Thank you for responding to the Local Government and Regeneration Committee’s Call for Evidence on the Air Weapons and Licensing (Scotland) Bill. All submissions will be examined and considered as part of the Committee’s scrutiny of the Bill.

Please be aware that questions marked with an asterisk (*) require an answer before you can submit the form.

Follow the Local Government and Regeneration Committee’s Twitter feed - all Committee tweets on this Bill will have the hashtag #aw&lbill.

*1. Please supply your name and contact details:

Name: Graham Ellis
Organisation: Scottish Air Rifle and Pistol Association
Address 1: 
Address 2: 
City/Town: 
Postcode: 
Country: 
Email address (if no email leave blank): 
Phone Number: 
* 2. Please confirm that you have read and understood the Scottish Parliaments “Policy on the treatment of written evidence by subject and mandatory committees”:

☐ Yes

* 3 Please confirm whether you are content for your name to be published with your submission:

☐ Yes

☐ No

* 4. Which of the three categories below best describes your interest in the Bill (please tick only one)?

☐ Personal

☐ Professional

☐ Commercial

* 5. Do you wish your email to be added to the Committee’s distribution list for updates on progress of the Bill:

☐ Yes

☐ No
6. Invitations to give oral evidence to the Committee on the Bill will be based on the submissions received. If you wish your submission to be included amongst those considered for possible invitation to give oral evidence, please indicate here.

☑ Yes

☐ No

7. You may answer questions on the entire Bill, or on any part of the Bill. Please indicate which parts of the Bill you are responding to? (You may select as many options that apply).

☐ All of the Bill

☐ Equalities, climate change and other Scottish Government objectives

☑ Air Weapons

☐ General licensing issues

☐ Alcohol licensing

☐ Civic licensing – taxi/private hire car licensing

☐ Civic licensing – scrap metal dealers

☐ Civic licensing – theatre licensing

☐ Civic licensing – sexual entertainment venues
Name/Organisation: Scottish Air Rifle and Pistol

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 see no perceivable benefit in public order or public safety that would not be achieved by the diligent use of existing legislation, only law abiding citizens will apply for a licence, criminal users though very few will by their very nature continue to abuse air weapons without regard. The current control regimen has seen airgun incidents fall year on year (71% in 5 years) to a low of 171 for 2013. The vast majority of offences being minor with very few serious incidents where actual harm was caused.

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?
Currently only a minority of airgun users frequent clubs, most airguns are used in vermin control or private land target shooting, the club structure we have in place covers approximately but no more than 5% of all airgun owners. Clubs are currently run by volunteers, while we have initiatives to increase land availability working with public bodies and have established a framework to make it easier for clubs to get started we still depend greatly on the response from either the private or public land holder.

Many airgun users have individual permissions to shoot on private land on an ad hoc basis which works well for very small groups but land holders in general will have concerns over increased numbers that would be involved in the creation of formal “Clubs”

Other than disciplines run by the International Shooting Sports Federation such as those seen at Olympics or Commonwealth Games Airgun shooting tends to be an outdoor or field activity in general while there is some small infrastructure and access to a small number of shared, licenced indoor and Firearms ranges these are only beneficial for those to train in “ISSF” like disciplines what is greatly is required access to suitable forestry and lands suited to airgun “field” type shooting. A small club with a single Field Target course requires a minimum of 4 - 8 Acres with a suitable safe backdrop area as compared to an indoor range which requires a building of around 50M x 25M

15. How will the air weapons licensing system affect those using air weapons for personal/recreational use?

The implementation of legislation may drive many out of the sport entirely or more likely with the requirement to hold a licence many will choose to move to traditional full power firearms, There will be the additional financial burden from the licence and significant costs if they need to travel to a club to shoot as opposed to on their local premises, while there are a good number of clubs in the central belt out with that area it can be a two to three hour drive to access any club facilities sometimes further for Field Target clubs.

For those engaged in vermin / pest control the lack of access to practice on private ground outwith their vermin control area may impact their ability to sustain their skill levels.

In addition where it is currently sufficient to have approval to shoot over suitable lands granted by a land owner, indication is that further approval by the chief of police may be required removing access to safe shooting grounds, impacting the rural target shooter and domestic vermin control further increasing the burden on Firearms control officers to review such sites.
16. How will the air weapons licensing system affect those aged 14 to 17 who use air weapons?

SARPA have concern over the licencing of juniors, not in the fact that they have every right to shoot but by that in licencing individuals who are in effect minors may pass the message that responsibility lies solely with them rather than parents or responsible guardians who need to ensure that airguns are controlled and only used in safe responsible manner.

There are a great number of junior shooters who take part in air rifle target shooting as part out door activities such as Boys Brigade, Scouts, Air Training Corp, Cadets, this legislation should not get in the way of delivering safe and educational exposure to shooting as a sport.

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.)?

Scotland is renowned for its shooting heritage with many traditional "country sports" type hotels and outdoor pursuits venues providing airgun shooting as an visitor attraction and activity.

The implementation of this licence scheme may well see the removal of airgun shooting events from many of our rural tourist attractions, hotels and other event organisations directly impacting tourism and shooting sport venue revenues.

In addition it will put at jobs at risk for a great many who work delivering airgun shooting at these venues.

Many come to our nation to enjoy the outdoor activities and Airgun shooting is often the only practical and accessible form of shooting available.

Currently Pest Control can be either a professional or personal service, may farmers and land holders have a mutual agreement with airgun shooters and rely on individuals who they have built up a trust relationship with. Any professional pest control services offered from across the border would also require some form of long term licence solution or visitor permit to operate cross border.

18. How will the air weapons licensing system affect those using air weapons for competitive sporting purposes?
This licence scheme will directly impact the ability of competitors to access the sport from across borders and from other nations. Currently we have a common licence scheme across the UK and our events are accessible to many nations, this legislation could make Scotland a shooting backwater unable to hold major international events, Competitors will travel to less officious countries with less red tape to be deal with.

On top of ISSF, national, commonwealth events there are many other airgun shooting events such as Field Target, Hunter Field Target, Bench rest, Iron Plate etc. etc. many of which see competitors traveling from abroad. Most of these sports are practiced in the outdoor natural arena.

On the domestic front the impact may be minimal depending on the application of the legislation, many clubs operate with private land holders to deliver competition grounds, as well as other events which take place in conjunction with country fairs and public events, if each “site” or event is required to be licenced, public involvement and competition will become a thing of the past with competition being restricted to far fewer “Approved” sites.

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?

This position is NOT equitable, currently individuals may own air guns for many reasons all perfectly legal and law abiding, should any application from such an individual be declined no charge should be leveraged against them legally or financially.

Many individuals hold equipment to the value of thousands of pounds, if forced to surrender or sell that equipment given the potential negative impact on airgun values from a flood of equipment hitting the market not only should there be no charge but there should be a compensation system to address the financial lost being imposed through no fault of their own.

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.)?
There is the potential for a huge negative impact on the public sector in the loss of man hours spent on what is essentially a non-issue, the current firearms control structure is barely able to meet the need of the 70,000 current firearms owners, adding around 50,000 air weapon licences and potential home / site visits for any deemed as requiring further attention will impact the public purse to a far greater level than is currently stated in the Financial impact study.

21. What, if any, might the unintended consequences of introducing an air weapons licensing system in Scotland be?

This bill may cause a large migration of shooters from air guns to firearms straining further both Firearms control structure and the supporting club structures.

We can also see large number of airguns dumped on the grey market or thrown in skips where children or irresponsible individuals could access them and create a far greater public risk.

Legislation may also cause the criminalisation of any who may hold an airgun who may not apply for a licence in appropriate time or though not knowing they are accountable for them in the case of guns airguns held for youths or held in storage..

It may also cause significant damage to a growing sport at the grass roots level from which the likes of Sian Bruce, Caroline Brownlie, David Owen and Jen McIntosh Scotland’s most decorated Olympian and others stemmed from.

By the introduction of new offences created by this bill crime statistics will inevitably increase as people fall foul of any new regulation, the unfortunate fact is that it will not create any further public safety benefit and may through uncontrolled “dumped” air weapons put them in the very hands of those who would misuse them either through ignorance or deliberate act.

22. Do you have any other comments to make on air weapons licensing aspects of the Bill?
Currently there is no issue with airgun users, the fact is that as a member of the public you are at far greater risk of injury from dogs, golfers, cyclists or attending football, we see no benefit to this legislation as proposed.

We can see that regardless of the very positive input and constructive discussions held between the SFCP and invited bodies the content of those discussions have been largely ignored.

Should a licence be introduced which we believe it will be a large and ineffective waste of public resource, any scheme needs to be proportionate, fairer and far lighter than the current proposal, which as it stands exceeds the requirements for Shotgun ownership.

This proposal has no majority support from ether the shooting fraternity or the general public,. A fact demonstrated by both the petition of 20,600 against the bill and the 87% or respondents to the Consultation process who rejected the need for change.

We still support the position that no further regulation is required other than the application of existing laws.

In relation to the bill there remains the option to ether remove this proposal from the bill entirely or put a proportionate and responsible system in place.

RFD’s are already obliged to register anyone buying a new airgun under existing legislation something airgun buyers have lived with for almost a decade, expansion of this to facilitate self registration through an online system with an automated PNC check would cost far less, engage with a wider audience delivering the sort of data that may help the Airgun retailers and police identify legitimate airgun users freeing police time to focus on the criminal element who given their nature would not register.

The underlying causes of airgun use will not be addressed by further legislation, what could drive the statistics down even further would be a public education program ensuring shooters, parental guardians and the public at large are informed on the facts and obligations under the laws we have today.