5
PNHQ

M s9(2)(g)(ii)
E s.9(2)(g)(ii)

□



Te Tari Pūreke
Firearms Safety Authority

s. 9(2)(f)(iv)

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s. 9(2)(f)(iv)

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s. 9(2)(f)(iv)

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s. 9(2)(f)(iv)

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s. 9(2)(f)(iv)

RELEASED UNDER THE OFFICIAL INFORMATION ACT

s. 9(2)(f)(iv)

RELEASED UNDER THE OFFICIAL INFORMATION ACT

s. 9(2)(f)(iv)

RELEASED UNDER THE OFFICIAL INFORMATION ACT

s. 9(2)(f)(iv)

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s. 9(2)(f)(iv)

RELEASED UNDER THE OFFICIAL INFORMATION ACT

s. 9(2)(f)(iv)

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From: [MANSELL, Angela](#)
To: [WHITE, John](#); [s9\(2\)\(g\)\(ii\) OIA](#)
Cc: [SEARANCKE, Laura](#); [CARSE, David \(Scott\)](#)
Subject: Legislative amendment priorities - Firearms Safety Authority
Date: Wednesday, 10 January 2024 9:52:10 am
Attachments: [Legislative amendment priorities - Firearms Safety Authority.docx](#)

Morena John and Nick

In relation to our meeting at 10.30am, attached is a list of leg amendments prioritised from our regulatory/operational perspective and agreed with our ALT. I'd like to walk through this with you and Nick in case it needs to be rethought.

Minister McKee asked Angela directly for an FSA overview of leg amendments. I'm keen to discuss how to navigate this request and position ourselves helpfully given the MoJ briefings and timeframes.

In our focus we have three areas we'd like to provide very high-level advice on:

s9(2)(f)(iv) OIA

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s.9(2)(f)(iv) OIA

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s.9(2)(f)(iv) OIA

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s.9(2)(f)(iv) OIA

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s.9(2)(f)(iv) OIA

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From: s.9(2)(g)(ii)
To: WHITE, John; s.9(2)(g)(ii)
Subject: RE: Covernote
Date: Wednesday, 29 November 2023 10:41:29 am

Another suggested edit –

Some of the initiatives will require amendments to primary legislation and regulations, and other proposals will require significant operational changes and have potentially significant cost implications.

From: s.9(2)(g)(ii)
Sent: Wednesday, 29 November 2023 10:39 AM
To: WHITE, John <John.White@police.govt.nz>; s.9(2)(g)(ii)

Subject: RE: Covernote

Hi John

I wonder if we should reinforce this point because it is quite strong throughout the 100 day briefing at Jeremy's request and he even wanted it as a recommendation, something like: Following any transition of responsibility for the Arms Act, Police will continue to support you with advice on the firearms regulatory environment and any proposed amendments to the Arms Act, given our strong interest in protecting public safety and the safety of frontline officers.

Ngā mihi,

s.9(2)(g)(ii)

From: WHITE, John <John.White@police.govt.nz>

Sent: Wednesday, 29 November 2023 10:28 AM

To: s.9(2)(g)(ii)

Subject: Covernote

Lia ora

The draft covernote is as follows – feedback would be great:

“

The attached Firearms System briefing was largely prepared prior to the coalition. This is due to our desire to explain the complexity of the system.

We/I provided you with our briefing on the 100 day plan which sets out how we can help you achieve your coalition agreement goals. We are also committed to helping you achieve the objectives of the coalition agreement in relation to firearms.

We/I understand the coalition agreement sets out the changes sought to the system as follows:
Firearms Law Reform

- Rewrite the Arms Act 1983 to provide for greater protection of public safety and simplify regulatory requirements to improve compliance and pass it through all stages during this term of Parliament.
- Transfer responsibility for the Arms Act 1983, policy and regulation to the Ministry of Justice, and transfer the Firearms Safety Authority, administrator of the Act, to another department such as the Department of Internal Affairs.
- Review whether the Firearms Registry is effectively improving public safety, beginning by June 2024.
- Immediately begin to repeal and replace Part 6 of the Arms Act 1983 relating to clubs and ranges.

There are number of issues Police will need to consider and advise you on. Some of the initiatives will require amendments to primary legislation and regulations, and other changes will

require significant operational changes.

The transfer of the firearms regulatory function to another agency is likely to be complex. Police will work with the preferred host agency to ensure a smooth transition of functions. Issues to address staffing changes, operating model, transition planning, funding, location, technology, and its ongoing relationship with Ministry of Justice and NZ Police.

We/I look forward to working with you.”

John WHITE

Manager Policy - Firearms

Policy & Partnerships

✉ Police National Headquarters | 180 Molesworth Street | PO Box 3017 | Wellington 6011 DX SX11149

✉ Email: john.white@police.govt.nz | ☎ **s.9(2)(a) OIA**

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From: [HEATH, Nicola](#)
To: [Wheeler, Sally](#); [WHITE, John](#)
Cc: [Soper, Amy](#); [Ved, Nishesh](#); [s.9\(2\)\(g\)\(ii\)](#)
Subject: RE: [EXTERNAL] Pausing commissioning on costs of transfer of TTP
Date: Sunday, 4 February 2024 11:45:08 am
Attachments: [co-\(18\)-2-proposals-with-financial-implications-and-financial-authorities.pdf](#)
[#18MM SIGNED Assigning responsibility for the Arms Act 1983 to the Justice portfolio.pdf](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Hi Sally

Upon advice from Police Corporate Finance, we are wanting to confirm that we have received the necessary Ministerial approvals for this policy change as per CO(18)02 as otherwise we feel we cannot make this fiscally neutral adjustment.

I have been advised that a briefing was prepared (attached), so are you please able to provide the signed letter with the Prime Minister's formal authorisation please?

I will then confirm that the letter is sufficient to support the financial transfer in MBU with our Corporate Finance team.

Please do not hesitate to contact me if any questions.

Regards,

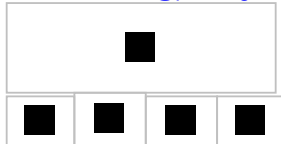
Nicola Heath

Principal Strategic Finance Advisor

Financial Planning

M [s.9\(2\)\(a\) OIA](#)

E Nicola.Heath@police.govt.nz



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From: Wheeler, Sally <Sally.Wheeler@justice.govt.nz>

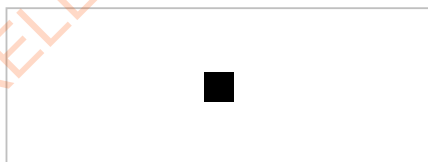
Sent: Friday, 2 February 2024 12:15 pm

To: WHITE, John <John.White@police.govt.nz>

Cc: Soper, Amy <Amy.Soper@justice.govt.nz>; Ved, Nishesh <Nishesh.Ved@justice.govt.nz>; HEATH, Nicola <Nicola.Heath@police.govt.nz>; [s9\(2\)\(g\)\(ii\)](#)

Subject: RE: [EXTERNAL] Pausing commissioning on costs of transfer of TTP

Excellent – thank you



Sally Wheeler

Policy Manager | Criminal Justice Unit | Policy Group

Ministry of Justice | Tāhū o te Ture

[s.9\(2\)\(a\) OIA](#)

Justice Centre | 19 Aitken Street | Wellington 6011

From: WHITE, John <John.White@police.govt.nz>

Sent: Friday, 2 February 2024 10:32 am

To: Wheeler, Sally <Sally.Wheeler@justice.govt.nz>

Cc: Soper, Amy <Amy.Soper@justice.govt.nz>; Ved, Nishesh <Nishesh.Ved@justice.govt.nz>; HEATH, Nicola <Nicola.Heath@police.govt.nz>; [s9\(2\)\(g\)\(ii\)](#)

Subject: RE: [EXTERNAL] Pausing commissioning on costs of transfer of TTP

Hi Sally

The Police finance contact for this is Nicola Heath, Principal Strategic Finance Advisor.

Nicola.Heath@police.govt.nz

I've cc'd her into the email.

Kind regards

John

From: Wheeler, Sally <Sally.Wheeler@justice.govt.nz>

Sent: Thursday, 1 February 2024 1:29 PM

To: WHITE, John <John.White@police.govt.nz>

Cc: Soper, Amy <Amy.Soper@justice.govt.nz>; Ved, Nishesh <Nishesh.Ved@justice.govt.nz>

Subject: [EXTERNAL] Pausing commissioning on costs of transfer of TTP

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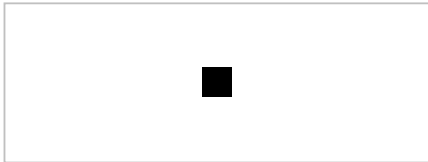
Kia ora John

As you know, I'm working with Justice Finance to shift the firearms policy funding through MBU.

Are you able to provide us with a contact at Police Finance, so the teams can connect up and align?

Chat soon

Sally



Sally Wheeler

Policy Manager | Criminal Justice Unit | Policy Group

Ministry of Justice | Tāhū o te Ture

s.9(2)(a) OIA

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From: [WHITE, John](#)
To: [DL Firearms Policy Team](#)
Subject: FW: [EXTERNAL] Justice Delegations for Hon McKee
Date: Friday, 19 January 2024 8:34:27 am
Attachments: [Justice Delegations Hon Nicole McKee.pdf](#)

From: WHITE, John
Sent: Thursday, 18 January 2024 10:38 AM
To: ROTH, Tanya <Tanya.Roth@police.govt.nz>; WOOD, Jeremy <Jeremy.Wood@police.govt.nz>
Cc: Firearms Policy Team <FirearmsPolicyTeam@police.govt.nz>
Subject: FW: [EXTERNAL] Justice Delegations for Hon McKee

Hi

Please find attached the letter of delegation from the Minister of Justice to the Associate Minister of Justice – the delegation includes all issues delegated in the Justice portfolio.

Notably, there is the following paragraph....

“In your capacity as Associate Minister of Justice, I intend to delegate to you the development and passage of amendments to the Arms Act 1983 to provide for greater protection of public safety and simplify regulatory requirements. As you know, ministerial responsibility for the Arms Act 1983 currently sits with Hon Mark Mitchell, as Minister of Police. I am liaising with the Prime Minister and the Minister of Police about the timely transfer of ministerial responsibility for the Arms Act to me as Minister of Justice. Once approved by the Prime Minister and transferred, you will have **delegated responsibility for the associated policy and regulations for firearms law reform.**”

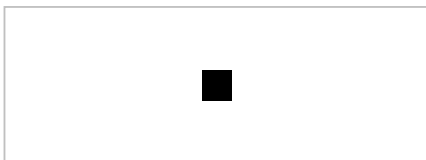
Kind regards

John

From: Wheeler, Sally <Sally.Wheeler@justice.govt.nz>
Sent: Thursday, 18 January 2024 10:23 AM
To: WHITE, John <John.White@police.govt.nz>
Subject: [EXTERNAL] Justice Delegations for Hon McKee

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FYI



Sally Wheeler

Policy Manager | Criminal Justice Unit | Policy Group

Ministry of Justice | Tāhū o te Ture

s.9(2)(a) OIA

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s.9(2)(h) OIA

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From: [REDACTED]
To: s.9(2)(g)(ii)
Subject: FW: Briefing to Minister on FSA Entity structures
Date: Tuesday, 19 March 2024 5:02:33 pm
Attachments: image001.png

From: SMIT, Martin <Martin.Smit2@police.govt.nz>
Sent: Monday, 8 January 2024 10:59 am
To: [REDACTED]
Cc: WHITE, John <John.White@police.govt.nz>
Subject: RE: Briefing to Minister on FSA Entity structures

Hi [REDACTED]

I think all three options will require legislative change to the Arms Act and potentially the Policing Act.

s9(2)(f)(iv) OIA

Thanks,
Martin

Martin Smit



From: s.9(2)(g)(ii)
Sent: Monday, 8 January 2024 10:29 AM
To: SMIT, Martin <Martin.Smit2@police.govt.nz>
Cc: WHITE, John <John.White@police.govt.nz>
Subject: RE: Briefing to Minister on FSA Entity structures

I think it would also be useful to know what the three options are that you are modelling. I assume that some of these will have legislation implications.

From: SMIT, Martin <Martin.Smit2@police.govt.nz>
Sent: Monday, 8 January 2024 9:52 am
To: s.9(2)(g)(ii)
Cc: WHITE, John <John.White@police.govt.nz>
Subject: RE: Briefing to Minister on FSA Entity structures

Hi [REDACTED]/John,

Majority of the focus this week will be to develop the financial model that underpins this, so I have meetings scheduled with the programme team, Finance and ICT to populate this. I've scheduled a workshop with ALT for next week to walk them through it, [REDACTED] I wonder if it will be more valuable to have you attend that meeting? We will be developing an A3 that summarises the options against each other with a short briefing paper over the top, I think max 2 pages,

where we will reference the fact that Deloitte's provided some estimates for some of these options back in 2020 as part of the IBC that Cabinet considered. We might also want to highlight in the appendix the options that Cabinet considered at the time of the IBC that informed the scope of the DBC.

John - I will give you a call today to discuss.

Thanks,
Martin

Martin Smit
□

From: s.9(2)(g)(ii)
Sent: Monday, 8 January 2024 9:42 AM
To: SMIT, Martin <Martin.Smit2@police.govt.nz>
Cc: WHITE, John <John.White@police.govt.nz>
Subject: RE: Briefing to Minister on FSA Entity structures

Hi Martin,
Could you please discuss this with John as my line manager?
If I am going to be involved in briefing, it would be useful to be involved in the workshops too.
Thank you
s.9(2)(g)(ii)

From: SMIT, Martin <Martin.Smit2@police.govt.nz>
Sent: Thursday, 21 December 2023 2:52 pm
To: DL_FirearmsALT <DL_FirearmsALT@police.govt.nz>; s.9(2)(g)(ii)
BEEDEN, Eleanor (Elle) <Eleanor.Beeden@police.govt.nz>;
WINTER, Matthew (Matt) <Matthew.Winter@police.govt.nz>; CAMERON, Louise
<Louise.Cameron@police.govt.nz>; LAPLANCHE, Paul <Paul.Laplanche@police.govt.nz>
Subject: Briefing to Minister on FSA Entity structures

Good afternoon everyone,

As most of you will be aware the Commissioner discussed with the MoP yesterday the transition of FSA to another Host agency and the Minister asked for an indication of costs for moving the FSA. There are several ways this could be achieved with varying cost profiles. I have started with the development of the financial model to cost this out and hope to have it all in working order by the 8th January.

I've put the below schedule together to ensure we can meet the deadline for the week of the 22nd Jan and have started to schedule in some of the workshops.

Week 1 Activities:

Mon 8 th Jan	Tue 9 th Jan	Wed 10 th Jan	Thur 11 th Jan	Fri 12 th Jan
• Meet with	• Workshop	• Workshop	• Workshop	• Workshop

Finance & Strategic Finance (Booked) Update Financial Model – Option 1	with Programme team on Transition effort – Option 1 & Option 2 (Booked)	with ICT team on Transition effort – Option 1 & Option 2 (TBC)	with Programme team on Transition effort – Option 3 (Booked)	with ICT team on Transition effort – Option 3 (TBC) Meet with People & Culture to understand People impact (Booked)
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Week 2 Activities:

Mon 15 th Jan	Tue 16 th Jan	Wed 17 th Jan	Thur 18 th Jan	Fri 19 th Jan
Update and refine Model	Update and refine Model	Workshop with ALT (TBC)	- Draft Summary A3 – [REDACTED] - Draft Short Briefing – [REDACTED]	

Week 3 Activities:

Mon 22 nd Jan	Tue 23 rd Jan	Wed 24 th Jan	Thur 25 th Jan	Fri 26 th Jan
- Present to ALT final briefing and A3 (TBC) - Apply any updates	Executive Sign-off		Submit Briefing to Minister's Office	

Linda do you mind setting up some time for me to workshop this with ALT as outlined above, will most likely need 4 hours.

Matt – I will send invites through as soon as I hear back from you on who the right people will be from ICT to support me with this.

Many thanks,
Martin

Martin Smit
Programme Integration and Assurance Manager

Te Tari Pūreke | Firearms Safety Authority

s.9(2)(a) OIA [REDACTED]
E martin.smit2@police.govt.nz

□



s.9(2)(f)(iv) OIA

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s. 9(2)(f)(iv)

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From: [BRAZIER, Angela](#)
To: [WOOD, Jeremy](#)
Cc: [SMIT, Martin](#); [MCSKIMMING, Jevon](#); [WOOD, Linda](#); [s.9\(2\)\(g\)\(ii\)](#); [HANLON, Phil](#); [MANSELL, Angela](#); [MCILRAITH, Michael \(Mike\)](#); [WILSON, Richard \(RJ\)](#)
Subject: FW: [EXTERNAL] Pausing commissioning on costs of transfer of TTP
Date: Wednesday, 31 January 2024 10:29:24 am
Attachments: [image001.jpg](#)
[240117-FSAOptionsForAFutureLocation-04.pdf](#)

Hi Jeremy,

Attached is the document that the Commissioner wants to get to the MoP. From memory [s.9\(2\)\(g\)\(ii\)](#) had started to prepare a briefing at the point when we were asked to pause on this work so it may be worth checking in with her as to how far she got with the briefing.

Please sing out if there is anything further you need from me.

Thanks

A

Te Tari Pūreke | Firearms Safety Authority
□

From: BRAZIER, Angela
Sent: Thursday, 18 January 2024 9:14 am
To: COSTER, Andrew <Andrew.Coster@police.govt.nz>; MCSKIMMING, Jevon <Jevon.McSkimming2@police.govt.nz>; WOOD, Jeremy <Jeremy.Wood@police.govt.nz>
Cc: [s.9\(2\)\(g\)\(ii\)](#); WHITE, John <John.White@police.govt.nz>; HANLON, Phil <Phil.Hanlon@police.govt.nz>; MANSELL, Angela <Angela.Mansell@police.govt.nz>; MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>; SMIT, Martin <Martin.Smit2@police.govt.nz>; WILSON, Richard (RJ) <Richard.Wilson@Police.Govt.NZ>; WOOD, Linda <Linda.Wood@police.govt.nz>
Subject: FW: [EXTERNAL] Pausing commissioning on costs of transfer of TTP

Good morning Gents,

Given the machinery of government complexities it's been requested that we pause our response to MoP's request for indicative costs to transfer FSA.

In preparation for the briefing, we prepared the attached A3 which sets out three options for moving FSA. There are further permutations however these three options give a good indication of small, medium and large scale/cost options.

Although this request has been paused, it would be very helpful if you could verbally update MoP so he has a sense of scale and cost when Ministerial discussions commence re moving FSA.

Thanks to Martin and [s.9\(2\)\(g\)\(ii\)](#) for their excellent work to date on this and a number of briefings they've worked on together. There is also a detailed costing model underpinning the cost estimates so we can justify how the estimates were calculated.

Happy to talk through these options and our approach.

Rgds

A

Te Tari Pūreke | Firearms Safety Authority

□

From: EVANS, Jonathan <Jonathan.Evans2@police.govt.nz>

Sent: Wednesday, 17 January 2024 1:32 pm

To: BRAZIER, Angela <Angela.Brazier@police.govt.nz>; WHITE, John <John.White@police.govt.nz>; SMIT, Martin <Martin.Smit2@police.govt.nz>; s.9(2)(g)(ii)

Cc: WOOD, Jeremy <Jeremy.Wood@police.govt.nz>; HODGSON, Lee <Lee.Hodgson@police.govt.nz>; LEGGETT, Tracy-Leigh <Tracy-Leigh.Leggett@police.govt.nz>; CAMERON, Louise <Louise.Cameron@police.govt.nz>; ROTH, Tanya <Tanya.Roth@police.govt.nz>

Subject: FW: [EXTERNAL] Pausing commissioning on costs of transfer of TTP

Kia ora koutou,

As I believe you are aware, this briefing has been paused until later in the year. I understand you are already in contact with the relevant people in Justice and can provide anything they require at the appropriate time.

Thanks for all of the work that has gone into it so far.

Ngā mihi,

Jonathan

□

From: s.9(2)(g)(ii)

Sent: Wednesday, 17 January 2024 1:04 pm

To: LEGGETT, Tracy-Leigh <Tracy-Leigh.Leggett@police.govt.nz>; EVANS, Jonathan <Jonathan.Evans2@police.govt.nz>

Cc: WOOD, Jeremy <Jeremy.Wood@police.govt.nz>; s.9(2)(g)(ii)
HODGSON, Lee <Lee.Hodgson@police.govt.nz>

Subject: [EXTERNAL] Pausing commissioning on costs of transfer of TTP

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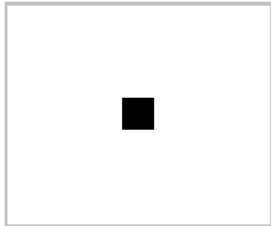
Kia ora All

Off the back of a meeting on Tuesday, [REDACTED] has confirmed that current requests for advice on the costs of the transfer of Te Tari Pūreke can be put on hold for now, feeding into more comprehensive advice the Ministry of Justice is likely to provide later in the year.

Could the change in prioritisation of this piece of work please be passed on to Te Tari Pūreke

Ngā mihi,

[REDACTED]



[REDACTED]

- Police | Office of Hon Mark Mitchell
Minister of Police | Minister of Corrections
Minister for Emergency Management and Recovery

[REDACTED]

Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

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Firearms regulatory functions subject to transfer from New Zealand Police

1) What was the original rationale for setting up the FSA?



Firearms regulatory functions subject to transfer from New Zealand Police

- 2) What are the current firearms regulatory functions undertaken by FSA, NZP or in collaboration?
- 3) What are the options and trade-offs as it relates to transferring all or part of FSA to another government agency?
- 4) How might these changes impact on achieving our strategic outcomes, and ensuring regulatory best practice for the firearms system, including how compliance and enforcement activities are undertaken?

Key Insights

- The functions of relevance to any potential transfer of the FSA out of NZP can be broken down into four categories:
 - Regulatory Functions** – these form the basis of our operational service delivery, most of which are strongly linked to roles, responsibilities and powers within the Arms Act 1983
 - Police Core Functions and Capability** – these consist of the broader suite of functions and capabilities in the wider police, as they relate to the Firearms System as a whole (i.e., beyond the Arms Act 1983)
 - Policy Functions (excluding overall administration)** – these relate to a few policy responsibilities that remain tied to NZP and the Minister of Police according to the Arms Act 1983
 - Enabling Functions** – these refer to all strategic and support functions, some of which have dedicated capacity and capability within FSA, and others relying on access through service level agreements along with key points of contact within FSA
- The Arms Act 1983, and the functions and powers it represents, makes at least **157 references** to either the Commissioner of Police, Member of the Police, Commissioned officer of the Police, or Minister of Police.

Regulatory Functions

Function	Description	No. of NZP References in Arms Act
Licensing & Endorsements	- Applications - Vetting and interviews - Security checks - Fit and proper assessment - Issuing	36
Clubs & Ranges	- Applications & Certification - Inspections & Improvement Notices	19
Imports & Manufacture	- Permits to Import - Permits to Procure	18
Border Controls	- Temporary craft visiting NZ - Seizure of illegal imports	7
Registry	- Operation of the Registry - Content requirements - Direct data access - Frontline access - Phone support	6
Compliance Monitoring (Individuals)	- Continuous Eligibility Scanning - Compliance Visits - Change of Address - Expired / Deceased - Unsafe Firearms - Registry Obligations	10
Compliance Monitoring (Dealers)	- Inspections - Recordkeeping compliance - Storage conditions	13
Resolutions – Licenses	- Health Practitioner Reporting - Conditions - Improvement Notices - Temporary Suspension - Revocation - Decision Reviews & Appeals	27
Resolutions – Firearms Items	- Seizures - Surrenders - Safe Keeping	5
Education & Engagement	- Partnerships & Engagements - Education & Guidance - Safety Training & Promotion	3
Digital Support & Transformation	- Digital transformation and enablement - Digital support for regulated parties	-

Police Core Functions and Capability

Function	Description	No. of NZP References in Arms Act
Police Enforcement	• Criminal investigations & resolutions for firearms-related use, supply & possession • Burglary / theft • Reporting of firearms-related injury or death • Firearms Prohibition Orders	5
Firearms Property & Exhibits Management	• Seizure storage & exhibits • Tier 1 & 2 Sites • Destruction / disposal • Loss & theft of firearms	5
Response	• Emergency Management • Firearms-related incidents • AOS & Negotiating Teams • Deployment to MOCs	-
Information & Channel Management	• FMCs • 111 & 105 • Front Counter & other public channels • Police Systems (e.g., CARD / NIA)	-
Prevention	• Iwi & Communities	-
Intelligence & Risk Profiling	• Armoury • Operational/Tactical Intelligence • Strategic Intelligence • Information Sharing • Utilising enhanced vetting	-
Dispute Resolution	• Integrity and Professional Conduct	-

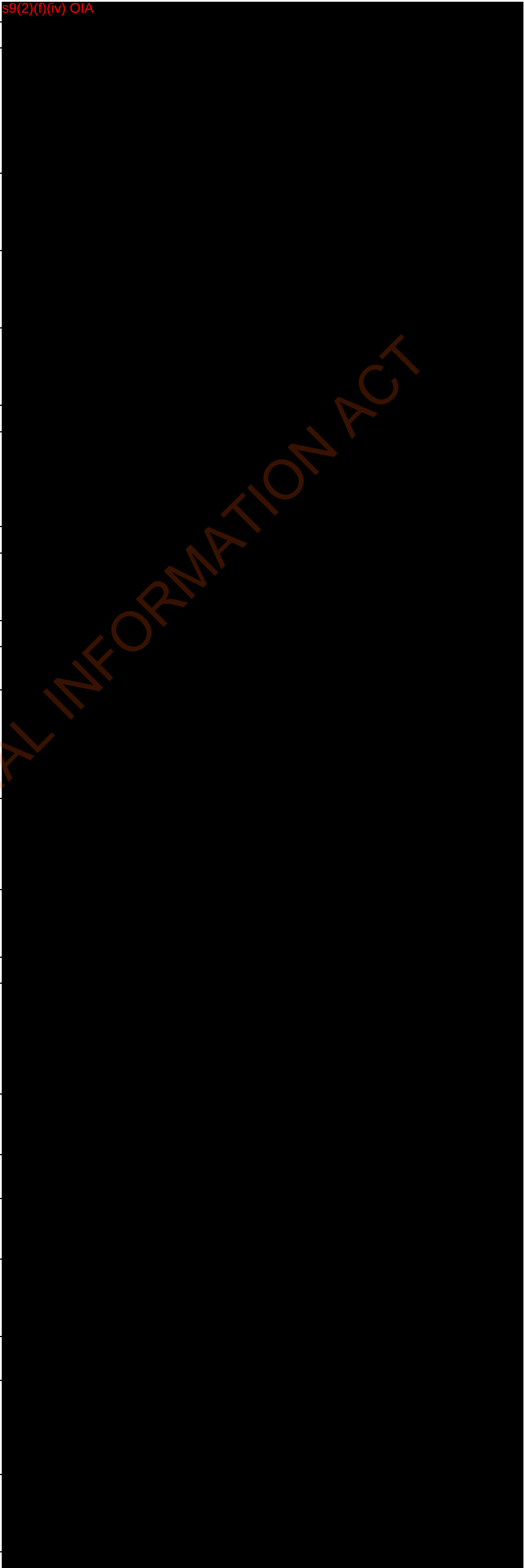
Policy Functions (excluding overall administration)

Function	Description	No. of NZP References in Arms Act
Fee & Cost Recovery	• Cost recovery & consultation • Payments & refunds	5
Other Powers specific to Commissioner of Police	• Power to declare weapons to be restricted weapons or specially dangerous airguns • Delegation powers (no less than Inspector level) • Operations of MAAG	4
Other Powers specific to Minister of Police	• Recommendations to the Governor General regarding amendments and transitional matters • Establishment of MAAG and removal of members	4

Enabling Functions

Function	Description	No. of NZP References in Arms Act
Strategy, Service Improvement & Insights	• Strategy & Planning • System Performance • Service Improvement • Performance & Insights • Operational Policy • Learning & Development	-
Governance, Min Services & Strategic Comms	• Governance and support • Ministerial services (incl., OIAs & PQs) • Brand, media, and comms	-
ICT	• Service Portal / Hub • ICT troubleshooting	-
Legal	• Legal Services / Advice • Arms Appeals • Civil Litigation	-
Finance	• Corporate Finance • Accounts • External Reporting • Asset / Financial Risk Management	-
Property & Fleet	• Property & Management • Fleet Management & Repair	-
Human Resources and Payroll	• Recruitment • Advisory • Workforce Planning • Staff Development • Negotiations	-
Health, Safety and Wellness	• Safer People • Advisory • Rehabilitation Programmes / EAP • Employment Relations	-

s9(2)(f)(iv) OIA



RELEASED UNDER THE OFFICIAL INFORMATION ACT

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s.9(2)(f)(iv) OIA

RELEASED UNDER THE OFFICIAL INFORMATION ACT

From: [REDACTED]
To: s.9(2)(g)(ii)
Subject: FW: Functions in the Arms Act
Date: Tuesday, 19 March 2024 5:20:22 pm
Attachments: [Functions in the Act version for MOJ.docx](#)

From: s.9(2)(g)(ii)
Sent: Wednesday, 7 February 2024 4:03 pm
To: Mcllwraith, Corinne <Corinne.Mcllwraith@justice.govt.nz>; Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Subject: Functions in the Arms Act

Hi Corinne and Fiona,

Please see attached the tables regarding what needs to be considered when separating Te Tari Pureke/Firearms Safety Authority from Police.

I've have divided it into three parts.

- Table 1- considers the various functions both in the Arms Act and other functions such as FSOG, OIAs etc.
- Table 2 considers other legislation that may need to be considered as part of any review to separate TTP/FSA.
- Table 3- provides a line by line of the Arms Act.

There are also some significant costs that would need to be considered if TTP was to separated from Police. This includes:

1. The IT systems are joined up and so it isn't easy to separate work processes from Police and TTP/FSA.
2. All TTP/FSA staff would need to be made redundant because Police isn't part of the public service (except for the 20 commissioned officers who could be offered jobs within Police).

Let me know if you would like to discuss this further.

Thank you

s.9(2)(g)(ii)

s.9(2)(g)(ii)

From: PETREY, Catherine
Sent: Wednesday, 13 March 2024 3:37 pm
To: TARTTELIN, Michael; s.9(2)(g)(ii) BAIRD, Peter
Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

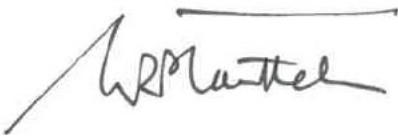
Thanks Mike

From: TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>
Sent: Wednesday, 13 March 2024 11:30 AM
To: PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>; s.9(2)(g)(ii) OIA BAIRD, Peter <Peter.Baird@police.govt.nz>
Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Where there is an injury or death Police need to attend in order to conduct an investigation (crime scene, interviews, seize exhibits etc).

The two pistol club incidents police were rung as well as ambulance. The BP incident in BOP I understand anecdotally that police were contacted by the attending ambulance.

In all three incidents C&R's conducted an independent investigations to assist the Police inquiry, The BP incident was prior to my tenure re the two pistol incidents I reported the results of those investigations to the SRO, PNZ and Police.



Senior Sergeant Mike Tarttelin
Manager Clubs and Ranges

📞 wk cell: s.9(2)(a) OIA
✉ Email: michael.tarttelin@police.govt.nz



[]

From: PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>
Sent: Wednesday, 13 March 2024 9:57 AM
To: TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; s.9(2)(g)(ii) BAIRD, Peter <Peter.Baird@police.govt.nz>
Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

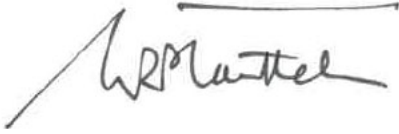
Hi s.9(2)(g)(ii)

It may be that I have misunderstood the email to Justice. I feel they think Police would get a report of an injury therefore no need to require that. How did TTP get made aware of the three incidents. Through 111 call to ambulance? Through Part 6 reports or ?.

From: TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>
Sent: Wednesday, 13 March 2024 8:57 AM

To: s.9(2)(g)(ii) MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>;
BAIRD, Peter <Peter.Baird@police.govt.nz>; PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>
Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

All three of the incidents below resulted in an injury requiring hospitalisation. The black powder rifle incident resulted in a significant gunshot wound through his buttock and into the upper thigh, both pistol related incidents where self-inflicted gunshots through the foot occurring during holstering contrary to all rules and direction, all occurring on ranges.



Senior Sergeant Mike Tarttelin
Manager Clubs and Ranges

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✉ Email: michael.tarttelin@police.govt.nz



[]

From: s.9(2)(g)(ii)
Sent: Wednesday, 13 March 2024 8:28 AM
To: TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>; BAIRD, Peter <Peter.Baird@police.govt.nz>; PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>
Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Morning

I've just seen the response sent to Justice noting that it is unlikely incidents will be reported unless there is injury as the main requirement is to record incidents. Was there injuries in all the cases below? Have we had any other reports of incidents on ranges in addition to the below?

Ngā mihi,

s.9(2)(g)(ii)

From: s.9(2)(g)(ii)
Sent: Tuesday, 12 March 2024 3:29 PM
To: TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>; BAIRD, Peter <Peter.Baird@police.govt.nz>; PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>
Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

I have this noted down – is there any update to it?

1. This is already an area where accidents or near misses are not regularly reported. Police is aware of three range safety incidents since October 2022, one was reported to us by the ambulance service

who attended for the firearms injury. The other two were pistol ranges where the shooter was not complying with the range standing orders.

Ngā mihi,

s.9(2)(g)(ii)

From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>

Sent: Tuesday, 12 March 2024 3:25 PM

To: BAIRD, Peter <Peter.Baird@police.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; s.9(2)(g)(ii)

MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>

Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Kia ora koutou,

Sorry, following up on one thing. In my very first email of this chain – a while ago, I know! – I asked:

- Is there any data yet on the way the regulations on clubs are working? For example, has there been any information provided yet about safety incidents that Police wouldn't have had but for the changes? Or about storage requirements? **Nothing that I am aware of but we'll get C&R to answer.**

Mike M's comment in red.

Pete/Mike T, is there any information you are aware of that could be helpful here?

Ngā mihi

Fiona Alexander

Principal Advisor – Harm Reduction and Public Safety

Policy Group

Ministry of Justice | Tāhū o te Ture

Tel: s.9(2)(a) OIA

Ext: 50853

www.justice.govt.nz

From: Alexander, Fiona

Sent: Tuesday, 12 March 2024 3:08 pm

To: 'BAIRD, Peter' <Peter.Baird@police.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; s.9(2)(g)(ii)

MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>

Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Kia ora koutou,

Apologies for the delay. I wanted to acknowledge your response – thank you very much for the time.

I know that s.9(2)(g)(ii) has scheduled an opportunity to discuss next week, by which point you should have a draft of the briefing. I look forward to discussing then, if not before!

Ngā mihi

Fiona

Fiona Alexander
Principal Advisor – Harm Reduction and Public Safety
Policy Group
Ministry of Justice | Tāhū o te Ture
Tel: s.9(2)(a) OIA
Ext: 50853
www.justice.govt.nz

From: BAIRD, Peter <Peter.Baird@police.govt.nz>
Sent: Tuesday, 12 March 2024 8:25 am
To: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>;
s.9(2)(g)(ii) MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Morning Fiona

Comment from myself and Mike

In respect to our not having a system. While the legislation provided a mechanism to undertake the function, the due date for the calendar year for matters under 28GO (1) and (2) are not due until 5 months after their FY. While its normal for Police to have all matters required by legislation to be prepared at the time the legislation falls due, other matters including functionality of a suitable system have been developed as there has not been a need to date although discussions are in process on how this would be managed.

s. 9(2)(f)(iv)

What has become apparent is that the LOA is critical to the reg interpretations by members who don't have a reg understanding and there is a poor connect between PNZ and its members (clubs) The LOA is not available at this time.

Additional the LOA should assist clubs through TTP providing a single audit sheet that can be used at a club and TPP (C&R level) given the audit solution is not electronic in the registry and PNZ are reluctant to assist coordinating the same.

Clarity in plain language through the LOA that all returns be they 12 shoots (28 July) or club calendar (five months after club FY which is not standard) an improvement in the reg language and submission within a short time frame post the July FY would be of benefit and ensure a short window for regulatory compliance oversight and influence. We don't have any issues with the 4 non-affiliated pistol clubs, we don't have LOA's with these.

There is a clear separation between club requirements and range operator requirements.

s. 9(2)(f)(iv)

s.9(2)(g)(ii) is looking at coordinating a further workshop next week

S9(2)(j)

OIA

[REDACTED]

[REDACTED]



[REDACTED]

[REDACTED]

From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>

Sent: Monday, 11 March 2024 3:36 pm

To: BAIRD, Peter <Peter.Baird@police.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; S.9(2)(g)(ii)

[REDACTED] MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>

Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Kia ora Pete,

Thanks very much for your feedback on these questions. I've got a few follow ups, please.

In a couple of places, you've said '**noting we don't currently have a system**'. Do you mean by this that you don't have a system currently for checking constitution/AGM minutes etc? If so, and thinking about the Minister's priorities to reduce the admin burden, do you think this could indicate requirements that could be removed? In other words, indicating that the requirement is not as useful. Alternatively, if you did have a system, what is the information that you would be taking from eg. the constitution or AGM minutes that would be helpful to Police?

I've also added a few comments in green to clarify. Bearing in mind the Minister's priority to reduce duplication, I'm keen to test whether some of these requirements are really duplicated in the requirements for range certification. Maybe there is something I've not mentioned? Are there requirements that could be done away with?

Ngā mihi

Fiona

Fiona Alexander

Principal Advisor – Harm Reduction and Public Safety

Policy Group

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Ext: 50853

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From: BAIRD, Peter <Peter.Baird@police.govt.nz>

Sent: Monday, 11 March 2024 12:51 pm

To: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>;
s.9(2)(g)(ii) MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Fiona

Responses below from mike and myself

Club's constitution/rules or any updates to it (Reg 28GA(1)(a) and Reg 28GO(1)(a))

- What are the benefits to having these? How they control membership, Introduction of criminal element into range environment as Arms act tightens access, type of shooting, techniques of shooting, range configuration and the introduction of dynamic shooting or alternative target acquisition, type of firearm, frequency of range use, hours of operation against Consents. These matters creep between constitution and club objectives and finally range certification
- What would be risks be if this was removed? Lack of oversight, noting we don't currently have a system, we could for incorporated, see this on the society register, we don't currently check these through the society, don't have the capacity, new changes don't show where such changes occur
 - Re the "new changes" not showing where such changes occur. Do you mean new changes in the Arms Act or Incorporated Societies Act? Arms Act
 - In terms of a criminal element coming into the range environment, what do you expect to see in a constitution which would tell you this? Over and above a list of members where you can check names? Processes for vetting new members. There are processes for pistol as I they need the B, which is "vetted" on the B application. Note if your joining a A cat shooting club, there is no vetting as to suitability. Deer stalkers have used the existence of a FA licence as a bench mark for membership as the applicant has passed the F& P test but you can join without the FAL and be provided with a FA and be taught to shoot
 - Would what you are looking for – type of firearm, frequency of range use etc – not be covered in the range certification/standing order? You mention that they creep between – if they are definitely needed, could the requirements for ranges clearly state these are needed for certification? While there is clear separation between a range operator and a club/ the creep occurs when styles and firearms are introduced through a club and the only stop gap is well past the introduction this being the certificate on a range as opposed o at the front end. Hawkes Bay Roy's Hill changed calibre because of shooting need, which changed the ballistics later for the range, range was not certified for this and had to be retro'd

A copy of the AGM minutes or minutes of its inaugural meeting (Reg 28GA and Reg 28GO(1)(c))

- What are the benefits to having these? Visibility of committee updating NIA re a contact but limited. Visibility of criminal element into range environment as Arms act tightens access. Post the chch shooting Police have limited understandings to what clubs were in existence and what they were doing. It was a massive audit and remains inaccurate as without the leg we didn't understand who was operating a shooting club or where. I guess it's a decision for govt if they see this as being important. Equally a criminal group could establish shooting club and conduct shooting activity on a range with no oversight.
- What would be risks be if this was removed? Introduction of criminal element into the range scene, Lack of oversight, noting we don't currently have a system
- Again, in terms of a criminal element coming into the range environment, what do you expect to see in minutes which would tell you this? We wouldn't see this in the AGM minutes, maybe vetting processes, or rules around access and use of the range by externals (head hunter example to be discussed) Will show you the pics and Intel on this type of thing. Both examples have gang members using the ranges for shooting practice. One is a PNZ member giving instruction privately, the other a business .

Aims and objectives of the club in the application (Reg 28F(1)(i))

- What are the benefits to having these? Scope as to the clubs intent. Previously unregulated, categorising what the club intends to operates as, so a risk lens can be applied. Knowing what they intend to shoot and how ensures the right level of oversight and inspection and risk is applied.

- What would be risks be if this was removed? Clubs may and they do expand through memberships and members wishing the undertaken direct disciplines and dynamic shooting (they have seen it somewhere). This is where we saw the expansion and separation of pistol clubs to focus on a particular type of shooting ie cowboy and IPSC
 - Noting that there is no requirement to update on the aims/objectives of the club through Reg 28GO, how would you know if a club has expanded/changed in the way you talk about through their aims/objectives? AGM minutes if we were looking and knew what to look for
 - Perhaps you could get this from Reg 28GO(2)(c) and(d) instead? Maybe but tis only relates to Pistol clubs, not a range operator.

Officers of the club (Reg 28G(1)(e)?

- If you have a list of members (Reg 28GA(2)), do you need to this extra layer of detail – knowing who are officers of the club (and bearing in mind this will be a requirement of the incorporated societies Act too)? Lack of oversight, noting we don't currently have a system. We would need a system that held the current officers details and then compare against new officers. It's a benefit v cost (risk) see above intro
 - Again, if you have a list of members, what's the oversight required of the officers? What's the real benefit of this oversight? Gives us an idea as to who is running and steering the club
 - I'm wondering if this is connected to Reg 28GF – so could a member of a pistol club have had a firearms licence revoked within the past 5 years? It could be but again we don't currently apply oversight, and require clubs to be aware of the same as opposed to us checking, too many clubs pros cons to undertake this for which there may be little gain. If we have the leg but not reporting, we would undertake on an audit or intel basis only, which we are in agreement for. Don't have to be a licence holder to be a member of a club, you just cant shoot
 - If so, what's the reason you would want only members who have held a licence for 5+ years being committee members/officers? Not fit and proper, done something in conflict to the act 24A Officer of a club does not have to have FA licence, no 5 year reference
 - But they could be members of the club and therefore shoot with the club? What's the distinction with not wanting them to be officers? If they are current FLH, they are fit and proper now.
- What would be risks be if this was removed? Same risk but we would not be able to check. We don't have the ability to check membership back to the constitution. Pistol clubs have to provide list of members
- (Same question of non-pistol clubs, what's the reason for only people with who have held a licence for 5+ years being committee members/officers – what's the risk if this was removed?) It does not say that, anyone can be a member or officer holder, don't need a FA licence unless revoked – thank you, I see where I've misread that requirement.

Declined membership (Reg 28GE(2)(b)?

- Thanks for explaining why it's helpful to know if pistol shooters are not members of clubs, as it goes to their endorsement. In the scenario you explained below, it's helpful to know if a shooter is ceases to be a member of club A and is then declined membership of club B, as you would know they are no longer fulfilling the requirements to have their endorsement. Would you achieve the same just with the requirement to update on members joining and members leaving? Ie club A would have given you information that the person's has left the club and you would then not have got any information from another club that the same person joined. FAL leaves one and join another TTP reconcile this and if they don't appear in the new club, by notification, then TTP enquire. Note if someone leaves a club and tells us on the 27th day (required within 28 days) and then gets declined by the new club, we are not getting currency, ie waiting 28 days that he / she hasn't joined. Its uncommon, but a point. This could be gripped up through better controls and management by PNZ secretariat but there is not enough confidence that they could / would, club independence within PNZ and the current 5 non affiliated
 - Notification that a person's membership has been declined also has a 28 day time period, so I'm still not sure what this is getting you that the other information would not. If shooter gets declines we don't know where they are going to join and until they join, they are invisible.
- Is there another benefit that I may have missed? This is how we reconcile the 12 shoots. Note the 12 shoots is to encourage visibility of club members w in the club environment. There are solo shooters that don't attend club days, isolated, culture, not welcome. The 12 shoots could be more to generate this club engagement. Most shooters attend the 12 shoots, when you have a discipline within a discipline ie

cowboy, or a range is only open seasonally, then you need visibility of the primary club, its members about also where they are shooting outside of the primary club.

- Sorry, not sure I follow the relevance of declined membership notification and the 12 shoots. Need to know where they are a member so we can link club and club calendar to the FAL and validate the same.
- Do you not get the 12 shoot info through Reg28GL? As above, if there was a clear reporting date for all shoots and calendar activity submission this would aid the process. There is no registry fix, its manual reconciling.
- What would the risk be if this requirement was removed? Audit of where the member is, who we approach for shooter detail, who we approach for the 12 shoots. Note that while the 12 shoot is a B endorsement responsibility, clubs collate which benefits TTP. A shooter could notify TTP manually 12 times over a 12 month period and the numbers are high if PNZ as an example asked their members to do this, the collation would be significant, so we work with clubs to collate, but take action against the individual which is where the act sits. If PNZ is successful in having 28GL removed, then this defaults to the shooter and our having to manage but we can't validate as we need to compare against the likes of the club calendar 28GO. PNZ advise that only 80% of clubs would participate in a single club calendar PNZ are thinking of making "it" one club". Currently club returns are summarised and will find error, essentially a count stating they had done 12 shoots. We don't have the ability to reconcile individual shooting attendance, by day, by club submission (3500 members x 300 plus shooting days x 12 plus shoots) so we leave this to the club. We do get false returns and while not common is significant Chch pistol club 300 plus members using the entrance gate fob as a count. LOA summarised and describes the collation at club level for the total shoots, even with the existing LOA, we still received the "inaccurate" chch return.
- Have you had any reporting yet about declined memberships? If so, what type of reasons have been given? No we don't have this.

As an aside, re declining membership generally, Adhoc yes but nothing formal. PNZ thought they would lose 40% post the regs as the clubs don't have travelling members, so don't need the wider membership for cross competition, they just want to shoot and the leg is complete so no value in membership. This is a general foundation reason for the non-affiliated.

Sorry, my question was about declined membership ie Reg 28(2)(b), not declining membership. Do you have any reporting on this? No it's not common. We will get club closures as the dynamics change and range closure as people move on, or range operates can't maintain the range safely (Akitio).

For us, re reducing the admin burden, noting we have not got the capacity to check all the Incorporated listing, clubs could just tell us if there is a change against the original submission and what the change is (officers), primarily the contact person but post an event if critical TTP could locate the information. From a compliance regulatory position we need to inform someone who is correctly in charge re any consequence.

To provide additional context re Pistols, again we have an older model for pistol reporting which may be fit for purpose, but the environment has changed and the risk across other shooter clubs increased as they become more prevalent. ie long distance shooters, pistol clubs are no longer exempt nor minimised through the introduction of other risk. The model for pistol club reporting is against the act to monitor compliance against the current leg, we need the calendars, need the 12 shoots to validate. Removing one negates the other. If we didn't pursue the 12 shoots, there would be minimised requirements to report or event attend a range or maintain records. Despite the leg, increased visibility and B endorsement licence responsibility, we have a **10% failure** rate now for pistol shooters not attending their 12 shoots, so they are in possession of handguns but minimal visibility and possibly no use. That risk needs to be understood. There is minimal influence by PNZS over their membership and meeting these requirements other than a news letter comment.

I understand the need to monitor the 12 shoots, but I'm unclear how many of the other requirements relate to the 12 shoots and how they might help to reduce the failure rate further. We audit and carry out a resolution process to steer compliance. Last year was a mixed year with a short calendar. Many shooters are 2nd or 3rd year offenders but the previous poor compliance model allows slippage, not now the case given the resolution is centralised.

Ngā mihi nui

PGR

Inspector Peter (PGR) Baird

Manager, Compliance Services

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Te Tari Pūreke

Firearms Safety Authority

<https://www.firearmssafetyauthority.govt.nz>

[]

From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>

Sent: Monday, 11 March 2024 11:30 am

To: BAIRD, Peter <Peter.Baird@police.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; s.9(2)(g)(ii)
[REDACTED]; MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>

Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Kia ora koutou,

Your views last week on non-pistol clubs and ranges, and where administrative savings could be made were really helpful.

I wanted to test some ideas for **pistol clubs**. The minister has agreed, in principle, to retaining the current requirements for pistol clubs. However, we endeavoured to provide options for ways to lighten the administrative burden on pistol clubs.

If you have notification that the pistol club is incorporated – ie you would be able to cross-check on the Incorporated Societies Registry:

Club's constitution/rules or any updates to it (Reg 28GA(1)(a) and Reg 28GO(1)(a))

- What are the benefits to having these?
- What would be risks be if this was removed?

A copy of the AGM minutes or minutes of its inaugural meeting (Reg 28GA and Reg 28GO(1)(c))

- What are the benefits to having these?
- What would be risks be if this was removed?

Aims and objectives of the club in the application (Reg 28F(1)(i))

- What are the benefits to having these?
- What would be risks be if this was removed?

Officers of the club (Reg 28G(1)(e))

- If you have a list of members (Reg 28GA(2)), do you need to this extra layer of detail – knowing who are officers of the club (and bearing in mind this will be a requirement of the incorporated societies Act too)?
 - I'm wondering if this is connected to Reg 28GF – so could a member of a pistol club have had a firearms licence revoked within the past 5 years?

- If so, what's the reason you would want only members who have held a licence for 5+ years being committee members/officers?
- What would be risks be if this was removed?
- (Same question of non-pistol clubs, what's the reason for only people with who have held a licence for 5+ years being committee members/officers – what's the risk if this was removed?)

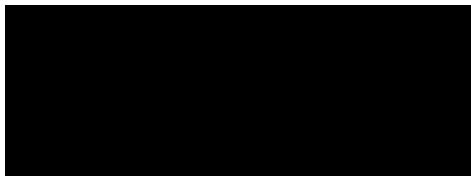
Declined membership (Reg 28GE(2)(b)?

- Thanks for explaining why it's helpful to know if pistol shooters are not members of clubs, as it goes to their endorsement. In the scenario you explained below, it's helpful to know if a shooter is ceases to be a member of club A and is then declined membership of club B, as you would know they are no longer fulfilling the requirements to have their endorsement. Would you achieve the same just with the requirement to update on members joining and members leaving? ie club A would have given you information that the person's has left the club and you would then not have got any information from another club that the same person joined.
- Is there another benefit that I may have missed?
- What would the risk be if this requirement was removed?
- Have you had any reporting yet about declined memberships? If so, what type of reasons have been given?

I'd really appreciate your thoughts on these questions.

@BAIRD, Peter – thanks for the email about the 12-shoot requirement. I'll respond in that email directly.

Ngā mihi
Fiona



Fiona Alexander
Principal Advisor – Harm Reduction and Public Safety
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From: BAIRD, Peter <Peter.Baird@police.govt.nz>

Sent: Tuesday, 5 March 2024 2:56 pm

To: TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; s.9(2)(g)(ii)
Alexander, Fiona <Fiona.Alexander@justice.govt.nz>; MCILRAITH, Michael (Mike)
<Michael.McIlraith@police.govt.nz>

Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Fiona

Discussed with Mike T and agree with his summation.

Ngā mihi nui

PGR

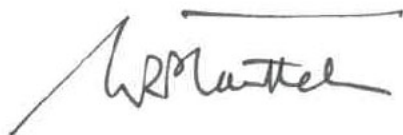
Inspector Peter (PGR) Baird
Manager, Compliance Services
M s.9(2)(a) OIA
E Peter.Baird@police.govt.nz

<https://www.firearmssafetyauthority.govt.nz>

[]

From: TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>
Sent: Tuesday, 5 March 2024 2:45 pm
To: **s.9(2)(g)(ii)**; Alexander, Fiona <Fiona.Alexander@justice.govt.nz>;
MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Cc: BAIRD, Peter <Peter.Baird@police.govt.nz>
Subject: FW: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

I have been through Supt McIlraith's responses and have made a further addition in green below for your consideration.
Thank you.



Senior Sergeant Mike Tarttelin
Manager Clubs and Ranges

📞 wk cell: **s.9(2)(a) OIA**
✉ Email: michael.tarttelin@police.govt.nz

From: MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Sent: Tuesday, 5 March 2024 1:49 PM
To: BAIRD, Peter <Peter.Baird@police.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>
Cc: **s.9(2)(g)(ii)**; Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Subject: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Gents

As below. Note the questions below and my response. If you can consider the same questions and provide your views, whether aligned to mine or not please. Response direct to Fiona with cc to all please.

Kind regards,

Mike

Mike McIlraith
Kaihautū Kōtui | Director Partnerships
Te Tari Pūreke | Firearms Safety Authority
E michael.mcilraith@police.govt.nz



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From: MCILRAITH, Michael (Mike)
Sent: Tuesday, 5 March 2024 1:47 pm
To: 'Alexander, Fiona' <Fiona.Alexander@justice.govt.nz>
Cc: s.9(2)(g)(ii)
Subject: Feedback: [EXTERNAL] Following up on clubs/ranges

Hey Fiona

Great to catch up last week and will pass on questions as below to Pete and Mike T. My thoughts are below in red.

Kind regards,

Mike

Mike McIlraith
Kaihautū Kōtui | Director Partnerships
Te Tari Pūreke | Firearms Safety Authority
E michael.mcilraith@police.govt.nz



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From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Sent: Monday, 4 March 2024 8:58 pm
To: MCILRAITH, Michael (Mike) <Michael.Mcilraith@police.govt.nz>
Cc: s.9(2)(g)(ii)
Subject: RE: Response: [EXTERNAL] Following up on clubs/ranges

Kia ora Mike,

Thanks very much for the time the other day. I took notes, but it would be really useful to follow up with some specific questions. Please share with Pete and Mike.

s9(2)(f)(iv) OIA

This will help me better understand the

benefits/risks if there's any suggestion made to remove some of the requirements or if that's what is asked. I'm particularly thinking about clubs that are not incorporated societies. The Arms legislation requirements places a lot of requirements around how they are organised (e.g. pre-supposing there would be a committee – reg 28GF; officers – reg 28G; AGMs – reg 28GA etc.)

Aims/objectives et of the club - Reg 28G(1)(i)

- Separate to the requirement to provide details of the shooting discipline of the club, what's the benefit to Police of knowing the aims/objectives/proposed activities of the club? **Setting aside pistol target shooting, something we could give away. Outside of this requirement it would be relatively easy for us to find out what activities are done. This can likely be achieved through open source searches or reaching out across the community, or just asking the club. Agree**
- What would be the concerns if this requirement wasn't part of the approval process? **Outside of pistol target shooting, nothing. Agree**

The requirement to provide a copy of minutes – either for approval or in the annual report (reg 28GA or 28GO)

- What is the thinking behind Police requiring a copy of minutes ie what's the benefit? **Likely we were seeking to ensure structure and process was in place, thereby ensuring ownership (thought committee structure) of club operation. This is great for club that have engaged with us and are part of the mainstream disciplines. There are many hunting clubs and the like out there and I doubt that they have come in seeking recognition. Outside of knowing ownership and structure is in place I doubt there are any real benefits. Agree**
- What would be the concerns if this requirement was removed? **To not have this requirement wouldn't have any noticeable impact. Agree**

The requirement to provide a copy of the club's constitution or rules – Reg 28GA

I understand that clubs that are incorporated would have a constitution because of the requirements in the Incorporated Societies Act. Clubs that are not wouldn't necessarily have this (before they were required as part of these changes). So, I'm interested in exploring:

- What is the thinking behind Police requiring this ie what's the benefit? **Likely just the same as the question/response above. Knowing that there is structure, rules and requirements of members. From my limited understanding these can be relatively vanilla. When in place these would give clubs the ability to exit 'problem members' which is helpful for the club as they could say "Te Tari Pūreke / legislation' require us to have this in place and now that we do, and because you (problem member) aren't behaving/meeting expectations, then they could be exited. Exit is good for the club but may not bubble up to use for visibility of the issue or problematic member. Agree**
- What would be the concerns if this requirement was removed? **More of a club impact than for us. To make this voluntary for clubs would likely be an okay outcome as we would promote it as a mechanism to deal with any member issues and exiting if ever required. We could recommend this through our information and education approach/effort. Really we want to know about problem members but this section doesn't really contribute to that as we still rely on clubs to contact us. Not sure if Pete/Mike T have any stats on clubs notifying of issue members as yet. Agree**

Requirement to maintain list of members and firearms licence – Reg 28GE

- What are the benefits of knowing the licence numbers of all club members? Particularly as non-club members can shoot with the club. **I think that they should have a list and make available on request. This said, if it didn't exist I am sure that any investigation that was criminally focused could/might have grounds (based on circumstances – every event being different) to get a search warrant for club info; very low likelihood needed, I suspect.**
- What would be the concerns if this requirement was removed? **I think this would be safe to remove. Agree**

Notification of declined membership – Reg 28GE(2)(b)

- What's the benefit of this for Police? **I think that this is likely to be constitution / incorporated society linked and more about managing left over firearms and ammo disposal if closing properly. As all firearms will be in the registry by 2028 then I don't see a need for this. Reg 28GE(2)(b) refers specifically to pistol clubs and enables FSA to track a 'B' endorsement holders condition requiring them to be a member 'of an incorporated pistol shooting club that holds a certificate of approval', Arms Act 29(2)(a) . A scenario could be**

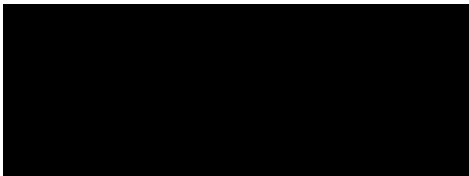
that an 'B' endorsement holder may have resigned from a club and then had his membership application declined at another club leaving them no longer a member of any club then not meeting a condition of his endorsement.

- What might the consequence (for the club) be of not providing this information? ie lost approval? **Safe to remove. Consideration to leave. Agree**

I recall it was mentioned that one way the burden could be lifted would be to remove the reporting requirement on clubs – annual reporting requirement under section 38K and 28GO – and instead to say that annual reports should be made available if requested. I've reflected that perhaps this does not really lessen the regulatory burden on clubs – if they still have to maintain the information, it would only be the last step of providing that to Police that would be removed. Any thoughts on this? **I think the outcome we want from clubs is to 1. Have visibility that they exist, 2. If they are connected to a range, and 3. That they report issues, risks, individuals of concern to us for consideration of what (any) action we might want to take. Agree**

It would be really helpful to have your thoughts down, as I continue to work through the analysis. Happy to answer any questions, if that's helpful.

Ngā mihi
Fiona



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From: MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Sent: Tuesday, 27 February 2024 10:16 am
To: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Cc: **s.9(2)(g)(ii)**
Subject: Response: [EXTERNAL] Following up on clubs/ranges

Hey Fiona

I see **s.9(2)(g)(ii)** has responded on numbers. I have provided a couple of points below but will share your questions with Mike T and Pete so that they are prepared for tomorrow 😊

Kind regards,

Mike

Mike McIlraith
Kaihautū Kōtui | Director Partnerships
Te Tari Pūreke | Firearms Safety Authority
E michael.mcilraith@police.govt.nz



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From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Sent: Tuesday, 27 February 2024 9:29 am
To: MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Cc: **S.9(2)(g)(ii)**
Subject: RE: Response: [EXTERNAL] Following up on clubs/ranges

Kia ora Mike,

As a follow up, tomorrow, I'd also like to discuss and understand the updated position in respect of clubs/ranges that have applied to be approved/certified. I thought it might be helpful to set out some questions ahead of tomorrow.

The January Part 6 briefing had the following information:

300 other (non-pistol) shooting clubs,
 278 applications have been approved
 22 clubs yet to be approved, but continue to operate (Police awaiting documentation or payment)

1285 ranges in operation
 476 are fully certified
 809 range applications are being processed

Are these figures still accurate?

I understand that for clubs/ranges operating before the changes came into effect, so long as they have made an application, they continue to operate. **Correct.** Will this transitional situation exist indefinitely (until all steps are taken to approve or a decision is made not to approve the applications)? **An end point would come. But before we got there the C&R team would work with the club to resolve issues to encourage the club to be successful with their application. However, if despite all reasonable efforts the club didn't come up to requirements then an outcome would likely be refusal.**

If a club has applied for approval but is waiting receiving their approval, do they have to comply with the ongoing requirements as if they were approved? **From memory yes, but Mike T and Pete will be able to confirm.**

I'm keen to chat about what steps, if any, are being taken to support clubs/ranges through the process of being approved/certified. **The C&R team have done a lot here. This work really started in 2020 when Pete established a working group around ranges. After the range aspect was well advanced attention was then able to be given to the club requirement. Part of our challenge with clubs was waiting for the regulations to be agreed. But Mike T and Pete will be well placed to answer in detail.**

Ngā mihi

Fiona

Fiona Alexander
Principal Advisor – Harm Reduction and Public Safety
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Tel: **S.9(2)(a) OIA**

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To: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Subject: RE: Response: [EXTERNAL] Following up on clubs/ranges

Hi Fiona

As you will have seen Char from my team will sort out a meeting for us. Really good to meet and discuss this and thanks for that opportunity. Could you craft a few bullet points (or lift and shift points already noted below) so that Mike T and I have a clear view of discussion points please.

Kind regards,

Mike

Mike McIlraith
Kaihautū Kōtūi | Director Partnerships
Te Tari Pūreke | Firearms Safety Authority
E michael.mcilraith@police.govt.nz



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From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Sent: Thursday, 22 February 2024 10:59 am
To: MCILRAITH, Michael (Mike) <Michael.Mcilraith@police.govt.nz>
Subject: RE: Response: [EXTERNAL] Following up on clubs/ranges

Kia ora Mike,

Thanks for providing initial responses to my queries. It's really helpful.

A teams call next week would be great. As well as discuss the questions I set down here, I'd also like to explore what options there are for lifting the regulatory burden on clubs. In terms of analysing options, I'm considering what could be put forward as "status quo light" eg regulation, but with fewer requirements than there currently is on clubs.

You might already know of requirements that could be removed and the pros/cons of that.

In terms of my availability, Monday afternoon after about 1pm would be ok, Tuesday is free all day. Let me know if there's a good time somewhere then. Happy to meet in person or online – I'm sorry, I cannot remember where you are all based!

Ngā mihi
Fiona

Fiona Alexander
Principal Advisor – Harm Reduction and Public Safety



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From: MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Sent: Thursday, 22 February 2024 10:45 am
To: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Subject: Response: [EXTERNAL] Following up on clubs/ranges

Hey Fiona

Always great to meet in person. I feel for you and the team as with an existing workload you now have so much more to do. Funnily (not), Police went through that pain of trying to fit firearms in around other things and that didn't work, hence they established a dedicated firearms policy team. Anyway, hope you're all able to keep your heads above water 😊

Thanks for sending through the questions below

Kind regards,

Mike

Mike McIlraith
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From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Sent: Wednesday, 21 February 2024 4:44 pm
To: MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Subject: [EXTERNAL] Following up on clubs/ranges

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Kia ora Mike,

I hope you're well. It was good to meet you in person at TTP.

I'm reaching out to ask if you could put me in contact with someone. I'm progressing analysis of the Part 6 side of things and I'm looking for information to help fill some gaps in my knowledge.

I remember that a couple of the clubs/ranges people were on holidays – but I cannot remember when! – so I thought I'd reach out and ask if you could let me know who to contact. **Mike T is back on deck next week. Can I set up a Teams call for us to connect?**

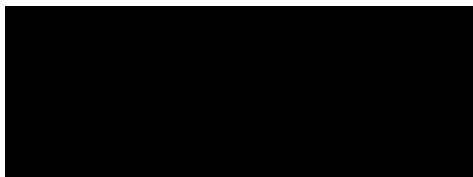
I'll likely have questions as I go, but the first one few I wanted to ask were these:

1. I'm trying to explore how effective the changes on clubs have been. This is separate to the changes relating to ranges (although I know there are connections – so it may not be easy to separate!) **Noted and good to separate as you are correct, they are very different things.** This may be difficult to assess given that the regulations are fairly new. But I wonder:
 - Is there any data yet on the way the regulations on clubs are working? For example, has there been any information provided yet about safety incidents that Police wouldn't have had but for the changes? Or about storage requirements? **Nothing that I am aware of but we'll get C&R to answer.**
 - Is there any other info that you think would be useful for me to know to understand the benefits of regulating clubs (again, separate to ranges – for which I know there is the info about how many have been issued with improvement notices to bring them up to standard). **My view is that we are now up and going and the community has moulded to the new world. I do think that in the long term the current regulatory settings might help with safety interventions is probable. I think this because we are playing a long game to really see benefits, much like with the Australians really seeing benefits 20 years after the 1996 Port Arthur event. With the complication of club guns and ammo being provided and the exemption to requiring a dealer licence unpicking this would be a painfully long journey.**
2. Would it be fair to say that because there was no regulation of non-pistol clubs before the changes, the amount of information known about them before was limited? **Correct. Some basic understanding through FCAF members and some visits, but nothing documented or substantial that would be useful in any way.**
3. Do you know how many non-pistol clubs were incorporated before there was the requirement for them to be incorporated (if the sell firearms/ammunition)? **Don't know. I suspect not many as not sure what the benefit could have been to them as many had and provided firearms and ammunition with no legislative requirements pre-changes. We could ask FCAF if that was helpful? If we did that we would just need the wording of the request and my team will put out and provide responses in a bundle for you.**
4. This may not be possible, but, is there any way of estimating how many *new* clubs we might expect in the future? **This would be too difficult to determine. We promote club membership but I would also note that they are mostly in our urban areas. Small bore clubs struggle for membership, where clay shooting probably do okay and there is a mixed bag for the rest. Clubs (likely more about the range that the club owns or has access to) would, in my assessment or urban licence holders, be about having somewhere to go to zero a rifle before a hunt and not about competitions; competition attendees are a lesser number. Of course, the main burden to become an approved club is at the beginning, and the ongoing obligations are lower. Agree. So much of the 'pain' for existing has finished. Given that, as far as you are aware, clubs have complied and have made applications to be approved, I'm wondering how many more might have to go through the initial approval process (I know that some might amalgamate, which could result in a new application). We will ask C&R team. As I say, it may just be impossible to tell, but if you have any way of estimating, that could be helpful.**
5. Also, do you have any particular contact at Companies House re incorporated societies? **No. But I know COLFO have written to them and had a response. I have asked my COLFO contact for details on who they have been dealing with. Will let you know once I hear back.** I'd like to understand exactly what personal information is published online and whether any exception could be created.

As I say, I'm likely to have some more questions along the way, but these are the ones I've been grappling with right now!

Happy to chat if that's easiest – I'm on **s.9(2)(a) OIA**, or we can arrange a Teams call.

Ngā mihi
Fiona



Fiona Alexander
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BARR, Danielle

From: BAIRD, Peter
Sent: Wednesday, 13 March 2024 12:57 pm
To: Alexander, Fiona; TARTTELIN, Michael; s.9(2)(g)(ii); MCILRAITH, Michael (Mike)
Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Afternoon

F/Y for clubs can be any month (any clubs) some are aligning to the state fiscal year, other don't, then we have the 5 month free good in which they have to submit a return.

If a club conducts the activity on their range / or any range, they may not be the range operators, but the club is running the shoot (note most ranges are run by clubs). The club is recording the attendance. This section is in part about the people undertaking one of the 12 shoots, but also records anyone who participates ie visitors family. This is where clubs see this as a burden.

Noting it would be difficult to find a non-club person details if there was a need for an investigation, but we don't get a lot of these. This is different to our wanting to see who is visiting a shooting business ie head-hunter episode which we resolved through photos (non-pistol range does not have to record attendance).

We have used this section to validate a pistol club 12 shoots at another range, and having made those enquires, established that they had not shot despite the return stating that they had but it's a balance against our ability to manage and enquire / analyse, which we don't, the benefit / reward v risk and club burden

Ngā mihi nui

PGR

Inspector Peter (PGR) Baird
Manager, Compliance Services
M s.9(2)(a) OIA
E Peter.Baird@police.govt.nz



Te Tari Pūreke
Firearms Safety Authority

<https://www.firearmssafetyauthority.govt.nz>

[]

From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Sent: Wednesday, 13 March 2024 12:29 pm
To: BAIRD, Peter <Peter.Baird@police.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; s.9(2)(g)(ii); MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Kia ora Pete,

Thanks very much for this. It's useful to consider how to reduce the burden on pistol clubs.

Can I confirm, are the financial years for clubs July/June?

Could you also explain a bit more about why this existing requirement is particularly burdensome for the clubs? This would help if we propose it as a solution.

Ngā mihi
Fiona

Fiona Alexander
Principal Advisor – Harm Reduction and Public Safety
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From: BAIRD, Peter <Peter.Baird@police.govt.nz>
Sent: Wednesday, 13 March 2024 12:18 pm
To: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>;
s.9(2)(g)(ii); MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Afternoon Fiona

s.9(2)(f)(iv) OIA

Ngā mihi nui

PGR

Inspector Peter (PGR) Baird
Manager, Compliance Services
M s.9(2)(a) OIA
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Te Tari Pūreke
Firearms Safety Authority

<https://www.firearmssafetyauthority.govt.nz>

[]

From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Sent: Wednesday, 13 March 2024 8:28 am
To: BAIRD, Peter <Peter.Baird@police.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; s.9(2)(g)(ii);
s.9(2)(g)(ii); MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Kia ora Pete,

This is really helpful info. Thank you.

Ngā mihi
Fiona

Fiona Alexander

Principal Advisor – Harm Reduction and Public Safety
Policy Group

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From: BAIRD, Peter <Peter.Baird@police.govt.nz>

Sent: Wednesday, 13 March 2024 8:10 am

To: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>;
s.9(2)(g)(ii) MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>

Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Morning Fiona

Is there any data yet on the way the regulations on clubs are working? For example, has there been any information provided yet about safety incidents that Police wouldn't have had but for the changes? Or about storage requirements

Submission from Mike and Pete

No, we are in our first 8 months of the regs and while we completed all the club approvals (11 yet to receive certificates as they haven't paid). Unless a club has a range we are not legislatively supported to conduct an inspection. Most clubs virtually exist unless there is a range attached, so we don't do "club visits" and the legislation provides for their reporting into TTP. We are currently just now undertaking visits to non-pistol clubs "if" they have a range. The incident register is a record not a report.

The second factor is, given our knowledge of the shooter disciplines, that while the intent was to project a CAA based principle of positive reporting of incidents, thus adding safety and conduct improvement, it's unlikely that incidents will be recorded unless it's an injury.

There is no specificity in the leg to describe what is an incident and what should be recorded. Its more relevant but equally unlikely that the Shooting Range Operator will complete an incident record.

- We currently have a quantity of pistol clubs that have failed to report their annual reports (28GO) and are outside the 5 months after the end of their FY. Given the environment, we will have a conversation with PNZ. All are subject to an improvement notice.
- Additionally, an initial scope of the Incorporated Society Register has identified that there are pistol clubs that are reporting as selling ammo but given pistol clubs did not have to make a new application on the introduction of the legs we relied on PNZ data. They show a lesser number. Ammo selling by a club attracts a higher club fee, they could be subject to an Improvement Notice.

We are going to discuss options re the above bullets with our Legal Team as its new ground

Ngā mihi nui

PGR

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□

From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>

Sent: Tuesday, 12 March 2024 3:25 pm

To: BAIRD, Peter <Peter.Baird@police.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; s.9(2)(g)(ii)

MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>

Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Kia ora koutou,

Sorry, following up on one thing. In my very first email of this chain – a while ago, I know! – I asked:

- Is there any data yet on the way the regulations on clubs are working? For example, has there been any information provided yet about safety incidents that Police wouldn't have had but for the changes? Or about storage requirements? **Nothing that I am aware of but we'll get C&R to answer.**

Mike M's comment in red.

Pete/Mike T, is there any information you are aware of that could be helpful here?

Ngā mihi

Fiona Alexander

Principal Advisor – Harm Reduction and Public Safety

Policy Group

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From: Alexander, Fiona

Sent: Tuesday, 12 March 2024 3:08 pm

To: 'BAIRD, Peter' <Peter.Baird@police.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; s.9(2)(g)(ii)

MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>

Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Kia ora koutou,

Apologies for the delay. I wanted to acknowledge your response – thank you very much for the time.

I know that Jenna has scheduled an opportunity to discuss next week, by which point you should have a draft of the briefing. I look forward to discussing then, if not before!

Ngā mihi
Fiona

Fiona Alexander

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From: BAIRD, Peter <Peter.Baird@police.govt.nz>

Sent: Tuesday, 12 March 2024 8:25 am

To: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>;

s.9(2)(g)(ii) MCILRAITH, Michael (Mike) <Michael.Mcilraith@police.govt.nz>

Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Morning Fiona

Comment from myself and Mike

In respect to our not having a system. While the legislation provided a mechanism to undertake the function, the due date for the calendar year for matters under 28GO (1) and (2) are not due until 5 months after their FY. While its normal for Police to have all matters required by legislation to be prepared at the time the legislation falls due, other matters including functionality of a suitable system have been developed as there has not been a need to date although discussions are in process on how this would be managed.

s. 9(2)(f)(iv)

What has become apparent is that the LOA is critical to the reg interpretations by members who don't have a reg understanding and there is a poor connect between PNZ and its members (clubs) The LOA is not available at this time.

Additional the LOA should assist clubs through TTP providing a single audit sheet that can be used at a club and TPP (C&R level) given the audit solution is not electronic in the registry and PNZ are reluctant to assist coordinating the same.

Clarity in plain language through the LOA that all returns be they 12 shoots (28 July) or club calendar (five months after club FY which is not standard) an improvement in the reg language and submission within a short time frame post the July FY would be of benefit and ensure a short window for regulatory compliance oversight and influence. We don't have any issues with the 4 non-affiliated pistol clubs, we don't have LOA's with these.

There is a clear separation between club requirements and range operator requirements.

s. 9(2)(f)(iv)

s.9(2)(g)(ii) is looking at coordinating a further workshop next week

Ngā mihi nui

PGR

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[]

From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Sent: Monday, 11 March 2024 3:36 pm
To: BAIRD, Peter <Peter.Baird@police.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; s.9(2)(g)(ii)
MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Kia ora Pete,

Thanks very much for your feedback on these questions. I've got a few follow ups, please.

In a couple of places, you've said 'noting we don't currently have a system'. Do you mean by this that you don't have a system currently for checking constitution/AGM minutes etc? If so, and thinking about the Minister's priorities to reduce the admin burden, do you think this could indicate requirements that could be removed? In other words, indicating that the requirement is not as useful. Alternatively, if you did have a system, what is the information that you would be taking from eg. the constitution or AGM minutes that would be helpful to Police?

I've also added a few comments in green to clarify. Bearing in mind the Minister's priority to reduce duplication, I'm keen to test whether some of these requirements are really duplicated in the requirements for range certification. Maybe there is something I've not mentioned? Are there requirements that could be done away with?

Ngā mihi
Fiona

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From: BAIRD, Peter <Peter.Baird@police.govt.nz>

Sent: Monday, 11 March 2024 12:51 pm

To: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>;

s.9(2)(g)(ii) MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>

Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Fiona

Responses below from mike and myself

Club's constitution/rules or any updates to it (Reg 28GA(1)(a) and Reg 28GO(1)(a))

- What are the benefits to having these? **How they control membership , Introduction of criminal element into range environment as Arms act tightens access, type of shooting, techniques of shooting, range configuration and the introduction of dynamic shooting or alternative target acquisition, type of firearm, frequency of range use, hours of operation against Consents. These matters creep between constitution and club objectives and finally range certification**
- What would be risks be if this was removed? **Lack of oversight, noting we don't currently have a system , we could for incorporated, see this on the society register, we don't currently check these through the society, don't have the capacity, new changes don't show where such changes occur**
 - Re the "new changes" not showing where such changes occur. Do you mean new changes in the Arms Act or Incorporated Societies Act? Arms Act
 - In terms of a criminal element coming into the range environment, what do you expect to see in a constitution which would tell you this? Over and above a list of members where you can check names? Processes for vetting new members. There are processes for pistol as I they need the B, which is "vetted" on the B application. Note if your joining a A cat shooting club, there is no vetting as to suitability. Deer stalkers have used the existence of a FA licence as a bench mark for membership as the applicant has passed the F& P test but you can join without the FAL and be provided with a FA and be taught to shoot
 - Would what you are looking for – type of firearm, frequency of range use etc – not be covered in the range certification/standing order? You mention that they creep between – if they are definitely needed, could the requirements for ranges clearly state these are needed for certification? While there is clear separation between a range operator and a club/ the creep occurs when styles and firearms are introduced through a club and the only stop gap is well past the introduction this being the certificate on a range as opposed o at the front end. Hawkes Bay Roy's Hill changed calibre because of shooting need, which changed the ballistics later for the range, range was not certified for this and had to be retro'd

A copy of the AGM minutes or minutes of its inaugural meeting (Reg 28GA and Reg 28GO(1)(c))

- What are the benefits to having these? Visibility of committee updating NIA re a contact but limited. **Visibility of criminal element into range environment as Arms act tightens access. Post the chch shooting Police have limited understandings to what clubs were in existence and what they were doing. It was a massive audit and remains inaccurate as without the leg we didn't understand who was operating a shooting club or where. I guess it's a decision for govt if they see this as being important. Equally a criminal group could establish shooting club and conduct shooting activity on a range with no oversight.**
- What would be risks be if this was removed? **Introduction of criminal element into the range scene, Lack of oversight, noting we don't currently have a system**
- Again, in terms of a criminal element coming into the range environment, what do you expect to see in minutes which would tell you this? We wouldn't see this in the AGM minutes, maybe vetting processes, or rules around access and use of the range by externals (head hunter example to be discussed) Will show you the pics and Intel on this type of thing. Both examples have gang members using the ranges for shooting practice. One is a PNZ member giving instruction privately, the other a business .

Aims and objectives of the club in the application (Reg 28F(1)(i))

- What are the benefits to having these? Scope as to the clubs intent. Previously unregulated , categorising what the club intends to operate as , so a risk lens can be applied. Knowing what they intend to shoot and how ensures the right level of oversight and inspection and risk is applied.
- What would be risks be if this was removed? Clubs may and they do expand through memberships and members wishing the undertaken direct disciplines and dynamic shooting (they have seen it somewhere). This is where we saw the expansion and separation of pistol clubs to focus on a particular type of shooting ie cowboy and IPSC
 - Noting that there is no requirement to update on the aims/objectives of the club through Reg 28GO, how would you know if a club has expanded/changed in the way you talk about through their aims/objectives? AGM minutes if we were looking and knew what to look for
 - Perhaps you could get this from Reg 28GO(2)(c) and(d) instead? Maybe but tis only relates to Pistol clubs, not a range operator.

Officers of the club (Reg 28G(1)(e)?

- If you have a list of members (Reg 28GA(2)), do you need to this extra layer of detail – knowing who are officers of the club (and bearing in mind this will be a requirement of the incorporated societies Act too)? Lack of oversight, noting we don't currently have a system. We would need a system that held the current officers details and then compare against new officers. It's a benefit v cost (risk) see above intro
 - Again, if you have a list of members, what's the oversight required of the officers? What's the real benefit of this oversight? Gives us an idea as to who is running and steering the club
 - I'm wondering if this is connected to Reg 28GF – so could a member of a pistol club have had a firearms licence revoked within the past 5 years? It could be but again we don't currently apply oversight , and require clubs to be aware of the same as opposed to us checking, too many clubs pros cons to undertake this for which there may be little gain. If we have the leg but not reporting , we would undertake on an audit or intel basis only, which we are in agreement for . Don't have to be a licence holder to be a member of a club, you just cant shoot
 - If so, what's the reason you would want only members who have held a licence for 5+ years being committee members/officers? Not fit and proper, done something in conflict to the act 24A Officer of a club does not have to have FA licence, no 5 year reference
 - But they could be members of the club and therefore shoot with the club? What's the distinction with not wanting them to be officers? If they are current FLH, they are fit and proper now.
- What would be risks be if this was removed? Same risk but we would not be able to check. We don't have the ability to check membership back to the constitution. Pistol clubs have to provide list of members
- (Same question of non-pistol clubs, what's the reason for only people with who have held a licence for 5+ years being committee members/officers – what's the risk if this was removed?) It does not say that , anyone can be a member or officer holder , don't need a FA licence unless revoked – thank you, I see where I've misread that requirement.

Declined membership (Reg 28GE(2)(b)?

- Thanks for explaining why it's helpful to know if pistol shooters are not members of clubs, as it goes to their endorsement. In the scenario you explained below, it's helpful to know if a shooter is ceases to be a member of club A and is then declined membership of club B, as you would know they are no longer fulfilling the requirements to have their endorsement. Would you achieve the same just with the requirement to update on members joining and members leaving? ie club A would have given you information that the person's has left the club and you would then not have got any information from another club that the same person joined. FAL leaves one and join another TTP reconcile this and if they don't appear in the new club, by notification, then TTP enquire. Note if someone leaves a club and tells us on the 27th day (required within 28 days) and then gets declined by the new club, we are not getting currency, ie waiting 28 days that he / she hasn't joined. Its uncommon, but a point. This could be gripped up through better controls and management by PNZ secretariat but there is not enough confidence that they could / would, club independence within PNZ and the current 5 non affiliated
 - Notification that a person's membership has been declined also has a 28 day time period, so I'm still not sure what this is getting you that the other information would not. If shooter gets declines we don't know where they are going to join and until they join, they are invisible.

- Is there another benefit that I may have missed? This is how we reconcile the 12 shoots. Note the 12 shoots is to encourage visibility of club members within the club environment. There are solo shooters that don't attend club days, isolated, culture, not welcome. The 12 shoots could be more to generate this club engagement. Most shooters attend the 12 shoots, when you have a discipline within a discipline ie cowboy, or a range is only open seasonally, then you need visibility of the primary club, its members about also where they are shooting outside of the primary club.
 - Sorry, not sure I follow the relevance of declined membership notification and the 12 shoots. Need to know where they are a member so we can link club and club calendar to the FAL and validate the same.
 - Do you not get the 12 shoot info through Reg28GL? As above, if there was a clear reporting date for all shoots and calendar activity submission this would aid the process. There is no registry fix, its manual reconciling.
- What would the risk be if this requirement was removed? Audit of where the member is, who we approach for shooter detail, who we approach for the 12 shoots. Note that while the 12 shoot is a B endorsement responsibility, clubs collate which benefits TTP. A shooter could notify TTP manually 12 times over a 12 month period and the numbers are high if PNZ as an example asked their members to do this, the collation would be significant, so we work with clubs to collate, but take action against the individual which is where the act sits. If PNZ is successful in having 28GL removed, then this defaults to the shooter and our having to manage but we can't validate as we need to compare against the likes of the club calendar 28GO. PNZ advise that only 80% of clubs would participate in a single club calendar PNZ are thinking of making "it" one club". Currently club returns are summarised and will find error, essentially a count stating they had done 12 shoots. We don't have the ability to reconcile individual shooting attendance, by day, by club submission (3500 members x 300 plus shooting days x 12 plus shoots) so we leave this to the club. We do get false returns and while not common is significant ChCH pistol club 300 plus members using the entrance gate fob as a count. LOA summarised and describes the collation at club level for the total shoots, even with the existing LOA, we still received the "inaccurate" ChCH return.
- Have you had any reporting yet about declined memberships? If so, what type of reasons have been given? No we don't have this.

As an aside, re declining membership generally, Adhoc yes but nothing formal. PNZ thought they would lose 40% post the regs as the clubs don't have travelling members, so don't need the wider membership for cross competition, they just want to shoot and the leg is complete so no value in membership. This is a general foundation reason for the non-affiliated.

Sorry, my question was about declined membership ie Reg 28(2)(b), not declining membership. Do you have any reporting on this? No it's not common. We will get club closures as the dynamics change and range closure as people move on, or range operates can't maintain the range safely (Akitio).

For us, re reducing the admin burden, noting we have not got the capacity to check all the Incorporated listing, clubs could just tell us if there is a change against the original submission and what the change is (officers), primarily the contact person but post an event if critical TTP could locate the information. From a compliance regulatory position we need to inform someone who is correctly in charge re any consequence.

To provide additional context re Pistols, again we have an older model for pistol reporting which may be fit for purpose, but the environment has changed and the risk across other shooter clubs increased as they become more prevalent. ie long distance shooters, pistol clubs are no longer exempt nor minimised through the introduction of other risk. The model for pistol club reporting is against the act to monitor compliance against the current leg, we need the calendars, need the 12 shoots to validate. Removing one negates the other. If we didn't pursue the 12 shoots, there would be minimised requirements to report or even attend a range or maintain records. Despite the leg, increased visibility and B endorsement licence responsibility, we have a **10% failure** rate now for pistol shooters not attending their 12 shoots, so they are in possession of handguns but minimal visibility and possibly no use. That risk needs to be understood. There is minimal influence by PNZS over their membership and meeting these requirements other than a news letter comment.

I understand the need to monitor the 12 shoots, but I'm unclear how many of the other requirements relate to the 12 shoots and how they might help to reduce the failure rate further. We audit and carry out a resolution

process to steer compliance. Last year was a mixed year with a short calendar. Many shooters are 2nd or 3rd year offenders but the previous poor compliance model allows slippage, not now the case given the resolution is centralised.

Ngā mihi nui

PGR

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[]

From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Sent: Monday, 11 March 2024 11:30 am
To: BAIRD, Peter <Peter.Baird@police.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; **s.9(2)(g)(ii)**
MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Kia ora koutou,

Your views last week on non-pistol clubs and ranges, and where administrative savings could be made were really helpful.

I wanted to test some ideas for pistol clubs. The minister has agreed, in principle, to retaining the current requirements for pistol clubs. However, we endeavoured to provide options for ways to lighten the administrative burden on pistol clubs.

If you have notification that the pistol club is incorporated – ie you would be able to cross-check on the Incorporated Societies Registry:

Club's constitution/rules or any updates to it (Reg 28GA(1)(a) and Reg 28GO(1)(a))

- What are the benefits to having these?
- What would be risks be if this was removed?

A copy of the AGM minutes or minutes of its inaugural meeting (Reg 28GA and Reg 28GO(1)(c))

- What are the benefits to having these?
- What would be risks be if this was removed?

Aims and objectives of the club in the application (Reg 28F(1)(i))

- What are the benefits to having these?
- What would be risks be if this was removed?

Officers of the club (Reg 28G(1)(e))

- If you have a list of members (Reg 28GA(2)), do you need to this extra layer of detail – knowing who are officers of the club (and bearing in mind this will be a requirement of the incorporated societies Act too)?
 - I'm wondering if this is connected to Reg 28GF – so could a member of a pistol club have had a firearms licence revoked within the past 5 years?
 - If so, what's the reason you would want only members who have held a licence for 5+ years being committee members/officers?
- What would be risks be if this was removed?
- (Same question of non-pistol clubs, what's the reason for only people with who have held a licence for 5+ years being committee members/officers – what's the risk if this was removed?)

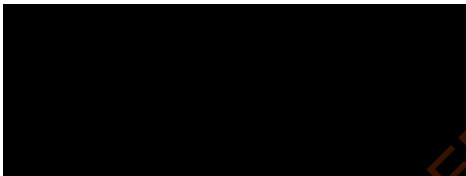
Declined membership (Reg 28GE(2)(b))?

- Thanks for explaining why it's helpful to know if pistol shooters are not members of clubs, as it goes to their endorsement. In the scenario you explained below, it's helpful to know if a shooter is ceases to be a member of club A and is then declined membership of club B, as you would know they are no longer fulfilling the requirements to have their endorsement. Would you achieve the same just with the requirement to update on members joining and members leaving? ie club A would have given you information that the person's has left the club and you would then not have got any information from another club that the same person joined.
- Is there another benefit that I may have missed?
- What would the risk be if this requirement was removed?
- Have you had any reporting yet about declined memberships? If so, what type of reasons have been given?

I'd really appreciate your thoughts on these questions.

@BAIRD, Peter – thanks for the email about the 12-shoot requirement. I'll respond in that email directly.

Ngā mihi
Fiona



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From: BAIRD, Peter <Peter.Baird@police.govt.nz>
Sent: Tuesday, 5 March 2024 2:56 pm
To: TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; s.9(2)(g)(ii)
 Alexander, Fiona <Fiona.Alexander@justice.govt.nz>; MCILRAITH, Michael (Mike)
 <Michael.McIlraith@police.govt.nz>
Subject: RE: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Fiona

Discussed with Mike T and agree with his summation.

Ngā mihi nui
PGR

Inspector Peter (PGR) Baird
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From: TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>
Sent: Tuesday, 5 March 2024 2:45 pm
To: **s.9(2)(g)(ii)**; Alexander, Fiona <Fiona.Alexander@justice.govt.nz>;
MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Cc: BAIRD, Peter <Peter.Baird@police.govt.nz>
Subject: FW: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

I have been through Supt McIlraith's responses and have made a further addition in green below for your consideration.

Thank you.

A handwritten signature in black ink, appearing to read 'Michael Tarttelin', with a horizontal line above it.

Senior Sergeant Mike Tarttelin
Manager Clubs and Ranges

📞 wk cell: **s.9(2)(a) OIA**
✉ Email: michael.tarttelin@police.govt.nz



From: MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Sent: Tuesday, 5 March 2024 1:49 PM
To: BAIRD, Peter <Peter.Baird@police.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>
Cc: **s.9(2)(g)(ii)** Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Subject: Views sought - Feedback: [EXTERNAL] Following up on clubs/ranges

Gents

As below. Note the questions below and my response. If you can consider the same questions and provide your views, whether aligned to mine or not please. Response direct to Fiona with cc to all please.

Kind regards,

Mike

Mike McIlraith
Kaihautū Kōtui | Director Partnerships
Te Tari Pūreke | Firearms Safety Authority
E michael.mcilraith@police.govt.nz



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From: MCILRAITH, Michael (Mike)
Sent: Tuesday, 5 March 2024 1:47 pm
To: 'Alexander, Fiona' <Fiona.Alexander@justice.govt.nz>
Cc: S.9(2)(g)(ii)
Subject: Feedback: [EXTERNAL] Following up on clubs/ranges

Hey Fiona

Great to catch up last week and will pass on questions as below to Pete and Mike T. My thoughts are below in red.

Kind regards,

Mike

Mike McIlraith
Kaihautū Kōtui | Director Partnerships
Te Tari Pūreke | Firearms Safety Authority
E michael.mcilraith@police.govt.nz



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From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Sent: Monday, 4 March 2024 8:58 pm
To: MCILRAITH, Michael (Mike) <Michael.Mcilraith@police.govt.nz>
Cc: S.9(2)(g)(ii)
Subject: RE: Response: [EXTERNAL] Following up on clubs/ranges

Kia ora Mike,

Thanks very much for the time the other day. I took notes, but it would be really useful to follow up with some specific questions. Please share with Pete and Mike.

As I spoke about the other day, I'm trying to understand what the pros/cons are of removing some requirements – to understand why the requirements are there in the first place. This will help me better understand the benefits/risks if there's any suggestion made to remove some of the requirements or if that's what is asked. I'm particularly thinking about clubs that are not incorporated societies. The Arms legislation requirements places a lot of requirements around how they are organised (e.g. pre-supposing there would be a committee – reg 28GF; officers – reg 28G; AGMs – reg 28GA etc.)

Aims/objectives et of the club - Reg 28G(1)(i)

- Separate to the requirement to provide details of the shooting discipline of the club, what's the benefit to Police of knowing the aims/objectives/proposed activities of the club? **Setting aside pistol target shooting, something we could give away. Outside of this requirement it would be relatively easy for us to find out what activities are done. This can likely be achieved through open source searches or reaching out across the community, or just asking the club. Agree**
- What would be the concerns if this requirement wasn't part of the approval process? **Outside of pistol target shooting, nothing. Agree**

The requirement to provide a copy of minutes – either for approval or in the annual report (reg 28GA or 28GO)

- What is the thinking behind Police requiring a copy of minutes ie what's the benefit? **Likely we were seeking to ensure structure and process was in place, thereby ensuring ownership (thought committee structure) of club operation. This is great for club that have engaged with us and are part of the mainstream disciplines. There are many hunting clubs and the like out there and I doubt that they have come in seeking recognition. Outside of knowing ownership and structure is in place I doubt there are any real benefits. Agree**
- What would be the concerns if this requirement was removed? **To not have this requirement wouldn't have any noticeable impact. Agree**

The requirement to provide a copy of the club's constitution or rules – Reg 28GA

I understand that clubs that are incorporated would have a constitution because of the requirements in the Incorporated Societies Act. Clubs that are not wouldn't necessarily have this (before they were required as part of these changes). So, I'm interested in exploring:

- What is the thinking behind Police requiring this ie what's the benefit? **Likely just the same as the question/response above. Knowing that there is structure, rules and requirements of members. From my limited understanding these can be relatively vanilla. When in place these would give clubs the ability to exit 'problem members' which is helpful for the club as they could day "Te Tari Pūreke / legislation' require us to have this in place and now that we do, and because you (problem member) aren't behaving/meeting expectations, then they could be exited. Exit is good for the club but may not bubble up to use for visibility of the issue or problematic member. Agree**
- What would be the concerns if this requirement was removed? **More of a club impact than for us. To make this voluntary for clubs would likely be an okay outcome as we would promote it as a mechanism to deal with any member issues and exiting if ever required. We could recommend this through our information and education approach/effort. Really we want to know about problem members but this section doesn't really contribute to that as we still rely on clubs to contact us. Not sure if Pete/Mike T have any stats on clubs notifying of issue members as yet. Agree**

Requirement to maintain list of members and firearms licence – Reg 28GE

- What are the benefits of knowing the licence numbers of all club members? Particularly as non-club members can shoot with the club. **I think that they should have a list and make available on request. This said, if it didn't exist I am sure that any investigation that was criminally focused could/might have grounds (based on circumstances – every event being different) to get a search warrant for club info; very low likelihood needed, I suspect.**
- What would be the concerns if this requirement was removed? **I think this would be safe to remove. Agree**

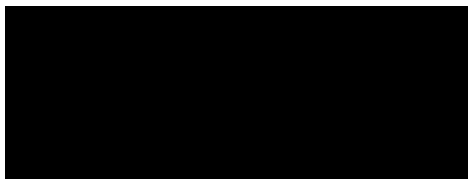
Notification of declined membership – Reg 28GE(2)(b)

- What's the benefit of this for Police? I think that this is likely to be constitution / incorporated society linked and more about managing left over firearms and ammo disposal if closing properly. As all firearms will be in the registry by 2028 then I don't see a need for this. Reg 28GE(2)(b) refers specifically to pistol clubs and enables FSA to track a 'B' endorsement holders condition requiring them to be a member 'of an incorporated pistol shooting club that holds a certificate of approval', Arms Act 29(2)(a) . A scenario could be that an 'B' endorsement holder may have resigned from a club and then had his membership application declined at another club leaving them no longer a member of any club then not meeting a condition of his endorsement.
- What might the consequence (for the club) be of not providing this information? ie lost approval? Safe to remove. Consideration to leave. Agree

I recall it was mentioned that one way the burden could be lifted would be to remove the reporting requirement on clubs – annual reporting requirement under section 38K and 28GO – and instead to say that annual reports should be made available if requested. I've reflected that perhaps this does not really lessen the regulatory burden on clubs – if they still have to maintain the information, it would only be the last step of providing that to Police that would be removed. Any thoughts on this? I think the outcome we want from clubs is to 1. Have visibility that they exist, 2. If they are connected to a range, and 3. That they report issues, risks, individuals of concern to us for consideration of what (any) action we might want to take. Agree

It would be really helpful to have your thoughts down, as I continue to work through the analysis. Happy to answer any questions, if that's helpful.

Ngā mihi
Fiona



Fiona Alexander
Principal Advisor – Harm Reduction and Public Safety
Policy Group
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www.justice.govt.nz

From: MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Sent: Tuesday, 27 February 2024 10:16 am
To: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Cc: s.9(2)(g)(ii) >
Subject: Response: [EXTERNAL] Following up on clubs/ranges

Hey Fiona

I see s.9(2)(g)(ii) has responded on numbers. I have provided a couple of points below but will share your questions with Mike T and Pete so that they are prepared for tomorrow 😊

Kind regards,

Mike

Mike McIlraith
Kaihautū Kōtui | Director Partnerships
Te Tari Pūreke | Firearms Safety Authority
E michael.mcilraith@police.govt.nz



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From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Sent: Tuesday, 27 February 2024 9:29 am
To: MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Cc: **S.9(2)(g)(ii)**
Subject: RE: Response: [EXTERNAL] Following up on clubs/ranges

Kia ora Mike,

As a follow up, tomorrow, I'd also like to discuss and understand the updated position in respect of clubs/ranges that have applied to be approved/certified. I thought it might be helpful to set out some questions ahead of tomorrow.

The January Part 6 briefing had the following information:

300 other (non-pistol) shooting clubs,
 278 applications have been approved
 22 clubs yet to be approved, but continue to operate (Police awaiting documentation or payment)

1285 ranges in operation
 476 are fully certified
 809 range applications are being processed

Are these figures still accurate?

I understand that for clubs/ranges operating before the changes came into effect, so long as they have made an application, they continue to operate. **Correct.** Will this transitional situation exist indefinitely (until all steps are taken to approve or a decision is made not to approve the applications)? **An end point would come. But before we got there the C&R team would work with the club to resolve issues to encourage the club to be successful with their application. However, if despite all reasonable efforts the club didn't come up to requirements then an outcome would likely be refusal.**

If a club has applied for approval but is waiting receiving their approval, do they have to comply with the ongoing requirements as if they were approved? **From memory yes, but Mike T and Pete will be able to confirm.**

I'm keen to chat about what steps, if any, are being taken to support clubs/ranges through the process of being approved/certified. **The C&R team have done a lot here. This work really started in 2020 when Pete established a working group around ranges. After the range aspect was well advanced attention was then able to be given to the club requirement. Part of our challenge with clubs was waiting for the regulations to be agreed. But Mike T and Pete will be well placed to answer in detail.**

Ngā mihi

Fiona

Fiona Alexander
Principal Advisor – Harm Reduction and Public Safety
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From: Alexander, Fiona
Sent: Thursday, 22 February 2024 1:00 pm
To: 'MCILRAITH, Michael (Mike)' <Michael.McIlraith@police.govt.nz>
Cc: s.9(2)(g)(ii) >
Subject: RE: Response: [EXTERNAL] Following up on clubs/ranges

Kia ora Mike,

Thanks for arranging a meeting time. I'm copying s.9(2)(b) in in case she can come along too.

Suggested agenda for discussion:

1. Discuss evidence around effectiveness of the current requirements on non-pistol clubs (as per first email).
 - In addition to the below questions, I wondered if there was any info about how many clubs needed to improve their security so that they could be approved?
2. Discuss options for reducing the regulatory burden: if an option is to retain the status quo of regulation of clubs, but to reduce the admin burden on the people running clubs, what are the options for doing this and what would be pros/cons be of these options?
 - Consider for both pistol and non-pistol
 - Consider for both initial obligations (getting approval) but also ongoing requirements.
3. Are there any duplicative requirements that could be gotten rid of?
 - Consider for both pistol and non-pistol
 - I know reg 28GP reduces some duplication, but I wonder if there are others which have come to light since the Regs were made.

At this stage, it's a case of coming up with options. There will naturally be some which have lots of disadvantages and vice versa and I'd like this to be the opportunity to discuss those.

Ngā mihi
Fiona

Fiona Alexander
Principal Advisor – Harm Reduction and Public Safety
Policy Group
Ministry of Justice | Tāhū o te Ture
Tel: s.9(2)(a) OIA

From: MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Sent: Thursday, 22 February 2024 11:53 am
To: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Subject: RE: Response: [EXTERNAL] Following up on clubs/ranges

Hi Fiona

As you will have seen Char from my team will sort out a meeting for us. Really good to meet and discuss this and thanks for that opportunity. Could you craft a few bullet points (or lift and shift points already noted below) so that Mike T and I have a clear view of discussion points please.

Kind regards,

Mike

Mike McIlraith
Kaihautū Kōtui | Director Partnerships
Te Tari Pūreke | Firearms Safety Authority
E michael.mcilraith@police.govt.nz



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From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Sent: Thursday, 22 February 2024 10:59 am
To: MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Subject: RE: Response: [EXTERNAL] Following up on clubs/ranges

Kia ora Mike,

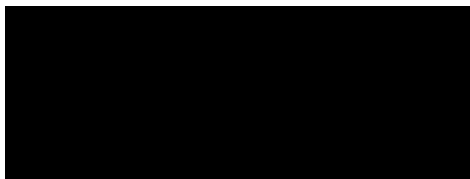
Thanks for providing initial responses to my queries. It's really helpful.

A teams call next week would be great. As well as discuss the questions I set down here, I'd also like to explore what options there are for lifting the regulatory burden on clubs. In terms of analysing options, I'm considering what could be put forward as "status quo light" eg regulation, but with fewer requirements than there currently is on clubs.

You might already know of requirements that could be removed and the pros/cons of that.

In terms of my availability, Monday afternoon after about 1pm would be ok, Tuesday is free all day. Let me know if there's a good time somewhere then. Happy to meet in person or online – I'm sorry, I cannot remember where you are all based!

Ngā mihi
Fiona



Fiona Alexander
Principal Advisor – Harm Reduction and Public Safety
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From: MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Sent: Thursday, 22 February 2024 10:45 am
To: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Subject: Response: [EXTERNAL] Following up on clubs/ranges

Hey Fiona

Always great to meet in person. I feel for you and the team as with an existing workload you now have so much more to do. Funnily (not), Police went through that pain of trying to fit firearms in around other things and that didn't work, hence they established a dedicated firearms policy team. Anyway, hope you're all able to keep your heads above water 😊

Thanks for sending through the questions below

Kind regards,

Mike

Mike McIlraith
Kaihautū Kōtui | Director Partnerships
Te Tari Pūreke | Firearms Safety Authority
E michael.mcilraith@police.govt.nz



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From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Sent: Wednesday, 21 February 2024 4:44 pm
To: MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>
Subject: [EXTERNAL] Following up on clubs/ranges

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Kia ora Mike,

I hope you're well. It was good to meet you in person at TTP.

I'm reaching out to ask if you could put me in contact with someone. I'm progressing analysis of the Part 6 side of things and I'm looking for information to help fill some gaps in my knowledge.

I remember that a couple of the clubs/ranges people were on holidays – but I cannot remember when! – so I thought I'd reach out and ask if you could let me know who to contact. **Mike T is back on deck next week. Can I set up a Teams call for us to connect?**

I'll likely have questions as I go, but the first one few I wanted to ask were these:

1. I'm trying to explore how effective the changes on clubs have been. This is separate to the changes relating to ranges (although I know there are connections – so it may not be easy to separate!) **Noted and good to separate as you are correct, they are very different things.** This may be difficult to assess given that the regulations are fairly new. But I wonder:
 - Is there any data yet on the way the regulations on clubs are working? For example, has there been any information provided yet about safety incidents that Police wouldn't have had but for the changes? Or about storage requirements? **Nothing that I am aware of but we'll get C&R to answer.**
 - Is there any other info that you think would be useful for me to know to understand the benefits of regulating clubs (again, separate to ranges – for which I know there is the info about how many have been issued with improvement notices to bring them up to standard). **My view is that we are now up and going and the community has moulded to the new world. I do think that in the long term the current regulatory settings might help with safety interventions is probable. I think this because we are playing a long game to really see benefits, much like with the Australians really seeing benefits 20 years after the 1996 Port Arthur event. With the complication of club guns and ammo being provided and the exemption to requiring a dealer licence unpicking this would be a painfully long journey.**
2. Would it be fair to say that because there was no regulation of non-pistol clubs before the changes, the amount of information known about them before was limited? **Correct. Some basic understanding through FCAF members and some visits, but nothing documented or substantial that would be useful in any way.**
3. Do you know how many non-pistol clubs were incorporated before there was the requirement for them to be incorporated (if they sell firearms/ammunition)? **Don't know. I suspect not many as not sure what the benefit could have been to them as many had and provided firearms and ammunition with no legislative requirements pre-changes. We could ask FCAF if that was helpful? If we did that we would just need the wording of the request and my team will put out and provide responses in a bundle for you.**
4. This may not be possible, but, is there any way of estimating how many *new* clubs we might expect in the future? **This would be too difficult to determine. We promote club membership but I would also note that they are mostly in our urban areas. Small bore clubs struggle for membership, where clay shooting probably do okay and there is a mixed bag for the rest. Clubs (likely more about the range that the club owns or has access to) would, in my assessment or urban licence holders, be about having somewhere to go to zero a rifle before a hunt and not about competitions; competition attendees are a lesser number. Of course, the main burden to become an approved club is at the beginning, and the ongoing obligations are lower. Agree. So much of the 'pain' for existing has finished. Given that, as far as you are aware, clubs have complied and have made applications to be approved, I'm wondering how many more might have to go through the initial approval process (I know that some might amalgamate, which could result in a new application). We will ask C&R team. As I say, it may just be impossible to tell, but if you have any way of estimating, that could be helpful.**
5. Also, do you have any particular contact at Companies House re incorporated societies? **No. But I know COLFO have written to them and had a response. I have asked my COLFO contact for details on who they**

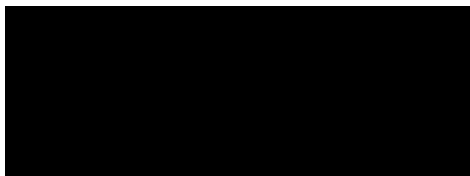
have been dealing with. Will let you know once I hear back. I'd like to understand exactly what personal information is published online and whether any exception could be created.

As I say, I'm likely to have some more questions along the way, but these are the ones I've been grappling with right now!

Happy to chat if that's easiest – I'm on s.9(2)(a) OIA, or we can arrange a Teams call.

Ngā mihi

Fiona



Fiona Alexander

Principal Advisor – Harm Reduction and Public Safety

Policy Group

Ministry of Justice | Tāhū o te Ture

Tel: s.9(2)(a) OIA

Ext: s.9(2)(a) OIA

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RELEASED UNDER THE OFFICIAL INFORMATION ACT

From: s.9(2)(g)(ii)
To: PETREY, Catherine
Subject: FW: [EXTERNAL] RE: Part 6 clubs and ranges work
Date: Tuesday, 19 December 2023 1:34:00 pm
Attachments: image001.png
image002.png

FYI []

From: s.9(2)(g)(ii)
Sent: Friday, 15 December 2023 1:59 PM
To: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Cc: sally.wheeler@justice.govt.nz; WHITE, John <John.White@police.govt.nz>; WILSON, Richard (RJ) <Richard.Wilson@Police.Govt.NZ>
Subject: RE: [EXTERNAL] RE: Part 6 clubs and ranges work

Hi Fiona,

Thank you for your time on the phone this morning and for providing that summary below. It is really useful for us to understand more about where the Minister is coming from.

John has had an indication from our PAG advisor that we should be aiming for 15 January for the report back to the Minister. If you get any agreement from the Associate Minister's Office about the due date could you please keep John in the loop on that?

As requested here is the link to the previous LOA with Pistol NZ: [pistol-association-nz-letter-of-agreement.pdf \(police.govt.nz\)](#) – the updated LOA is still in draft stage so its most useful to refer to the previous version at this time, which also has a lot of the detail that is now in legislation.

As discussed this morning – I'll circulate some more material relating to the discussions so far on clubs and ranges later today.

I also wanted to reiterate our offer to arrange visits to a range and the armoury for you and your colleagues. It is getting a bit tight for that this side of Christmas, but if there are dates in the new year that would work best for you please let me or John know, and I will make arrangements.

We also discussed cost recovery this morning – here is a bit of background you may find useful from our Firearms second tier BIM for the Minister of Police. We have also prepared a draft briefing and CRIS, if you get a timeframe for this work and want to meet to discuss it further please let us know.

Decisions about cost recovery/fees setting were deferred and now sit with you

1. The Arms Act sets out the requirements for settings fees for arms regulatory services that offset the Crown funding for the operation of FSA. These fees have not been reviewed since 1999, when the fee for a firearms licence was set at 50 percent of the recoverable cost of processing a firearms licence.
2. The estimated full recoverable cost of a 10-year firearms licence is \$970 as estimated in 2022. The fee for a 10-year firearms licence is currently \$126.50 which is 13 percent of the estimated recoverable cost of a firearms licence. If fees remain unchanged, users of arms regulatory services (this includes licence holders, endorsement holders and importers) are expected to contribute 5 percent of estimated recoverable costs over the 11-year period FY22/23 to FY32/33.
3. In November 2022, Cabinet approved the release of a public discussion document on a review of fees seeking feedback on the possibility of fees being set at 25%, 50% or 75% of full recoverable cost for a firearms licence. Fees for activities where there is

only a private benefit were proposed to be full cost recovery. Police consulted on firearm fee proposals from 8 December 2022 to 2 March 2023, with 6,004 submissions received during the consultation period.

4. Consultation feedback indicated that the firearms community accepted that an increase in fees was justified. However, submitters were concerned that very high fee increases may result in non-compliance with the regulatory regime. Finding the right balance between the cost recovered and maintaining a level of safety is important in the approach to the setting of fees. If fees for a firearms licence are considered by firearms users to be unacceptable or unaffordable, there is a risk of non-compliance with people choosing to opt out of the regulatory system and potentially retain and use firearms unlawfully and not register their firearms.
5. We welcome the opportunity to discuss whether and how you would like to progress the cost recovery work and timelines for this work. We can provide you with a cost recovery impact statement that assesses all options and recommended that fees be set at 33% of the full cost of a firearms licence (the weighted average of submitters feedback) and full cost recovery for dealer's licences, import permits and endorsements where it is a private benefit.

Ngā mihi,

s.9(2)(g)(ii)

s.9(2)(g)(ii)

Senior Advisor Firearms Policy
Policy & Partnerships
NZ Police National Headquarters

E s.9(2)(g)(ii)

My normal hours of work are 8am-4pm Monday, Tuesday, Wednesday and Friday.



From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>

Sent: Friday, 15 December 2023 9:01 AM

To: s.9(2)(g)(ii)

Cc: Wheeler, Sally <Sally.Wheeler@justice.govt.nz>

Subject: FW: [EXTERNAL] RE: Part 6 clubs and ranges work

Hi s.9(2)(g)(ii)

Thanks for calling.

Below are my rough notes from the meeting, roughly in a briefing outline.

As discussed, it would be great if you could send through the most recent MOU/LOA to have a look at that. You'll see it's relevant to consideration of governing body approval.

Also, we discussed Police providing data/information which might be useful to support the problem

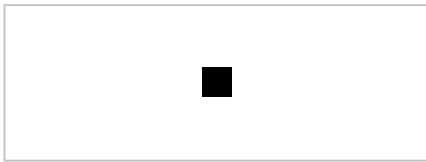
definition (or perhaps provide a different take on it?): how many clubs, how many have signed up to the regime, how many have folded, what was the evidence of how they operated before the changes came in. You mentioned some case studies, which could inform an appendix to the briefing.

Ngā mihi
Fiona

s.9(2)(f)(iv) OIA

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s.9(2)(f)(iv) OIA



Fiona Alexander

Principal Advisor – Harm Reduction and Public Safety
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From: Alexander, Fiona

Sent: Thursday, 14 December 2023 3:47 pm

To: s.9(2)(g)(ii)

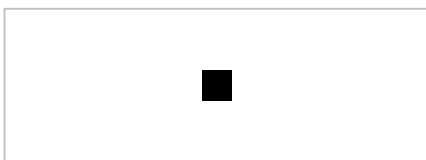
Subject: RE: [EXTERNAL] RE: Part 6 clubs and ranges work

Kia ora s.9(2)(g)(ii)

I was hoping to have a quick chat with you. Are you around this afternoon or some point tomorrow morning?

I'm on s.9(2)(a) OIA. If it's tomorrow, just call me directly rather than emailing, as I won't have access to my emails.

Ngā mihi
Fiona



Fiona Alexander

Principal Advisor – Harm Reduction and Public Safety
Policy Group
Ministry of Justice | Tāhū o te Ture

s.9(2)(a) OIA

Ext: s.9(2)(a) OIA

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From: s.9(2)(g)(ii)

Sent: Wednesday, 13 December 2023 3:32 pm

To: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>

Cc: Ryland, Scott <Scott.Ryland@justice.govt.nz>; Takurua, Patrick <Patrick.Takurua@justice.govt.nz>; WHITE, John <John.White@police.govt.nz>

Subject: RE: [EXTERNAL] RE: Part 6 clubs and ranges work

Hi Fiona,

It probably is the same Bill, it is consistent with the consultation document put out pre-election too ([230824_ACT_Policy_Document_\(Fair_Firearms\).pdf \(nationbuilder.com\)](#))

Thank you all for attending the discussion today. We really appreciate you making the time during this busy period and I know it did go over time a wee bit...

I will circulate by Friday a summary of the risks and gaps identified in the discussions so far.

I wanted to also let you know that I am on leave from this Friday afternoon to 9 January. Before I go on leave I was planning to circulate the paper I've started drafting for internal feedback, to ensure I haven't missed anything key from the discussions so far.

Noting of course that it is still a very working draft and really just aiming to get the police perspective down on paper. There is obviously a lot more work to do to develop the options and next steps, and we won't know whether it will be a joint briefing or a Justice briefing until the new year.

Would you like for me to send you a copy of the draft at the same time? Some of the background may be useful for you and of course we welcome feedback on it, but I don't want to overload you with reading!

I was also thinking about setting up a workshop in January (either week of the 8th or 15th) with our clubs and ranges people and legal, to give us a bit more time and hopefully be able to meet face to face. If that is something you would be interested in attending can you please let me know whether there are days or times that would suit you better?

Ngā mihi,

s.9(2)(a) ORP

s.9(2)(g)(ii) (she/her)

Senior Advisor Firearms Policy

Policy & Partnerships

NZ Police National Headquarters

E s.9(2)(g)(ii)



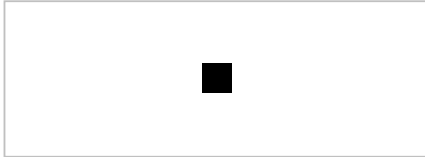
From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>

Sent: Wednesday, 13 December 2023 3:20 PM

To: s.9(2)(g)(ii)
Cc: Ryland, Scott <Scott.Ryland@justice.govt.nz>; Takurua, Patrick <Patrick.Takurua@justice.govt.nz>
Subject: [EXTERNAL] RE: Part 6 clubs and ranges work

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[arms-repeal-for-practical-use-amendment-bill.pdf \(www.parliament.nz\)](#)



Fiona Alexander
Principal Advisor – Harm Reduction and Public Safety
Policy Group
Ministry of Justice | Tāhū o te Ture
s.9(2)(a) OIA
Ext: s.9(2)(a) OIA
www.justice.govt.nz

From: Alexander, Fiona
Sent: Wednesday, 13 December 2023 3:19 pm
To: s.9(2)(g)(ii)
Cc: Ryland, Scott <Scott.Ryland@justice.govt.nz>; Takurua, Patrick <Patrick.Takurua@justice.govt.nz>
Subject: RE: Part 6 clubs and ranges work

Kia ora s.9(2)(g)(ii)

I found this, which may be the Associate Minister's Bill we were speaking about yesterday.

Ngā mihi
Fiona



Fiona Alexander
Principal Advisor – Harm Reduction and Public Safety
Policy Group
Ministry of Justice | Tāhū o te Ture
s.9(2)(a) OIA
Ext: s.9(2)(a) OIA
www.justice.govt.nz

-----Original Appointment-----

From: s.9(2)(g)(ii)
Sent: Wednesday, 13 December 2023 9:26 am
To: WILSON, Richard (RJ); s.9(2)(g)(ii) OIA; catherinepetrey; BAIRD, Peter; TARTTELIN, Michael; Wheeler, Sally; Ryland, Scott; Alexander, Fiona
Cc: WHITE, John; CRAWFORD, Steven (Steve); MCILRAITH, Michael (Mike); s.9(2)(g)(ii)
Subject: Part 6 clubs and ranges work
When: Wednesday, 13 December 2023 12:30 pm-1:30 pm (UTC+12:00) Auckland, Wellington.
Where: PNHQ-L5 Rm 5.11 (Smartboard) + Teams

Kia ora koutou,

Hope everyone is enjoying the nicer weather this morning!

I've amended and attached the agenda from the last meeting for our discussion today. I'm hoping we can focus more on the gaps and risks if the provisions for clubs and ranges were repealed.

Looking forward to catching up later.

Ngā mihi,



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s.9(2)(g)(ii)

From: s.9(2)(g)(ii)
Sent: Friday, 16 February 2024 11:58 am
To: BAIRD, Peter; CRAWFORD, Steven (Steve); MACGREGOR, Julie
Cc: PETREY, Catherine; WILSON, Richard (RJ); s.9(2)(g)(ii) TARTTELIN, Michael
Subject: RE: Further club data FW: Question RE: Information for Review of Part 6

Thank you – we appreciate the quick response.

Ngā mihi,

s.9(2)(g)(ii)

s.9(2)(g)(ii)
Senior Advisor Firearms Policy
Policy & Partnerships
NZ Police National Headquarters

E s.9(2)(g)(ii)

My normal hours of work are 8am-4pm Monday, Tuesday, Wednesday and Friday.



From: BAIRD, Peter <Peter.Baird@police.govt.nz>
Sent: Friday, 16 February 2024 11:53 AM
To: s.9(2)(g)(ii) CRAWFORD, Steven (Steve) <Steven.Crawford@police.govt.nz>;
s.9(2)(g)(ii)
Cc: PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>; WILSON, Richard (RJ)
<Richard.Wilson@Police.Govt.NZ>; s.9(2)(g)(ii) TARTTELIN, Michael
<Michael.Tarttelin@police.govt.nz>
Subject: RE: Further club data FW: Question RE: Information for Review of Part 6

Good morning all.

Response below

- Of the 300 Club applications received - 167 of these declared that they sell ammunition, and of these (167 clubs), 41 also declared that they also sell firearms.
The context for this is selling does not mean "supply" i.e. a smallbore club providing firearms on a shoot night. This relates to actual selling. Club applicants commented on the application form that the sale would only be for firearms surplus to requirement and should be interrupted as having the capacity / capability to sell, not in the context of a shop frontage.
- Pistol club data regarding who is selling ammunition is not *currently* available.
Correct we don't have the pistol club returns at this time.
- How many of the clubs that indicated they sell ammunition have not provided evidence they are an incorporated society / their incorporated society ID number?

There are 11 clubs that have not been incorporated to date and been advised that they can no longer sell ammunition (notified by C&R July23) . There may be clubs that have within their cohort a dealer or an ammunition seller, operating / selling under another incorporation. However, in law, those 11 could not be selling / supplying. **s.6(c) OIA** This would be picked up as part of a C&R District club visits or a club annual return. This process is in its infancy. If they are selling, C&R will receive their sales records.

Ngā mihi nui

PGR

Inspector Peter (PGR) Baird
Manager, Compliance Services
M **s.9(2)(a) OIA**
E Peter.Baird@police.govt.nz



Te Tari Pūreke
Firearms Safety Authority

<https://www.firearmssafetyauthority.govt.nz>

[]

From: **s.9(2)(g)(ii)**
Sent: Friday, 16 February 2024 11:22 am
To: BAIRD, Peter <Peter.Baird@police.govt.nz>; CRAWFORD, Steven (Steve) <Steven.Crawford@police.govt.nz>
Cc: PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>; WILSON, Richard (RJ) <Richard.Wilson@Police.Govt.NZ>; **s.9(2)(g)(ii)**
Subject: RE: Further club data FW: Question RE: Information for Review of Part 6

Kia ora,

Further to the below regarding clubs selling ammunition:

- Of the 300 Club applications received - **167** of these declared that they sell ammunition, and of these (167 clubs), 41 also declared that they also sell firearms.
- Pistol club data regarding who is selling ammunition is not *currently* available.

How many of the clubs that indicated they sell ammunition have not provided evidence they are an incorporated society / their incorporated society ID number? **s.9(2)(g)(ii)**

s.9(2)(g)(ii) it is already to hand.

Happy to discuss if that is easier.

Thank you

Ngā mihi,

s.9(2)(g)(ii)

s.9(2)(g)(ii)
Senior Advisor Firearms Policy
Policy & Partnerships
NZ Police National Headquarters



From: TARTTELIN, Michael

Sent: Thursday, 14 December 2023 2:28 PM

To: PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>

Cc: WILSON, Richard (RJ) <Richard.Wilson@Police.Govt.NZ>; BAIRD, Peter <Peter.Baird@police.govt.nz>;

CRAWFORD, Steven (Steve) <Steven.Crawford@police.govt.nz>

Subject: Further club data FW: Question RE: Information for Review of Part 6

Catherine,

In response to your inquiry;

- Of the 300 non-pistol club applications received, 95 did not indicate that they operate a range.
- Of the 300 Club applications received - 167 of these declared that they sell ammunition, and of these (167 clubs), 41 also declared that they also sell firearms.
- The original club application form, which was extensively reviewed and approved by policy, only required a declaration as to whether clubs were 'selling' - it didn't address the other aspects of 'supplying, lending or providing' of firearms or ammunition. As soon as this was realised, the form was modified, however the majority of applications had been received by then. Back capturing of this information is now being addressed through the subsequent visits/inspections. As such, these numbers do not accurately reflect the reality.
- Most of the Smallbore clubs (111 applications) and Clay target clubs (75 applications) hold business house competitions, host public open days or host community groups (scouts, school groups, etc) where they provide attendees with the use of a target rifle/shotgun and ammunition to participate under supervision (attendees may or may not hold a firearms license).
- NZ DeerStalkers Assn, conduct a training courses called "HUNT's", where people are taught aspects of hunting). Those participants may not have a firearms license or a firearms. Normally, they would be provided with 'club' firearms and ammunition to participate.
- There are 65 commercial range operators that are not clubs, and for the majority, they provide firearms and ammunition ie, the wedding venue/function centres', corporate teambuilding businesses, country retreat/experience venues. They are therefore required to have someone holding a dealers license's. Prior to the legislation the majority did not hold this licence and in a vast majority of case's this didn't occur.
- Pistol club data regarding who is selling ammunition is not **currently** available.

Senior Sergeant Mike Tarttelin

Manager Clubs and Ranges

☎ wk cell: s.9(2)(a) OIA

✉ Email: michael.tarttelin@police.govt.nz



[]

From: PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>

Sent: Friday, 8 December 2023 1:59 PM

To: TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>

Subject: FW: Question RE: Information for Review of Part 6

Mike of the 300 non pistol clubs do we know how many of these do not operate a range. We know that 3 pistol clubs don't but what about the others. I know several deer stalker clubs don't. What else?

Also do we know the number of pistol clubs and separately non-pistol clubs that declared they supplied firearms and ammo.

This will be useful data.

CP

From: PETREY, Catherine

Sent: Friday, 8 December 2023 1:56 PM

To: TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>

Subject: Question RE: Information for Review of Part 6

Mike of the 300 non pistol clubs do we know how many of these do not operate a range. We know that 3 pistol clubs don't but what about the others. I know several deer stalker clubs don't. What else?

s.9(2)(f)(iv) OIA

RELEASED UNDER THE OFFICIAL INFORMATION ACT

s9(2)(f)(iv) OIA

RELEASED UNDER THE OFFICIAL INFORMATION ACT

s9(2)(g)(ii)

From: s9(2)(g)(ii)
Sent: Wednesday, 10 January 2024 11:24 am
To: Wheeler, Sally
Cc: McIlwrath, Corinne; WHITE, John; MANSELL, Angela; SEARANCKE, Laura
Subject: RE: [EXTERNAL] RE: Thanks and rough list of legislative change
Attachments: Leg issues log - Part 6 items.docx

Hi Sally,

Here's that extract of our issues log relating to Part 6 etc. Most of the content that relates to clubs and ranges looks to be just minor wording issues, so I imagine would be picked up in any rewrite anyway.

Cheers

s9(2)(g)(ii)
Senior Policy Advisor – Firearms Policy
Policy and Partnerships
E s9(2)(g)(ii)



From: Wheeler, Sally <Sally.Wheeler@justice.govt.nz>
Sent: Wednesday, 10 January 2024 9:25 AM
To: MANSELL, Angela <Angela.Mansell@police.govt.nz>; SEARANCKE, Laura <Laura.Searancke@police.govt.nz>
Cc: s.9(2)(a) OIA; WHITE, John <John.White@police.govt.nz>; s9(2)(g)(ii)
Subject: [EXTERNAL] RE: Thanks and rough list of legislative change

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Good morning

I've been reflecting on our chat about the work on clubs and ranges and our approach of:

- an initial briefing on 19 Jan setting out a proposed approach to developing the legislation (including an approach to consultation) and some initial policy advice on changes, then
- a further briefing in late Feb with more detailed advice on changes and seeking agreement to draft an Cab paper.

You mentioned your work to date has identified a range of potential changes across the broader regulatory regime and we discussed where these might feed these into phases of reform.

In the first instance it would be very helpful to know if/what you have identified specifically in Part 6 of the Act and Parts 5 and 6 of the Regulations. As I mentioned, we may be able to pick these up through this reform – assuming they align with the Minister's objectives – signalling them in the first briefing, then including them in the second. If you have it to hand, I wonder if you could please send me a high-level list of provisions in Part 6 of the Act and Parts 5 and 6 of the Regulations that you've identified for change.

I'm reviewing the briefing this morning and will be looking out for how we might do this.

Thanks

Sally



Sally Wheeler

Policy Manager | Criminal Justice Unit | Policy Group

Ministry of Justice | Tāhū o te Ture

s.9(2)(a) OIA

Justice Centre | 19 Aitken Street | Wellington 6011

From: Wheeler, Sally

Sent: Tuesday, 9 January 2024 4:07 pm

To: 'Angela.Mansell@police.govt.nz' <Angela.Mansell@police.govt.nz>; **s.9(2)(g)(ii)**
'Laura.Searancke@police.govt.nz' <Laura.Searancke@police.govt.nz>;
'John.White@police.govt.nz' <John.White@police.govt.nz>

Cc: Keys, Fleur <Fleur.Keys@justice.govt.nz>

Subject: Thanks and rough list of legislative change

Kia ora

Thanks very much for your time today chatting across the transition landscape – there are certainly a lot of moving parts.

As promised, here's the rough list of areas for law change that may fall out of upcoming policy advice to the Associate Minister. I shared this with her office to encourage them to start thinking about how they might package up and time their legislative processes.

- **Potential Amendments – in the immediate term (2024)**
 - FPO amendment Bill alongside the Gangs Omnibus Bill (assuming the Cabinet Office requires two Bills)
 - Legislative change within the first 100 days
 - Clubs and ranges amendments to Part 6 of the Act and Parts 5 and 6 of the Regulations
 - Advice in Jan and Feb, legislative change potentially first half of 2024
 - **s.9(2)(f)(iv) OIA**
 - Potentially alongside Part 6 amendment
 - Potential amendments required to move the FSA
 - Advice in March, legislative change potentially following
 - Potential amendments following the review of the Firearms Registry
 - Review to commence in June
 - Any amendments could be in a 2024 amendment Bill or folded into the Reform Bill
 - May also include Reg changes
 - Amendment to the current statutory review requirement for a review of the Act to begin in 2026
 - Needs to happen before 2026
 - Rats and mice following the assignment of the portfolio to Justice, eg changes to references to the Minister of Police, Commissioner, etc
 - Cabinet Office has advised this can happen at any time
 - May also include Reg changes
- **Potential Reform Bill – passed by the end of the parliamentary term**
 - General modernisation and update of all drafting and settings
 - Changes to the licencing system, including licence types – as described by the Associate Minister
 - etc

Chat soon

Sally



Sally Wheeler

Policy Manager | Criminal Justice Unit | Policy Group

Ministry of Justice | Tāhū o te Ture

s.9(2)(a) OIA

Justice Centre | 19 Aitken Street | Wellington 6011

RELEASED UNDER THE OFFICIAL INFORMATION ACT

From: [PETREY, Catherine](#)
To: [WOOD, Jeremy](#)
Subject: RE: Some pints on immediate repeal of Part 6
Date: Saturday, 25 November 2023 5:21:00 PM

Part 6 codified the LOA with PNZ. **s.9(2)(f)(iv) OIA**

[REDACTED]

From: WOOD, Jeremy <Jeremy.Wood@police.govt.nz>
Sent: Friday, 24 November 2023 3:39 PM
To: PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>
Cc: **s.9(2)(g)(ii)** **s.9(2)(g)(ii)**
s.9(2)(g)(ii) WHITE, John <John.White@police.govt.nz>
Subject: RE: Some pints on immediate repeal of Part 6

Thanks [REDACTED] feels like I could do with a some pints right now!

I noted the Act agreement said: repeal and replace Part 6 of the Arms Act 1983 relating to clubs and ranges.

So it allows for leaving those sections that done relate to clubs and ranges, so pistols are ok. I done know what they mean by replace... but it could mean with the pistol section?

Cheers,

Jeremy

From: PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>
Sent: Friday, 24 November 2023 3:33 PM
To: WOOD, Jeremy <Jeremy.Wood@police.govt.nz>
Cc: **s9(2)(g)(ii)**
[REDACTED] WHITE, John <John.White@police.govt.nz>
Subject: Some pints on immediate repeal of Part 6

Immediately begin to repeal and replace Part 6 of the Arms Act 1983 relating to clubs and ranges.

Risks from immediate repeal of Part 6 – Removes oversight of pistol clubs and pistol ranges. Section 29 (2)(a) enables a person to obtain an endorsement to shoot all pistols (including semi-automatic pistols) on the condition they are a member of an incorporated pistol club and regulation 22 limits shooting to a pistol range.

If Part 6 is removed an alternative mechanism will be required to implement section 29 (2)(a) either a binding and enforceable letter of agreement with all pistol clubs or new section specific to pistol clubs.

Recall that pistol clubs were exempted from the prohibited firearms regime because there was some regulatory oversight ie allowed to keep large capacity magazines, use semi-automatic pistols, use pistol carbine conversions kits which turns semi-automatic pistols into semi-

automatic rifles.

Most clubs including pistol clubs have been supplying firearms and ammunition. Part 6 introduced a regime of regulatory oversight of this supply and sale. If part 6 is repealed immediately and they wish to continue to supply/sell they will either have to become dealers or ammunition sellers. If no oversight retained they will become an obvious source of supply to non-firearms licence holders including potential extremist and criminals.

Catherine Petrey

Policy Group | New Zealand Police

PR-2020-004

catherine.petrey@police.govt.nz

Police National Headquarters, 180 Molesworth St, Thorndon, PO Box 3017, Wellington 6140

RELEASED UNDER THE OFFICIAL INFORMATION ACT

From: s9(2)(g)(ii)
To: Alexander, Fiona
Subject: RE: [EXTERNAL] RE: Part 6 clubs and ranges work
Date: Friday, 15 December 2023 5:16:00 pm
Attachments: image001.png
image002.png

Hi Fiona

Apologies I've just picked up this email and in answer to your review question below:

Section 96 of the Arms Act states that "the Minister of Police must review the operation of this Act when all of the provisions of the amendment Act (except [sections 106](#) and [108](#)) have been in force for 3 years" – which is June 2026). The review must include:

- The operation of the Registry;
- All offences and penalties in the Act; and
- The impact of the Arms Legislation Act 2020.

The Act requires the Minister to complete the review by December 2027 and report on the outcome of this review, including any recommendations for amendments to the Act, to Parliament as soon as practicable after it has been completed.

Ngā mihi,

s9(2)(g)(ii)

From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Sent: Wednesday, 13 December 2023 8:04 PM
To: s9(2)(g)(ii)
Cc: Ryland, Scott <Scott.Ryland@justice.govt.nz>; Takurua, Patrick <Patrick.Takurua@justice.govt.nz>; WHITE, John <John.White@police.govt.nz>
Subject: RE: [EXTERNAL] RE: Part 6 clubs and ranges work

Kia ora s9(2)(g)(ii)

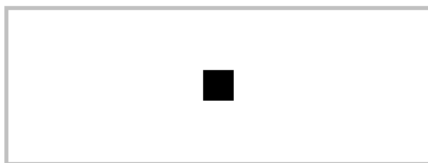
Thanks for your reply, and thanks again for inviting us to the meeting today. It's really helpful to be involved in the discussions to get a sense of the issues, risks etc.

Yes, please copy us into the draft, wherever you get with it.

We've not yet got confirmation of the due date to the Minister's office, but will hopefully have clarity on that tomorrow. I'll let you know if we do. That might influence the timing of a workshop. I'll come back to you on dates.

A question I had that you might know of hand; in terms of the review of the Act, I understand that the leg stipulates that the review must start 3 years after the amendments have been in force, and completed within 18 months (other than a couple of amendments that don't need to have come in force). According to this calculation, when does the review need to start?

Ngā mihi
Fiona



Policy Group
Ministry of Justice | Tāhū o te Ture
Tel: s.9(2)(a) OIA
Ext: 50853
www.justice.govt.nz

From: s9(2)(g)(ii)
Sent: Wednesday, 13 December 2023 3:32 pm
To: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>
Cc: Ryland, Scott <Scott.Ryland@justice.govt.nz>; Takurua, Patrick <Patrick.Takurua@justice.govt.nz>;
WHITE, John <John.White@police.govt.nz>
Subject: RE: [EXTERNAL] RE: Part 6 clubs and ranges work

Hi Fiona,

It probably is the same Bill, it is consistent with the consultation document put out pre-election too
([230824_ACT_Policy_Document_\(Fair_Firearms\).pdf \(nationbuilder.com\)](#))

Thank you all for attending the discussion today. We really appreciate you making the time during this busy period and I know it did go over time a wee bit...

I will circulate by Friday a summary of the risks and gaps identified in the discussions so far.

I wanted to also let you know that I am on leave from this Friday afternoon to 9 January. Before I go on leave I was planning to circulate the paper I've started drafting for internal feedback, to ensure I haven't missed anything key from the discussions so far.

Noting of course that it is still a very working draft and really just aiming to get the police perspective down on paper. There is obviously a lot more work to do to develop the options and next steps, and we won't know whether it will be a joint briefing or a Justice briefing until the new year.

Would you like for me to send you a copy of the draft at the same time? Some of the background may be useful for you and of course we welcome feedback on it, but I don't want to overload you with reading!

I was also thinking about setting up a workshop in January (either week of the 8th or 15th) with our clubs and ranges people and legal, to give us a bit more time and hopefully be able to meet face to face. If that is something you would be interested in attending can you please let me know whether there are days or times that would suit you better?

Ngā mihi,

s9(2)(g)(ii)

s9(2)(g)(ii)
Senior Advisor Firearms Policy
Policy & Partnerships
NZ Police National Headquarters
E s.9(2)(g)(ii)



From: Alexander, Fiona <Fiona.Alexander@justice.govt.nz>

Sent: Wednesday, 13 December 2023 3:20 PM

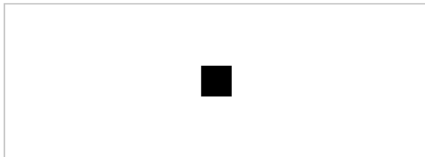
To: s9(2)(g)(ii)

Cc: Ryland, Scott <Scott.Ryland@justice.govt.nz>; Takurua, Patrick <Patrick.Takurua@justice.govt.nz>

Subject: [EXTERNAL] RE: Part 6 clubs and ranges work

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[arms-repeal-for-practical-use-amendment-bill.pdf \(www.parliament.nz\)](#)



Fiona Alexander

Principal Advisor – Harm Reduction and Public Safety

Policy Group

Ministry of Justice | Tāhū o te Ture

s.9(2)(a) OIA



www.justice.govt.nz

From: Alexander, Fiona

Sent: Wednesday, 13 December 2023 3:19 pm

To: s9(2)(g)(ii)

Cc: Ryland, Scott <Scott.Ryland@justice.govt.nz>; Takurua, Patrick <Patrick.Takurua@justice.govt.nz>

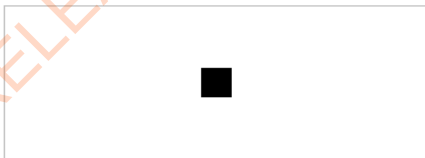
Subject: RE: Part 6 clubs and ranges work

Kia ora s9(2)(g)(ii)

I found this, which may be the Associate Minister's Bill we were speaking about yesterday.

Ngā mihi

Fiona



Fiona Alexander

Principal Advisor – Harm Reduction and Public Safety

Policy Group

Ministry of Justice | Tāhū o te Ture

s.9(2)(a) OIA



www.justice.govt.nz

-----Original Appointment-----

From: s9(2)(g)(ii)

Sent: Wednesday, 13 December 2023 9:26 am

To: WILSON, Richard (RJ); s9(2)(g)(ii) OIA catherinepetrey; BAIRD, Peter; TARTTELIN,

Michael; Wheeler, Sally; Ryland, Scott; Alexander, Fiona

Cc: WHITE, John; CRAWFORD, Steven (Steve); MCILRAITH, Michael (Mike); s9(2)(g)(ii)

Subject: Part 6 clubs and ranges work

When: Wednesday, 13 December 2023 12:30 pm-1:30 pm (UTC+12:00) Auckland, Wellington.

Where: PNHQ-L5 Rm 5.11 (Smartboard) + Teams

Kia ora koutou,

Hope everyone is enjoying the nicer weather this morning!

I've amended and attached the agenda from the last meeting for our discussion today. I'm hoping we can focus more on the gaps and risks if the provisions for clubs and ranges were repealed.

Looking forward to catching up later.

Ngā mihi,

s9(2)(g)(ii)

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Also note, the views expressed in this message may not necessarily reflect those of the New Zealand Police. If you have received this message in error, please email or telephone the sender immediately

Risks and gaps to consider if Part 6 is repealed

Clubs

General

- Recording of members, this is the “who are shooting”. It is important that clubs are aware of their ratio of licensed to unlicensed members so they can provide appropriate supervision.
- Lack of knowledge of where clubs are and what type of activities they are undertaking, how many of their members are licensed.
- Difficulty retaining oversight of ranges if we don't know about the clubs using the ranges.

Clubs who sell firearms/ammunition (reporting

- Many clubs supply and sell firearms and ammunition as an income stream for club activities. They are exempt from becoming dealers/ammunition sellers if they become an incorporated society and meet the reporting requirements.
- Of the 300 non-pistol clubs 167 are selling ammunition, of those 41 are selling firearms.
- Clubs are providing ammunition to new shooters and young people as well as members. We know clubs also bulk purchase large quantities of ammunition.
- There is still a delay on this information going into the registry.
- If we aren't getting this reporting from clubs we will have limited evidence to understand whether firearms or ammunition are being diverted.
- If clubs continue to be exempt from dealer requirements, this will create an obvious loophole for someone wanting to divert firearms and/or ammunition with little oversight and without paying the fee to become a dealer.

Ranges

General

- Oversight /recording of range users, this is the “who are shooting”, we also want to know about shooting unlicensed under supervision
- Understanding of apportion of liability and responsibilities (Shooting Range Operator (SRO), Officer on Duty (OoD)
- Absence of knowledge and awareness of ranges that are operating and their locations, disciplines/types of shooting that ranges are used for
- No oversight, awareness of types of shooting activities conducted on the ranges (types of discipline series, target descriptives, target type use by non-affiliated disciplines (pistols, Field Shooting, Long-range, American Trap Assoc., etc)
- No knowledge of developing shooting trends and competitions and the introduction of new disciplines or shooting series (cowboy, IPSC etc,)

- Introduction of .50 calibre rifles etc, and other large calibre firearms as overseas trends are being introduced e.g., impending arrival of large calibre Pre-Charged Pneumatic (PCP)
- Maintenance of ballistic capability of range (projectile retention within the range with the risk of rounds leaving the range through higher exit, poor back stops or unregulated shooting movements)
- We now have the shooting range manual which was built in consultation with all disciplines and from their best practice standards. If this is just guidance it provides a useful reference but with no ability to enforce it and understand whether ranges are adhering to it.
- Approvals of ballistic capabilities of the range (appropriate firearms calibres for the range)
- General maintenance programmes, in particular post certification and how this is monitored
- Reduced oversight and ability to inspect the secure storage of firearms and ammunition
- Inadequate range safety equipment (fire extinguisher, First Aid)
- Inadequate incident management processes in place. Emergency services process (location for attendance)
- No Range Standing Order's (RSO's) or limited ability to ensure ranges are voluntarily complying with RSO's (RSO's prescribed safety rules for the range)
- Inadequate/incomplete RSO's
- SRO process to ensure compliance with RSO's.
- Uncontrolled shooting activities.
- No OoD process (training, controls recording, understanding, accountability, traceability)
- Supervision of inexperienced or unlicensed shooters
- Shooter safety (ricochet, back splash, pop-over, adjacent ranges etc,)
- Inadequate/appropriate signage (reference to relevance of flag, live firing, danger area signage to prevent unintentional entry into danger area by public, and shooters)
- Monitoring of shooter practices, behaviour, attitudes and conduct,
- Unauthorised access and/or use of the range.
- Range complex security
- Neighbouring property safety, visibility, approvals, resource management, consents (for all ranges but particular concerns around long range rifles)
- Incident reporting/recording process, including injury and near miss. This is currently almost invisible.
- Dealers/gunsmiths use of ranges (test firing/cartridge load development testing/try before you buy)
- Developing expert knowledge based on trends seen developing on ranges ie, ATA competition (American Trap Association), also knowledge of overseas competition/discipline development.

Community knowledge;

- Community trust and confidence that ranges in their location are safe or even exist what disciplines/types the shooting ranges are used for.
- Mechanism for addressing public safety concerns (danger area's)
- No knowledge of,
- Maintenance of ballistic capability of range (projectile retention)
- Inadequate/appropriate signage (reference to relevance of flag, live firing, danger area signage to prevent unintentional egress into danger area) linking to public and shooter safety.
- Dealers/gunsmiths use of ranges (test firing/ cartridge load development testing).
- Confidence that beginners are shooting in a safe controlled environment.

Shooter safety;

- Shooter safety (ricochet, back splash, pop-over, adjacent ranges etc,)
- Maintenance programmes existence,
- Inadequate incident management processes in place.
- Emergency services process (location for attendance)
- Inadequate Range safety equipment (fire extinguisher, First Aid kits).
- Inadequate/incomplete RSO's
- Shooter safety prescriptions in RSO's (hearing and eye protection etc,)
- No OoD process (training, recording, understanding)
- Appropriate control of shooting activities
- Supervision of inexperienced or unlicensed shooters
- Unauthorised access and/or use of the range

Council/Regional Council visibility

- Absence of knowledge and awareness of ranges that are operating and their locations Absence of knowledge by local and regional authority and awareness of ranges that are operating and their locations,
- Appropriate consents
- Potential support for additional range establishment coordination.

Commercial ranges

- Understanding of apportion of liability and responsibilities (SRO, OoD),
- Supervision of inexperienced or unlicensed shooters
- Firearm and ammunition security standard.
- Appropriate control of shooting activities

- Business corporate venues/ events shooting experiences (targets and clay) processes, documentation, safety of participants, Pistol Gallery ranges, selling the experience, range ballistic safety.

Pistol clubs and ranges (in addition to the above)

- Pistols have traditionally had a higher level of regulation and pistol ranges of registered clubs have been the only place you can shoot pistols
- Pistol clubs are also allowed to use prohibited items i.e. large capacity magazines
- Pistol shooting is dynamic and presents different types of ballistic risks to be mitigated.
- It mainly presents risk to the shooter, there are other types of shooting activity (long range rifles) which present different types of risk and potential for greater risk to the public surrounding the range (it is not just pistol target shooting that presents risks to be mitigated)
- Near misses and events not always reported at pistol ranges either
- Would prefer to retain as much as possible in legislation as opposed to a letter of agreement so that the roles and responsibilities are clear and we can enforce the requirements. We know in the past not all clubs and ranges have adhered to the PNZ requirements.
- PNZ had 320 ranges they certified themselves, when we issued 238 improvement notices to pistol clubs it was because they weren't actually meeting their own standards – this is key because it shows that they won't voluntarily meet the best practice standards and the umbrella organisations have limited ability to enforce this
- Some pistol clubs have had very low levels of endorsement holders with plenty of people shooting under supervision

s9(2)(g)(ii), s.9(2)(f)(iv) OIA

From: s9(2)(g)(ii)

Sent: Wednesday, 6 December 2023 11:49 AM

To: BOND, Joanna <Joanna.Bond@police.govt.nz>; KUHN, Lucette
<Lucette.KUHN@police.govt.nz>

Cc: PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>

Subject: RE: Clubs and Ranges - repealing and replacing Part 6, impact

s9(2)(j) OIA, s9(2)(f)(iv) OIA

s.9(2)(h) OIA

From: s9(2)(g)(ii)

s9(2)(g)(ii) OIA: Wednesday, 6 December 2023 9:10 AM

2)(g)(ii)

Cc: PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>

Subject: RE: Clubs and Ranges - repealing and replacing Part 6, impact

Hi **s9(2)(g)(ii)**

We haven't acceded yet – MFAT has put the work on hold again until we get more clarity in the new year, I am going to check in with them again by March next year.

It is definitely something we need to reflect in our advice to Ministers, to support retaining some record keeping for clubs. Its something I can also flag with MFAT and Justice in terms of whether any clubs and ranges amendments could affect New Zealand being compliant with the Protocol.

Thanks for raising it with us.

Ngā mihi,

s9(2)(g)(ii)

s9(2)(g)(ii) ([she/her](#))

[Redacted]

[Redacted]

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s.9(2)(h) OIA

s.9(2)(h) OIA

RELEASED UNDER THE OFFICIAL INFORMATION ACT

 s.9(2)(a) OIA

 Email: michael.tarttelin@police.govt.nz



□

RELEASED UNDER THE OFFICIAL INFORMATION ACT

s.9(2)(g)(ii)

From: s.9(2)(g)(ii)
Sent: Monday, 15 January 2024 10:12 am
To: PETREY, Catherine
Subject: FW: Part 6 clubs and ranges - Justice draft briefing for feedback by midday Monday
Attachments: 2024_01_14 MOJ DRAFT Part 6 briefing - as of 11 01 24.docx; 2024_01_14 Appendix 1 - Requirements for clubs and ranges.docx; PNZ LoA

s.9(2)(h) OIA

From: s.9(2)(g)(ii)
Sent: Friday, 12 January 2024 2:46 PM
To: BOND, s.9(2)(g)(ii)
Subject: FW: Part 6 clubs and ranges - Justice draft briefing for feedback by midday Monday
Importance: High

Hi both,

You may find it particularly useful to go over the appendix summarising the act and regs – I only skimmed it earlier and haven't finished checking whether there are any key parts missing.

Thanks

s.9(2)(g)(ii)

From: s.9(2)(g)(ii)
Sent: Friday, 12 January 2024 12:02 PM
To: s.9(2)(g)(ii) MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>; WILSON, Richard (RJ) <Richard.Wilson@Police.Govt.NZ>; BAIRD, Peter <Peter.Baird@police.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; CRAWFORD, Steven (Steve) <Steven.Crawford@police.govt.nz>; PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>
Cc: WHITE, John <John.White@police.govt.nz>; s.9(2)(g)(ii)
Subject: RE: Part 6 clubs and ranges - Justice draft briefing for feedback by midday Monday
Importance: High

Kia ora koutou,

We have now received the draft briefing from the Ministry of Justice for Associate Minister of Justice, Hon Nicole McKee – *Changes to Part 6 of the Arms Act 1983 relating to shooting clubs and ranges*.

As noted below this is part 1 of 2 briefings. The second will go up in late Feb/early March, and will cover more detailed policy issues and advice. There will be a further opportunity to comment on the next briefing before it goes, we need to try keep our feedback as concise as possible on this briefing.

Justice has requested that we review from a subject matter expertise perspective and provide feedback by **midday Monday 15 January**. Apologies for the very tight deadline but can you please send me your feedback by 10.30am Monday so I can collate and send back to Justice.

I've started making comments in the document already, trying to reflect feedback that you have already provided on the paper I started drafting last year. I've attached a word version and a collab version for you: [MOJ DRAFT Part 6 briefing - as of 11 01 24.docx](#)

If you would prefer to discuss it with me, I'm happy to do a phone call instead.

I'm hoping we will at least have a chance on Monday afternoon to discuss our feedback with Justice, and get an update on the work from their perspective.

In summary, the briefing:

- Outlines the current regulatory regime for clubs and ranges, as well as the concerns and priorities for change for the Minister
- Sets out a proposed approach to delivering the changes, including steps, timing, and opportunities for consultation
- Provides initial policy advice in key areas, including criteria for analysis, initial decisions, and future decisions

Section 3 is probably the area to focus your review:

s. 9(2)(f)(iv)

Main feedback so far:

- s.9(2)(g)(i) OIA

- The paper should provide balanced advice that reflects the safety risks associated with other non-pistol shooting activities, and reference that the evidence shows the most commonly stolen firearms are 'standard' rifles and shotguns. There are also other options like maintaining oversight of all types of shooting range activities, that would be better considered in the next detailed briefing.

- s. 9(2)(f)(iv)

- s. 9(2)(f)(iv)

- s. 9(2)(f)(iv)

Ngā mihi,

s.9(2)(g)(ii)

s.9(2)(g)(ii) (she/her)

Senior Advisor Firearms Policy

Policy & Partnerships

NZ Police National Headquarters

E s.9(2)(g)(ii)

My normal hours of work are 8am-4pm Monday, Tuesday, Wednesday and Friday.



From: s.9(2)(g)(ii)

Sent: Wednesday, 10 January 2024 3:47 PM

To: s.9(2)(g)(ii)

MCILRAITH,

Michael (Mike) <Michael.McIlraith@police.govt.nz>; WILSON, Richard (RJ) <Richard.Wilson@Police.Govt.NZ>;

TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; BAIRD, Peter <Peter.Baird@police.govt.nz>; PETREY,

Catherine <Catherine.Petrey@Police.Govt.NZ>

Cc: WHITE, John <John.White@police.govt.nz>

Subject: RE: Part 6 clubs and ranges working draft for feedback

Kia ora koutou,

Hope everyone had a relaxing break!

Apologies for the rescheduling of the part 6 meeting next week, thank you for being flexible with diary time.

Thanks to those of you who have provided feedback on the working draft document. I've been reading through all of it.

I just wanted to update you on next steps for this work ahead of the meeting next week.

The Ministry of Justice is preparing a briefing for the Associate Minister of Justice for the 19th of January. This briefing will cover the work programme and next steps for this work, and propose an approach for the work. It is not intended to give detailed policy advice or options on the proposals. Justice will send us a draft of this briefing soon and we will have an opportunity to comment on it or provide additional background.

The Ministry will then prepare a more detailed briefing for late February for the Associate Minister of Justice. This briefing will give more detailed policy advice and options for the proposed changes, and seek agreement to draft a Cabinet paper. We will again work closely with Justice to support the drafting of this briefing and provide background information to support the paper. We will likely also prepare a short paper for the Minister of Police at this stage to update on the work.

We will keep you in the loop when we receive the first draft briefing from Justice to give everyone an opportunity to contribute to our feedback.

We appreciate everyone being agile and contributing to regular discussions as the work is shaping up and timelines are moving around.

Please let me know if you are unable to make the meeting next week - I'm happy to catch up separately. I will circulate an agenda ahead of the meeting.

Ngā mihi,

s.9(2)(g)(ii)

s.9(2)(g)(ii) (she/her)
Senior Advisor Firearms Policy
Policy & Partnerships
NZ Police National Headquarters

E s.9(2)(g)(ii)

My normal hours of work are 8am-4pm Monday, Tuesday, Wednesday and Friday.



From: s.9(2)(g)(ii)

Sent: Monday, 18 December 2023 6:56 AM

To: s.9(2)(g)(ii); MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>; WILSON, Richard (RJ) <Richard.Wilson@Police.Govt.NZ>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; BAIRD, Peter <Peter.Baird@police.govt.nz>; PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>; Alexander, Fiona <Fiona.Alexander@justice.govt.nz>; Ryland, Scott <Scott.Ryland@justice.govt.nz>; Takurua, Patrick <Patrick.Takurua@justice.govt.nz>
Cc: WHITE, John <John.White@police.govt.nz>; sally.wheeler@justice.govt.nz
Subject: Part 6 clubs and ranges working draft for feedback

Kia ora koutou,

As discussed, I'm circulating a working draft about clubs and ranges for your input, ideally by mid-January.

Feel free to edit directly in track changes or make comments  [20231215 clubs and ranges draft.docx](#), if you prefer to work offline, I've attached a word version.

Noting this is still very working draft and just aiming to collate some of the relevant background from the Police perspective. The shape of the final paper will look quite different, this is mostly about getting relevant content together in one place.

I've also attached a bullet point list of risks/gaps, some of which we have already discussed, thank you Mike T for pulling most of these together.

Thank you all for your time to discuss this work over the past couple of weeks. I hope everyone has a lovely break and look forward to catching up again in the new year!

Ngā mihi,

s.9(2)(g)(ii)

s.9(2)(g)(ii) (she/her)

Senior Advisor Firearms Policy

Policy & Partnerships

NZ Police National Headquarters

E s.9(2)(g)(ii)

My normal hours of work are 8am-4pm Monday, Tuesday, Wednesday and Friday.



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From: [TARTTELIN, Michael](#)
To: [s9\(2\)\(g\)\(ii\)](#)
Cc: [CRAWFORD, Steven \(Steve\)](#)
Subject: RE: Further club data FW: Question RE: Information for Review of Part 6
Date: Tuesday, 19 December 2023 3:17:39 pm
Attachments: [image001.png](#)
[image005.jpg](#)
[image002.jpg](#)

Catherine,

A response to your further inquiry

1. Anyone supervising an unlicensed shooter to shoot must have a firearms license. If we became aware of a situation where that is occurring at a club or range then we did we would deal with it immediately. There is a scenario where people may be providing coaching (potentially no longer a license holder) but that can't extend to supervising an unlicensed person to shoot (your reference to NRANZ I am also not aware of).
2. All NZDA HUNT's instructors have to have a f/Licno before they can qualify (I know this to be fact as I am a NZDA HUNT's instructor)
3. We have accepted range applications from commercial range operators who didn't have a dealers license as long as we can see that they have applied and begun the process to obtain one. The challenge was that these ventures/businesses existed and operated prior to the inception of C & R with or without NZPolice District Firearms knowledge. [s.9\(2\)\(a\) OIA](#)

[REDACTED]

We have done a lot of work with range operators that we know of. Because the dealers team is part of compliance we are seeing some of their dealers applications being processed. Early when back from New years my admin ladies will do a further audit to see what the state is – it has not been overlooked but we have not been in a position to do this at the moment. We would then re-engage with the operators to find out what has occurred and deal with it appropriately.

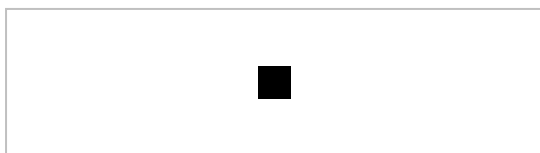


Senior Sergeant Mike Tarttelin
Manager Clubs and Ranges



[s.9\(2\)\(a\) OIA](#)

✉ Email: michael.tarttelin@police.govt.nz



[]

From: PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>

Sent: Tuesday, 19 December 2023 2:02 PM

To: TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; s9(2)(g)(ii)

Cc: WILSON, Richard (RJ) <Richard.Wilson@Police.Govt.NZ>; BAIRD, Peter <Peter.Baird@police.govt.nz>; CRAWFORD, Steven (Steve) <Steven.Crawford@police.govt.nz>

Subject: RE: Further club data FW: Question RE: Information for Review of Part 6

Thanks Mike really appreciate this. 2 questions in red below.

I will contact you in the New Year

From: TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>

Sent: Thursday, 14 December 2023 2:28 PM

To: PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>

Cc: WILSON, Richard (RJ) <Richard.Wilson@Police.Govt.NZ>; BAIRD, Peter <Peter.Baird@police.govt.nz>; CRAWFORD, Steven (Steve) <Steven.Crawford@police.govt.nz>

Subject: Further club data FW: Question RE: Information for Review of Part 6

Catherine,

In response to your inquiry;

- Of the 300 non-pistol club applications received, 95 did not indicate that they operate a range.
- Of the 300 Club applications received - 167 of these declared that they sell ammunition, and of these (167 clubs), 41 also declared that they also sell firearms.
- The original club application form, which was extensively reviewed and approved by policy, only required a declaration as to whether clubs were 'selling' - it didn't address the other aspects of 'supplying, lending or providing' of firearms or ammunition. As soon as this was realised, the form was modified, however the majority of applications had been received by then. Back capturing of this information is now being addressed through the subsequent visits/inspections. As such, these numbers do not accurately reflect the reality.
- Most of the Smallbore clubs (111 applications) and Clay target clubs (75 applications) hold business house competitions, host public open days or host community groups (scouts, school groups, etc) where they provide attendees with the use of a target rifle/shotgun and ammunition to participate under supervision (attendees may or may not hold a firearms license). I understand that but do those giving supervision hold one. It appears that for young people some of the coaches do not hold a current licence and likewise the NRANZ person also advised that some of the people they use for supervision may have held a licence once but no longer do.
- NZ DeerStalkers Assn, conduct a training courses called "HUNT's", where people are taught aspects of hunting). Those participants may not have a firearms license or a

firearms. Normally, they would be provided with 'club' firearms and ammunition to participate. **See comment above**

- There are 65 commercial range operators that are not clubs, and for the majority, they provide firearms and ammunition ie, the wedding venue/function centres', corporate teambuilding businesses, country retreat/experience venues. They are therefore required to have someone holding a dealers license's. Prior to the legislation the majority did not hold this licence and in a vast majority of case's this didn't occur. **Has that happened since? What follow-up have we done if any?**
- Pistol club data regarding who is selling ammunition is not **currently** available.



Senior Sergeant Mike Tarttelin
Manager Clubs and Ranges



s.9(2)(a) OIA

✉ Email: michael.tarttelin@police.govt.nz



[]

From: PETREY, Catherine <Catherine.Petrey@Police.Govt.NZ>

Sent: Friday, 8 December 2023 1:59 PM

To: TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>

Subject: FW: Question RE: Information for Review of Part 6

Mike of the 300 non pistol clubs do we know how many of these do not operate a range. We know that 3 pistol clubs don't but what about the others. I know several deer stalker clubs don't. What else?

Also do we know the number of pistol clubs and separately non-pistol clubs that declared they supplied firearms and ammo.

This will be useful data.
CP

From: PETREY, Catherine

Sent: Friday, 8 December 2023 1:56 PM

S9(2)(j) OIA, s9(2)(f)(iv) OIA



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SHOOTING CLUB REQUIREMENTS IN ACT AND REGULATIONS

Shooting club application [for certificate of approval]			
Requirement	Act	Regulations	Other relevant provisions
Pistol clubs – must be incorporated society	38B(2)		
Shooting clubs on whose behalf firearms or ammunition are sold – must be an incorporated society	38C(2)		Arms Act, s 5(3)(b): Ordinarily a dealer licence is required for these activities but an exception applies where a club member: a. Sells, hires, lends, or supplies to a club member or on club premises, with the approval of the management committee of the club or a majority vote of club members; and b. The revenue from the sale, hire, lending, or supply of the firearms is used for the benefit of the club. Section 38C and 5(3)(b) were both inserted by the Select Committee.
Person making application must be: a. A person authorised to make the application – if the shooting club is a body corporate; or b. The club's representative who is authorised to make the application – if the shooting club is not a body corporate	38D(1)		
Application must be made in the manner prescribed by regulations	38D(1)		
Application must be made: a. In writing in hard copy form; or b. Electronically (for example, by email or through an Internet site)	38D(1)	28F	
Application must be in a form approved by the Commissioner	38D(2)		
Commissioner needs to be satisfied that the shooting club: a. Will be using a certified shooting range for its shooting activities b. Has rules relating to the safe operation of firearms and promotes the safe possession and use of firearms c. Is appropriately administered d. Is able to safely manage its shooting activities e. Has proper storage for any firearm or ammunition held at any of the club's premises or at a shooting range used by the club	38F		
Application must state— (a) the name and contact details of the applicant; and (b) the name of the club; and (c) the address of the premises used by the club, if any; and (d) the name and contact details of at least 1 contact person for the club; and (e) the names of officers of the club; and (f) whether the club is an incorporated society; and (g) the New Zealand Business Number of the club, if the club has a New Zealand Business Number; and (h) the shooting discipline or shooting disciplines of the club; and (i) the aims, objectives, and proposed activities of the club; and (j) the name and address of each shooting range used by the club for its shooting activities; and (k) whether firearms or ammunition will be stored at any premises used by the club or at any shooting range used by the club; and (l) any other information the Commissioner may reasonably require. Application must include a declaration by the applicant that all of the information provided in the application is true and correct. The applicant must— (a) sign the application form; or (b) use an electronic identity credential within the meaning of section 8 of the Electronic Identity Verification Act 2012.	38B, 38C, 38D, 38F, 38I	28G	
Application must be supported by prescribed information and documents	38D(2)b)		
Application must be supported by: a. A copy of the club's constitution or rules; and b. A copy of the minutes (of the clubs last AGM, or of the inaugural AGM if it is newly constituted) c. Evidence that the applicant is authorised by the club to make the application on its behalf [Publicly available information from the relevant Incorporated Societies register does not need to be provided]	38D(2)(b), 38F	28GA(1), 28GB	

Pistol clubs – applications must also include: a. The names of all club members; and b. The firearms licence numbers of all club members who hold a firearms licence; and c. Details of the process for recording club member and visitor participation in shooting activities organised by the club	38B, 38E, 38F	28GA(2)(a)	Arms Act, ss 29(2)(a), 33(1), 50: Target pistol shooting endorsements may only granted to people who are members of an incorporated pistol club that holds a certificate of approval. The endorsement may be revoked if the person no longer meets the application criteria (e.g. they are not a member of a pistol club); or if the person has failed to observe any conditions on their endorsement. Only endorsement holders may provide immediate supervision of persons who do not have an endorsement. Arms Regulations, reg 22: Conditions of the endorsement include that: • the holder may only use the pistol on a certified target pistol shooting range; and • must participate in scheduled shooting activities organised by the pistol shooting club on which they are a member and on the pistol ranges used by that club on at least 12 days in each year; and • must notify Police within 28 days if they become a member of another pistol shooting club, their membership application to another pistol shooting club is declined, or they cease to be a member of a pistol shooting club for any reason
Shooting clubs on whose behalf firearms or ammunition are sold – applications must also include a financial report, approved in accordance with the club’s rules, that contains sufficient detail to provide:: a. A reconciliation of all firearms and ammunition purchased, held, and sold on behalf of the club; and b. Evidence that the revenue will be used for the benefit of the club	5(3)(b)	28GA(2)(b)	Arms Act, s 5(3)(b): Ordinarily a dealer licence is required for these activities but an exception applies where a club member: a. Sells, hires, lends, or supplies to a club member or on club premises, with the approval of the management committee of the club or a majority vote of club members; and b. The revenue from the sale, hire, lending, or supply of the firearms is used for the benefit of the club.
Application must be accompanied by prescribed fee (\$140)	38D(2)(c)	Schedule 1A	
Commissioner may request the applicant to provide any further information that the Commissioner considers necessary to determine the application	38E(b)		
Shooting club ongoing obligations			
Requirement	Act	Regulations	Other relevant provisions
File an annual report not later than 5 months after the end of its financial year including particulars in regulations	38K		
Annual report must: a. Provide details of any changes to club’s constitution or rules; b. Provide details of any changes to club’s officers; and c. Include the minutes of the last AGM [But publicly available incorporated society information need not be included]	38K	28GO 28GP	Arms Act, ss 38I(1)(c) and 38F(c): Commissioner must cancel a shooting club’s certificate of approval if satisfied that the club no longer meets the requirements in s 38C or 38F, including the requirement in that the club is appropriately administered.
Pistol clubs – the annual report must also include: a. Names of all club members; and b. Firearms licence numbers of all club members who hold a firearms licence; and c. A list of the shooting activities organised by the club that were held and the location; and d. A list of the shooting activities organised by the club that are planned to be held in the following year and the location.	38K, 74(1)(gb)	28GO(3)	Arms Act, ss 29(2)(a) and 33(1), 74(1)(gb): Target pistol shooting endorsements are only granted to people who are members of an incorporated pistols club that holds a certificate of approval. The endorsement may be revoked if the person no longer meets the application criteria (e.g. they are not a member of a pistol club); or if the person has failed to observe any conditions on their endorsement. Regulations may prescribe the particulars to be included in annual reports of shooting clubs, including (but not limited to) finances, storage, safety, discipline, training, competitions, office holders, membership, participating non-members, attendance, and ratios of members who are licence holders, endorsement holders, or trained range officer to those who are not.: Arms Regulations, reg 22: Conditions of the endorsement include that: • the holder may only use the pistol on a certified target pistol shooting range; and • must participate in scheduled shooting activities organised by the pistol shooting club on which they are a member and on the pistol ranges used by that club on at least 12 days in each year; and • must notify Police within 28 days if they become a member of another pistol shooting club, their membership application to another pistol shooting club is declined, or they cease to be a member of a pistol shooting club for any reason..
Shooting clubs on whose behalf firearms or ammunition are sold – the annual report must also include a financial report in accordance with the club’s rules, containing sufficient detail to provide- a. A reconciliation of all firearms and ammunition purchased on behalf of the club with the firearms held or sold on behalf of the club; and b. Evidence that all revenue generated by the sales was used , or is to be used, for the benefit of the club.		28GO(3)	Arms Act, s 5(3)(b): Ordinarily a dealer licence is required for these activities but an exception applies where a club member: a. Sells, hires, lends, or supplies to a club member or on club premises, with the approval of the management committee of the club or a majority vote of club members; and b. The revenue from the sale, hire, lending, or supply of the firearms is used for the benefit of the club.

Facilitate on-notice inspections of: a. Any place where the club stores ammunition or firearms b. Shooting club documents	38U		
Pay the annual compliance activities fee prescribed each year (\$30 per year; or \$40 per year if firearms and/or ammunition are sold on behalf of the club)	80	28GQ and Schedule 1A	
Comply with an improvement notice if one is issued	38V		
Notify the Commissioner if the club ceases to operate or amalgamates with another club	38J	28GD(1)	Arms Act, s 38J: The Commissioner may require a shooting club to reapply for a certificate of approval if the club has amalgamated with another club that has a different discipline.
Maintain a list of all current members, and the firearms licence numbers of all current members who hold a firearms licence		28GE(1)	Arms Act, ss 20 and 22(2): It is an offence to possess a non-prohibited firearm without a firearms licence. It is a defence to a charge under s 20 if the person is at all times under the immediate supervision of a licence holder.
Pistol clubs – must notify Police within 28 days if any of the following events occurs: a. A person joins the club as a new member (providing the name of the new member and their firearms licence number, if any). b. The club declines a person's membership application (providing the applicant's name and reason for declining the application) c. A person ceases to be a club member for any reason (providing the name of the former member and the date on which their membership ceased).		28GE(2) & (3)	Arms Act, ss 29(2)(a) and 33(1): Target pistol shooting endorsements are only granted to people who are members of an incorporated pistol club that holds a certificate of approval. The endorsement may be revoked if the person no longer meets the application criteria (e.g. they are not a member of a pistol club); or if the person has failed to observe any conditions on their endorsement. Arms Regulations, reg 22: Conditions of the endorsement include that: - the holder may only use the pistol on a certified target pistol shooting range; and - must participate in scheduled shooting activities organised by the pistol shooting club on which they are a member and on the pistol ranges used by that club on at least 12 days in each year; and - must notify Police within 28 days if they become a member of another pistol shooting club, their membership application to another pistol shooting club is declined, or they cease to be a member of a pistol shooting club for any reason..
A person must not be a member of a committee of a shooting club if the person: a. Is disqualified under s 22H from holding a firearms licence; or b. Has had a firearms licence revoked within the previous 5 years.		28GF(1)	Arms Act, ss 22H, 24, 27(2), 27C, 49A, 60A(1)(a) and (c): Disqualified persons may not hold a firearms licence. A person who is not fit and proper should not be able to reasonably likely obtain access to a licence holder's firearms. Revoked persons may not lawfully possess firearms (even under immediate supervision).
Pistol clubs – A person must not be a member of the committee of a pistol shooting club if: a. Is disqualified under s 22H from holding a firearms licence; or b. They have had a firearms licence revoked within the previous 5 years; or c. They have had an endorsement revoked on their firearms licence revoked within the previous 5 years.		28GF(2)	Arms Act, ss 19C, 22H, 24, 27(2), 27C, 44, 49A, 50, 60A(1): Disqualified persons may not hold a firearms licence. A person who is not fit and proper should not be able to reasonably likely obtain access to a licence holder's firearms. Revoked persons may not lawfully possess firearms (even under immediate supervision). It is an offence to supply a pistol to a person without a permit, and to possess a pistol without an endorsement and permit, although there is a defence if the pistol is possessed for use on a range of an incorporated pistol club recognised by the Commissioner and at all times under the immediate supervision of a firearms licence holder with a target pistol shooting endorsement.
Give notice to the Commissioner within 28 days of: a. A change in contact person for the club. b. A change in the name of contact details of a contact person for the club		28GG	
<u>Security for firearms and ammunition</u> If any firearms or ammunition (or both) are stored on the premises used by the shooting club (including firearms or ammunition that on the premises used by a shooting club and not in the physical possession of a licence holder), the shooting club must ensure: a. The premises are structurally sound, with strong, well-maintained exterior doors, locks etc and with well-maintained windows with locks etc (approved by Police) b. Whenever the premises are unoccupied, all reasonable steps are taken to secure the premises against unlawful entry. c. The premises have storage facilities to enable firearms stored on the premises to be locked in a steel box, cabinet or safe etc (approved by Police) d. The premises have storage facilities for ammunition stored on the premises (approved by Police) Pistols, pistol magazines, and pistol carbine conversion kits can only be stored overnight with prior written consent from Police)	38I(c), 38F(e), 74(1)(j)	28GH, 28GI	38I(c), 38F(e), 74(1)(j): The club has to have proper storage for any firearm or ammunition held at any of the club's premises or at a shooting range used by the club. Regulations may be made providing for the security of premises at which any firearm or class of firearm is kept, and prescribing precautions to be taken to prevent the theft or misuse of firearms, airguns, pistols, prohibited items, restricted weapons, pistol carbine conversion kits, ammunition and explosives in the possession of any person or class of persons.

<u>Young people participation</u> Pistol clubs – must comply with conditions regarding immediate supervision of the young person and then limiting the continued participation of that young person once they have turned 17 if they have not done certain things (like applied for a firearms licence and endorsement)		28GJ	Arms Act, ss 23(1)(a), 29(2)(a), 33(1), 50(4); Arms Regulations, reg 22: Target pistol shooting endorsements are only granted to people who are members of an incorporated pistol club that holds a certificate of approval and who only shoot on certified ranges and maintain active involvement (at least 12 shoots annually) in that club. There is a defence to unlawful possession of pistols while on an approved range and under immediate supervision of an appropriate endorsement holder (s 50(4)), which enables visitors to a club to experience pistol shooting before joining and applying for a licence and endorsement, and then while their applications are being considered. Persons under 16 cannot apply for a firearms licence or an endorsement.
<u>Other visitor participation</u> Pistol clubs – must comply with conditions regarding persons without a target pistol shooting endorsement on their firearms licence participating in shooting activities limiting their continued participation after 3 shoots and then after a further 12 months if certain things have not occurred (including applying for and then successfully obtaining an endorsement on their firearms licence)		258GK	Arms Act, ss 29(2)(a), 33(1), 50(4); Arms Regulations, reg 22: Target pistol shooting endorsements are only granted to people who are members of an incorporated pistols club that holds a certificate of approval and who only shoot on certified ranges and maintain active involvement (at least 12 shoots annually) in that club.. There is a defence to unlawful possession of pistols while on an approved range and under immediate supervision of an appropriate endorsement holder (s 50(4)), which enables visitors to a club to experience pistol shooting before joining and applying for a licence and endorsement, and then while their applications are being considered.
<u>Records of participation</u> Pistol clubs – Must keep a record of shooting activities organised by the club each year and provide it to Police not later than 28 days after the end of the year. The record must show for each shooting activity: - The date of the shooting activity; and - The names of all persons (including persons who are not club members) who participated in the shooting activity; and - The firearms licence numbers of all participants who hold a firearms licence.		28GL	Arms Act, ss 29(2)(a), 33(1), 50; Arms Regulations, reg 22: Target pistol shooting endorsements are only granted to people who are members of an incorporated pistols club that holds a certificate of approval and on the condition that they only shoot on certified ranges and maintain active involvement (at least 12 shoots annually) in that club. Pistol shooting endorsements contain a condition that the endorsement holder notify Police of club membership changes or applications for membership being declined. An endorsement may be revoked if the holder does not comply with the conditions on the endorsement. Persons without endorsements must be under immediate supervision of an endorsement holder at all times in accordance with s 50(4).
Shooting clubs on whose behalf ammunition is sold Must keep a record (for 10 years) of the following details of the sale: - The seller's name and firearms licence number - The purchaser's name and firearms licence number (or the name and firearms licence number of their supervisor) - The quantity and type of ammunition sold.. [If the club provides the details for inclusion in the registry, it does not need to comply with this obligation to keep records]		28GM	Arms Act, s 5(3)(b): Ordinarily a dealer licence is required for these activities but an exception applies where a club member: - Sells, hires, lends, or supplies to a club member or on club premises, with the approval of the management committee of the club or a majority vote of club members; and - The revenue from the sale, hire, lending, or supply of the firearms is used for the benefit of the club.
Must maintain an up to date record (for 5 years) of any incidents or safety breaches that have occurred during any shooting activity organised by the club that did not result in injury to, or the death of, any person but had the potential to do so. [If the club provides the details for inclusion in the registry, it does not need to comply with this obligation to keep records]	38I(1)(c) and (2)(c), 38F(d)	28GN	The Commissioner may cancel a shooting club's certificate of approval if satisfied that the shooting club has failed to report any serious firearms-related safety incident, and must cancel the certificate if no longer satisfied that the club is able to safely manage its shooting activities.
Re-application [shooting club]			
Requirement	Act	Regulations	Other relevant provisions
Certificate of approval has no expiry date (continues until surrendered by the club or cancelled by the Commissioner) but Commissioner may require the club to reapply for a certificate of approval if: - The club has amalgamated with another shooting club that has a different discipline; or - The club is an incorporated society that has ceased to be registered for 2 years	38H and 38J		
SHOOTING RANGE REQUIREMENTS IN ACT AND REGULATIONS			
Shooting range application [for certificate of approval]			
Requirement	Act	Regulations	Other relevant provisions
Application must be made by: - The person proposing to operate the range (if an individual) - A person authorised to make the application (if a body corporate is proposing to operate the range) - The range operator's representative who is authorised to make the application (if the proposed range operator is not an individual or a body corporate)	38M(1)		
Application must be made in the manner prescribed by regulations	38M(2)		
Application must be made: - In writing in hard copy form; or - Electronically	38M(2)	28GS	

Must be in a form approved by the Commissioner	38M(2)(a)		
Must be supported be accompanied by the prescribed application fee [set out in Schedule 1A to the Regulations – for example: a. The application fee for a new application for a single shooting range (that is not a clay target shooting range, and is not a one time use shooting range) is \$400. b. An application for renewal where there has been no significant change in circumstances is \$200.]	38M(2)(c)	Schedule 1A	
Commissioner must be satisfied that: a. The shooting range meets all required safety standards published by the Commissioner; and b. All necessary territorial and regional council consents to operate the shooting range have been obtained	38O		
Application must state – (a) the name and contact details of the applicant; and (b) the name and contact details of the range operator, if the range operator is not the applicant; and (c) the name of the shooting range; and (d) the address of the shooting range; and (e) the New Zealand topographical map number and co-ordinates on that map of the shooting range; and (f) the name and contact details of at least 1 contact person for the shooting range; and (g) the New Zealand Business Number of the range operator, if the range operator has a New Zealand Business Number; and (h) the firearms licence number of the range operator, if the range operator is an individual; and (i) the types of firearms and the maximum calibre to be used at the shooting range; and (j) the date or dates on which the shooting range is proposed to be used, if the shooting range is a one-time-use shooting range; and (k) any other information the Commissioner may reasonably require.	38L, 38M, 38N, 38O, 38Q, 38S	28GT(1)	
An application must include a declaration by the applicant that— (a) all necessary territorial authority and regional council consents in respect of the shooting range have been obtained; and (b) all landowners affected, or likely to be affected, by the operation of the shooting range have consented to its operation; and (c) all of the information provided in the application is true and correct.	38N, 38O, 38Q, 38S	28GT(2)	
The applicant must— (a) sign the application form; or (b) use an electronic identity credential within the meaning of section 8 of the Electronic Identity Verification Act 2012.	38D	28GT(3)	<i>New Zealand Police Shooting Range Manual</i> Landowner permission (including the range danger area) 4.12 Landowners who are affected by the operation of a shooting range and its associated danger area must consent to the use of their land as a shooting range before a shooting range can be certified. It is necessary to seek new permission when land ownership changes. It is recommended that permission is recorded in writing. For security of tenure, a shooting range operator is likely to want a formal arrangement for the land covered by the range operations.
Must be supported by any information and documents that are prescribed	38M(2)(b)		
Application must be supported by: a. A copy of the range standing orders for the shooting range; and b. A copy of an inspection report undertaken by a shooting range inspector recognised by the Commissioner; and c. Evidence that the applicant is authorised to make the application, if made under s 28M(1)(b) or (c) of the Act.	38M, 38O, 38Q, 38S	28GU	
Ranger operator can apply for certification of multiple ranges on the same site that are operated by the same operator on one application form, in which case the above is modified so that the application includes information for those multiple ranges		28GV	
Must be accompanied by the prescribed application fee	38M(2)(c)	Schedule 1A	
Commissioner may request the applicant to provide any further information or documents	38N(b)		
Shooting range ongoing obligations			
Requirement	Act	Regulations	Other relevant provisions
Certification is granted subject to the condition that there is an officer on duty (who holds a firearms licence and is appropriately trained in shooting range safety management) at all times the range is in use	38Q(1)		Arms Act, s 38S: Commissioner may cancel range's certification if satisfied that the shooting range is not being operated with proper regard to individual or public safety; or if the range is not complying with obligations in s 38Q (which includes the obligation to have an officer on duty).

Must keep a record for each year of the officers who are on duty from time to time and meet the requirements in s 38Q(1), stating: a. The name of the officer; and b. Firearms licence number of the officer; and c. The training that the officer has had in shooting range safety management. The record must be retained for 2 years from the end of the year to which it relates	38Q(1)	28GZB	Arms Act, s 38S: Commissioner may cancel range's certification if satisfied that the shooting range is not being operated with proper regard to individual or public safety; or if the range is not complying with obligations in s 38Q (which includes the obligation to have an officer on duty).
May also be other conditions with regard to maintenance of the shooting range, public access to the shooting range, restrictions on the types of firearms and ammunition that may be used there, and competitions that may be conducted at the shooting range	38Q(2)		Arms Act, s 38S: Commissioner may cancel range's certification if satisfied that the shooting range is not being operated with proper regard to individual or public safety; or if the range is not complying with obligations in s 38Q.
<u>Range standing orders</u> Must: a. maintain range standing orders for the range that include all information required by Police, and they must be approved by Police. b. At all times while operating the range, comply with the range standing orders. c. Have any changes to the range standing orders approved by Police if the change will or may affect the ballistic characteristics of the shooting range, or the operation or safety of the shooting range. d. Take all reasonable and practicable steps to ensure that all persons using the shooting range have access to the current version of the range standing orders and are advised of any change to them.	38O(a), 38Q, 38S	28GZC	Arms Act, ss 38O(a), 38Q, 38S: Range must be operated with proper regard to individual and public safety, must meet the safety standards published by the Commissioner, and conditions that the certification is granted subject to. <i>Police Range Manual</i> contains the safety standards. Commissioner may cancel range's certification if satisfied that the shooting range is not being operated with proper regard to individual or public safety, or not in compliance with conditions.
<u>Security for firearms and ammunition</u> If any firearms or ammunition (or both) are stored on the premises of the shooting range (including firearms or ammunition that are on the premises of the shooting range and not in the physical possession of a licence holder), the shooting range operator must ensure: a. The premises are structurally sound, with strong, well-maintained exterior doors, locks etc and with well-maintained windows with locks etc (approved by Police) b. Whenever the premises are unoccupied, all reasonable steps are taken to secure the premises against unlawful entry. c. The premises have storage facilities to enable firearms stored on the premises to be locked in a steel box, cabinet or safe etc (approved by Police) d. The premises have storage facilities for ammunition stored on the premises (approved by Police) Pistols, pistol magazines, and pistol carbine conversion kits can only be stored overnight with prior written consent from Police)	38S, 74(1)(j)	28GZD 28GZE	Arms Act, s 38S, 74(1)(j) A shooting range's certificate may be cancelled if the Commissioner is satisfied that the range is not being operated with proper regard to individual or public safety. Regulations may be made providing for the security of premises at which any firearm or class of firearm is kept, and prescribing precautions to be taken to prevent the theft or misuse of firearms, airguns, pistols, prohibited items, restricted weapons, pistol carbine conversion kits, ammunition and explosives in the possession of any person or class of persons.
Maintain (for 5 years) an up-to-date record of any incidents or safety breaches that have occurred on any shooting range operated by the range operator and that did not result in injury to, or the death of, any person but had the potential to do so. [If the range operator provides the details for inclusion in the registry, it does not need to comply with this obligation to keep records]	38S		Arms Act, s 38S: 'A shooting range's certificate may be cancelled if the Commissioner is satisfied that the range is not being operated with proper regard to individual or public safety.
Must request Commissioner to review the range certification if intended the operation of the range will depart from conditions imposed	38Q(3)		
Must give notice to the Commissioner (within 28 days) of a change in contact person, contact person name or contact details.		28GZA	
Re-newal / re-application [shooting range]			
Requirement	Act	Regulations	Other relevant provisions
Certificate of approval lasts for 5 years (unless sooner surrendered or cancelled); and can be renewed on one or more occasions. If the circumstances of the shooting range have not changed significantly for 5 years, the applicant may initiate renewal by using another form, rather than the initial application form.	38R 38T		
<u>Significant change in circumstances of the range</u> If there have been any significant changes to the circumstances of the range in the previous 5 years, the process in regs 28GS to 28GV applies. <u>No significant change in circumstances of the range</u> If there is been no significant change to the circumstances of the range in the previous 5 years, the application for renewal may be made in the form approved by the Commissioner stating the information set out in 28GX(1) and supported by the documents in 28GX(2)	38R 38T	28GW 28GX	

[some information and documents that are required for first time applications or where there has been a change of circumstances, are not required for these renewals]			
Renewal application can cover multiple ranges on the same site and operated by the same range operator		28GY	

RELEASED UNDER THE OFFICIAL INFORMATION ACT



1845

First control of firearms in New Zealand – Arms Importation Ordinance Act 1845.



1920

Legislation introduced requiring registration of rifles and shotguns due to large numbers of returned servicemen taking their own lives with these firearms.



1958

Arms Act 1958 enacted due to changes in criminal environment. All firearms registered (paper record system used).



1983

Arms Act 1983 enacted. Rifles and shotguns no longer needed to be registered. Pistols and restricted weapons (fully automatic or select-fire firearms) required to be registered. Firearms licences required for all firearms users. Introduction of lifetime firearms licence. Limited control over ammunition.



1984

Deregulation of NZ economy triggered the removal of export incentives and import licensing. Importation of AK47, SKS, M16/A15 type firearms became more readily available for a wide range of firearms licence holders.



2016 – 2017

Law and Order Committee. Inquiry Illegal Possession of Firearms recommend restricted category for semi-automatics.



2013

Establishment of Firearms Community Advisory Forum (FCAF). Numerous reviews, reports, and efforts were made to improve the arms system and address emerging risks.



1996–1997

Thorp Review of Firearms Control in New Zealand. Key recommendation to ban semi-automatic firearms.



1992

Arms Amendment Act 1992 and Arms Regulations 1992 enacted. Changes included moving all lifetime firearms licence holders onto a 10 year licensing cycle and requiring an endorsement on a licence for those that possessed military style semi-automatic firearms (MSSAs). However, MSSAs in a sporting configuration did not require an endorsement.



1990

Aramoana massacre, 13 killed by semi-automatic firearms on 13 November.



2019

15 March 2019, Christchurch mosque attacks, 51 killed. Gunman used semi-automatic firearms
12 April Arms Act amended to prohibit many semi-automatic firearms and established a buy-back programme. Government signalled further legislative changes would be made to the Act. Arms Amendment Bill introduced to Parliament in September.



2020

Royal Commission of Inquiry Report. The Arms Legislation Act 2020. This Act allowed some immediate changes to the Arms Act, and further changes over the following three years. Establishment of Minister's Arms Advisory Group (MAAG) including firearms licence holders and non-licence holders.



2021

Drafting of detailed business case seeking appropriate funding from Government for Police to deliver effective regulatory services. Arms Act 1983 incorporates the first parts of Arms Legislation Act (ALA) reforms.



2022

Funding for new regulatory agency provided in May 22 Budget. Arms Act 1983 incorporates the second group of ALA reforms and second phase of Regulations came into force extending regulatory oversight to shooting Clubs and Ranges. Te Tari Pūreke launched in November 2022.



2023

Arms Act 1983 incorporates the third (and final) group of ALA reforms and package of Regulations. This final change to Arms Act established the Firearms Registry on 24 June 2023.

Shooting Clubs		
Title	Number	Correct context
Current number of Pistol Clubs registered	93	89 Pistol NZ Affiliated Clubs 4 Non-Affiliated Pistol Clubs
Pistol clubs under compliance (improvement notices or otherwise)	1	s.9(2)(a) OIA – with support of PNZ for noncompliance reporting. Now been issued a suspension pending cancellation
Pistol Clubs recertified and operating	92	Excluding above
Existing non-pistol Shooting Clubs (small bore etc)	300	278 of these clubs have been approved. 22 awaiting either payment or receipt of documentation
Non-pistol Shooting Clubs under compliance (improvement notices or otherwise)	0	The regulation for the first reporting year concludes at the end of that clubs FY. This is not the Govt FY and clubs have until 5 months after the end of their FY year to report. The report comprises of their minutes of their AGM, changes of officers and reconciliation of ammunition sales if selling.
Shooting Ranges		
Title	Number	Correct context
Pistol ranges recertified and operating	89	TTP reissued all existing Pistol shooting ranges certificates, these existing certifications having previously been granted by PNZ under Police agreed oversight. This aligned the certificates to the 5 year certification period. From this point, regulatory inspections were undertaken of these ranges by TTP against the standard
Number of Shooting Range Operator Applications received (includes having multiple ranges within application i.e complex)	323	Does not include the existing 90 Pistol Shooting Ranges who in legislation were already operating (note discrepancy of 3 ranges relates to 3 pistol clubs not having ranges)
Number of Shooting Range Operator Applications processed (excluding pistol) since 1 July 2023	43	s.6(c) OIA There are 280 shooting range operator applications remaining that are yet to be certified, these are undergoing review. All have been triaged for priority. Within these, 809 ranges have been identified.
Current number of ranges certified	476	396 pistol ranges 80 non pistol