



The Muzzle Loaders' Association of Great Britain

The Governing Body for Muzzle Loading Shooting in the United Kingdom

President J.W.F. Harriman.-Vice Presidents: The Duchess of Argyll,

D.J. Penn, P.W.G. Helps, A.J. Overton

Established 1952

Home Office Approved

Rifle and Muzzle Loading Pistol Club No. CFP/10/1/7/4/1/2/1/2/3/512

Firearms Consultation
Home Office
Drugs and Firearms Licensing Unit
5th Floor Fry Building
2 Marsham Street
London
SW1P 4DF

Dear Sir/Madam,

Public Consultation on Firearms Licensing Fees

I am writing to you on behalf of the Muzzle Loaders' Association of Great Britain in response to the consultation document entitled 'Public consultation on firearms licensing fees' and dated January 2017.

The Muzzle Loaders' Association of Great Britain (MLAGB) was formed in 1952 and is the governing body for muzzle loading within the UK as well as being a member of both the British Shooting Sports Council and the Foundation for European Societies of Arms Collectors. Its objectives are to encourage an interest in muzzle loading firearms; to promote, regulate and safeguard their use; and to preserve their freedom of collection.

In addition, the MLAGB is a home office approved club, and many of its members are also members of local home office approved clubs all of which would be adversely affected by the proposed changes to the fees. Our comments on the areas that most directly affect our members are detailed below.

Increases to fees for Home Office approval

The proposals include an increase in the fees for home office approval from £84 to £1050 as well as very large fee increases for renewal and minor administrative changes. No detailed costings have been provided to support this increase: we understand that this has been requested but has not been forthcoming to date despite a freedom of information (FOI) request being made by the British Shooting Sports Council. The proposed increase would undoubtedly have a severe effect on many of the home office approved clubs to which our members belong, as well as to ourselves, and many smaller clubs might be forced to close.

Age Discrimination

Your consultation document states (page 11) that “the home office has given due consideration to the impact it will have on different groups”. We respectfully point out that shooting sports are one of very few where people of all ages can participate and compete on equal terms. Perhaps for this reason the demographic for shooting sports, while including representatives of all ages, tends towards those of more advanced years. For example, in the MLAGB, 61% of our members are over the age of 65. On this basis, there would seem to be a *prima facie* case for age discrimination were the proposed changes to be enacted in the manner contemplated, and the impact (i.e. club closures) were to be as we anticipate. We therefore ask that due consideration be given to this aspect, and that you provide us with the data on which your assessment was based.

Museum Firearms Licenses

The MLAGB includes historical study and the preservation of heritage within its remit, and many important collections are housed in museums for the public benefit. Most museums are funded at least in part by public money, and we believe that any increase to the fee charged for a Museum Firearms License (or a section 5 authority where required) should reflect the wider benefit that these establishments provide and should therefore be in line with inflation.

Increased Risk from Unlicensed Shooters

Your consultation document mentions ‘increased risk’ associated with unlicensed shooters (page 4). We are struggling to understand why you believe that such a risk exists when:

1. All probationary members of home office approved clubs are vetted by the police, presumably with the same rigor as that applied to firearm certificate holders, and
2. Probationary members receive one to one tuition during their probationary period and therefore have no unsupervised access to firearms.

We ask that you provide us with a copy of your risk assessment that led you to this conclusion so that we can respond directly on any areas of risk that you have highlighted during that study.

Trophy of War

We are concerned that there is a proposal to charge for a temporary authority to dispose of a ‘trophy of war’. Charging for such an authority where the person is simply seeking to dispose of such an artefact is likely to discourage them from doing so which seems to run contrary to the purpose of the firearms act, as well as being directly opposed to any stated desire to improve public safety. We ask that the imposition of such a charge be reconsidered.

Fees Working Group

When firearm certificate and shotgun certificate fees were last reviewed, a Fees Working Group was established that included representatives from the shooting community. The *modus operandum* of this group was to propose a fee structure based on a detailed review of direct and indirect costs as well as a study of best practice. As a direct consequence of the transparency and buy in that this involved, the changes recommended were universally accepted and the process is considered an example of good governance at work. We ask that consideration be given to the establishment of such a group to consider the proposals currently under review.

Summary

This letter details our response to the public consultation on firearms licensing fees and supports our formal response using the mechanism that you provide. Several areas of concern have been raised including:

1. The increase to fees for home office approval are disproportionate and are of considerable concern to our members. It is considered likely that club closures would result. No detailed cost breakdown has been provided to justify the proposed increase despite requests for this information.
2. There appears to be a *prima facie* case for age discrimination if the changes are implemented as proposed, and the impact is as we anticipate. We ask that we are provided with details of the age discrimination study on which your statement (page 11) is based.
3. We do not understand why you believe that there is increased risk – and therefore increased cost – from unlicensed shooters (page 4) for the reasons stated in the body of this letter. We ask that you provide us with details of the risk assessment on which your comments are based.

In addition, we ask that you consider setting up a Fees Working Group to review any proposed changes to the fees contemplated by your proposals as this strategy was extremely successful when firearm and shotgun certificate fees were reviewed recently. We would be grateful if you can acknowledge this letter.

Yours faithfully,

Jon Harper Smith
MLAGB Chairman
8th March 2017