Submission Name: Scottish Saltires Modern Pentathlon

12. Do you have any other comments on the impact of the proposals contained in the Bill relation to Scottish Government objectives?

As an organisation we feel that the Bill should aim for a light regulatory touch with minimum cost when it impacts on bona fide sport clubs such as Scottish Saltires Modern Pentathlon and Scottish Tetrathlon. This will help limit potential detrimental effects this Bill might have on the various Scottish Government objectives and initiatives in Scottish Sport such as: "Girls on the Move" (75% of our participants are girls) and "Giving Young People a Sporting Chance"
Name/Organisation:

1. **Air Weapons Licensing**

   You may respond to all the questions or only those you have a specific interest in. (Text boxes have no word limit, they will increase in size accordingly).

   **13. In what ways will the creation of an air weapons licensing system in Scotland contribute to preserving public order and safety, reducing crime and advancing public health policy?**

   We don’t think it will.

   Forcing young children to have to shoot at existing club premises where the number of shooters using airguns will increase dramatically if the bill is passed, will place them in a more heavily lead contaminated environment, this would be counter to public health policies.

   In addition our members are taught to be extremely safety conscious and look after their pistols responsibly as they are given training by Scottish Saltires MPC and Scottish PC Tetrathlon Range Officers. Scottish Saltires MPC and Scottish Tetrathlon work hand in hand in training at all levels. 90% of our members start the sport of Modern Pentathlon through Scottish Tetrathlon.

   **14. Is there sufficient provision, or sufficient capacity to provide, suitable numbers of air weapons clubs across all areas of Scotland for use by registered air weapons owners/users?**
There is not currently sufficient provision of air weapons clubs across all areas of Scotland. Many members of Scottish Saltires MPC are not in an area that can support a traditional club due to geography.

Members currently train with Scottish Saltires MPC and Scottish Tetrathlon in various locations and practice on private land without incurring the cost of being members of an Air Weapon Club. If the bill was passed and Scottish Saltires MPC and Scottish Tetrathlon (under the auspice of Pony Club) were to become an approved air weapon club which uses multiple premises across Scotland this would provide sufficient capacity. By virtue of Schedule 1 Exemption 1 Scottish Saltires MPC and Scottish Tetrathlon members would be able to train with Scottish Saltires MPC and Scottish Tetrathlon at various premises and on private land without requiring individual certificates. Schedule 1 Exemption 1 would need to be slightly amended to reflect this.

As many of our members are under 14 years of age Scottish Saltires MPC request that Schedule 1 Exemption 1 be amended to allow a parent/guardian/adult over 21 be allowed to supervise both training and competitions.

15. How will the air weapons licensing system affect those using air weapons for personal/recreational use?
If each of our members were to require an air weapons certificate it will add cost and bureaucracy to a sport/organisation which is well controlled and teaches young people responsibility and respect. If all our members were required to go through the time consuming and costly process of both obtaining a licence and joining an additional club, our members would be unlikely to take up the sport and may also choose to leave the sport.

If passed as is, members will not be able to repair their air weapons either at their own homes or during a competition without the presence of a registered firearms dealer. There are not sufficient firearms dealers to service this requirement and they will add additional cost to enter this sport. Scottish Saltires MPC has proved to be, along with Scottish Tetrathlon, the grass roots organisation for many young athletes who have gone on to become elite athletes in modern pentathlon.

We currently have 70 members regularly competing approx 75% are girls and 70% are under 14 years of age.

Many Scots have gone on to compete at elite level, representing GB and part of the World Class program. Currently competing are 2012 World Champion and 2012 Olympian Mhairi Spence who is from Farr near Inverness, Inverurie’s. Freyja Prentice, reserve athlete for London 2012, junior individual medal winner at World and European level. Joanna Muir from Castle Douglas spent time on top of the world junior ranking list this year. Aberdeen’s Eilidh Prise has won individual youth world and European medals and started 2014 on top of the youth world ranking. Maili McKenzie from Dumfries represented GB at junior world and European championships this year. Mhairi, Freyja, Jo and Eilidh are part of a group of 7 women on the GB world class program on Podium and Podium Potential which is clearly dominated by Scots women. They all started at grass roots level through Scottish Tetrathlon, moving onto Pentathlon as a result of the high standard of performance they showed in Scottish Tetrathlon.

Airgun shooting is a sport accessible to all ages and disabilities. Scottish Saltires MPC has members who have shown so much talent in the shooting phase of Pentathlon they have gone on to represent Scotland at International Junior shooting competitions. This bill will deter people starting recreationally due to the bureaucracy and so stop the development of competitive shooters at all levels.
16. How will the air weapons licensing system affect those aged 14 to 17 who use air weapons?

The majority of our members are under 17 and as such the air weapons licensing systems would have a huge effect on them. If however we were allowed to become an approved air weapon club and therefore exempt from individual licences this would work for our organisation.

Each person will require an air weapons certificate which will add cost and bureaucracy.

They will not be able to repair their weapons without a registered firearms dealer, again adding cost and time. In addition as they are 14-17 they will probably be unable to drive and therefore find it difficult to access a firearms dealer especially in the more remote areas of Scotland.

17. How will the air weapons licensing system affect those using air weapons for commercial/professional reasons (for example: for pest control; as part of the tourist/hunting season; as part of fairs, paintballing centre, entertainment sector etc.)?

18. How will the air weapons licensing system affect those using air weapons for competitive sporting purposes?
All competitors require a licence incurring cost and bureaucracy. This would require event and visitor permits. This would be totally untenable for our sport as we often have more than 20 visitors attending our competitions and training events which run monthly. Having tried and failed to get visitor permits to take across to Northern Ireland we know how difficult and impractical such a requirement is.

In 2013 the Irish Pentathlon team came over to Scotland to compete against Scottish Saltires. All competitors were youth’s and gained invaluable experience from competing at this level against another nation. The Scottish youths took a convincing win which gave the sport a boost and encouraged participation. This event would be impossible under the current proposals in this bill.

If Scottish Saltires MPC were to become an approved air weapons club as requested previously, according to our interpretation of Schedule 1 section 1b(i) we would not require an event or visitor licence which would allow us to continue to run our Schedule 1 section 1b(i) we would not require an event or visitor licence which would allow us to continue to run our competitions which are only open to and attended by our members.

19. Is it equitable for those applying for an air weapons certificate to pay a fee which cannot be refundable irrespective of whether a certificate is granted or not?

We do not agree that a fee should be payable for unsuccessful applications.

20. Will the air weapons licensing system have a positive or negative impact on other areas of the public sector in Scotland (eg. The work of local government, public agencies etc.)?

We think that the air weapons licensing system will have a negative effect on the public sector in Scotland. Given that the Firearms teams are already over stretched, resourcing this requirement for licensing of air weapons, clubs, permits will place unprecedented demand on already slim resources.
21. What, if any, might the unintended consequences of introducing an air weapons licensing system in Scotland be?

We believe that in making it difficult or costly to run our events (run, shoot, swim, fence and ride) people will choose not to put themselves through the difficulty of obtaining an air weapons certificate, a visitors permit or joining an additional club, nor to pay the additional costs we will need to charge at competitions to take account of the cost of obtaining event permits. This will mean that our grass roots organisation that currently has up to 70 children from 8-25 competing monthly will no longer exist. In the future we will not have the next generation of Modern Pentathlete or Air Pistol Olympians as they will have no foundation.

The risk of introducing a requirement for an airgun license may encourage applicants to go the full hog and apply for a shotgun/firearms certificate that will thereby increase the number of more high powered/more lethal weapon ownership.

22. Do you have any other comments to make on air weapons licensing aspects of the Bill?

We respect the bill and are keen to work with it. However as it is currently drafted it would be unworkable for us. If however Scottish Saltires MPC and Scottish Tetrathlon were to become an approved Air Weapons Club with multiple premises for training and competitions accross Scotland and allowing all our members and visitors to use air weapons without holding individual certificates, as detailed above, this would allow them to work within the bill and the continuation of our sport along with the added benefit of a pipeline of elite athletes into Modern Pentathlon and the sport of Air Pistol Shooting to follow in our footsteps.

Allow Scottish Saltires MPC to become an approved air weapons club.

Allow all members within Scottish Saltires MPC NOT to require an air weapons certificate, but that Scottish Saltires MPC will hold the air weapons certificate for all weapons used.

Allow Scottish Saltires MPC Qualified Range Officer to repair, transfer or sell air weapons.

Allow anyone visiting from England, Northern Ireland or Wales to be exempt from visitors permits.
Do not limit the size of visiting groups.