



NATIONAL RIFLE ASSOCIATION

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Home Office Consultation – “Offensive Weapons”

Thank you for your recent clarification on Home Office proposals to prohibit two types of firearms (.50 calibre and VZ58 MARS) which included the following details:-

- (1) The .50 calibre proposals have been extended to include “other similar high power, long range rifles”; furthermore in an attempt to differentiate between ‘anti-materiel’ type firearms and those used for sporting purposes the Home Office is contemplating imposing a 10,000ft lbs muzzle energy limit.
- (2) The VZ58 MARS proposals have been extended to include any “rapid firing rifles” that “employs a Manually Actuated Release System capable of achieving a similar rate of fire”; your proposals do not extend to self-loading rifles chambered for .22 rimfire cartridges. The Home Office has not provided a definitive description of Manually Actuated Release System so it is not clear precisely which rifles are at risk of prohibition.

These clarifications fundamentally change the terms of the Public Consultation which clearly stated the Government proposals were to solely prohibit the ownership of:-

- (1) “.50 calibre ‘materiel destruction’ rifles of a type developed for use by the military to allow for shooting over long distances for example, to enable sniping at long ranges and in a manner capable of damaging vehicles and other equipment (referred to in military terms as ‘materiel’) “
- and
- (2) “rapid firing rifles, such as the VZ 58 Manually Actuated Release System (MARS) rifle...because a second pull of the trigger is required to discharge a round”.

The current wording of the Consultation and Impact Assessment could be seen as an attempt to mislead the public; furthermore they have been presented without any credible supporting evidence of threat to public safety. This is a direct consequence of launching such proposals without prior engagement with shooting organisations;

We believe these changes to the scope of firearms proposals means that Consultation is fundamentally flawed and should be abandoned or re-issued as a separate document, with full details of what is proposed and an accurate re-working of the Impact Assessment.

Furthermore:-

- (1) The Consultation provides no evidence linking the firearms recommended for prohibition to crime or any particular threat to public safety. The House of Commons Briefing Paper (CBP 7654 2 Aug 2017) reports rifles consistently represent a nominal 1% of all recorded non-air firearms offences. Handguns, banned from civilian ownership since 1997, are by far the most common type of firearm used in crime and represented 42% of non-air firearm offences in 2016/17.

It is illogical for the Consultation to propose prohibition of any rifles when the Government's own analysis proves they are the last firearm of choice for those with illegal intent. Scarce police and government resources should surely be targeted to activities that yield the maximum public benefit; no evidence has been produced that show .50 calibre and MARS rifles are deserving of special prohibition.

- (2) The Consultation makes an erroneous reference to .50 calibre being a weapon of materiel destruction. "Materiel destruction" depends on ammunition types (armour piercing and explosive) that are prohibited from civilian use. Current firearms legislation effectively prohibits combination of firearms and ammunition that together have "materiel destruction" capability; for example we understand HMS Belfast moored on the Thames in London has operational 4" guns that are covered by a museum firearms licence and more than capable of "materiel destruction" if prohibited live naval artillery rounds were available.
- (3) The Consultation makes reference to the particular threat that .50 calibre rifles pose to security personnel wearing body armour. Again this is misleading; most UK police officers are issued with Stab Resistant vests designed to protect against rigid pointed objects with applied energies up to 65J, far less than the muzzle energy of even a small bore rifle.
- (4) The Impact Assessment makes no reference to the needs of disabled shooters and the negative consequences of prohibiting MARS type rifles to those with limited limb functionality. This is a significant omission as MARS rifles are suitable for disabled and elderly shooters. To illustrate this I recently received the following message from a concerned NRA member:-

"This disability has had a profound effect on my life. It has cut me off and isolated me from my old life. So four years ago I joined my local shooting club, partly to give me a reason to get out of the house and mix with others, but also to reconnect with a sport I had competed in at school. I was blessed in that my local club is a very encouraging and enthusiastic place, covering many shooting disciplines.

Once I'd gained my firearms certificate, a year after joining the club; I decided to look for my first fullbore rifle. It became clear through discussion with senior club members that the MARS action rifle would be ideal for me given my disability. My parents, realising the positive effect target shooting was having on me, purchased a .223 calibre rifle for me.

That was over two years ago and to this day, it remains my only fullbore rifle, which I shoot as often as my disability allows me. It's a pleasure to use and allows me to shoot without breaking my grip, something that would be impossible for me to do with off hand shooting, even seated off hand shooting and very difficult for me when bench rest shooting.

The MARS action is a mechanism I use to allow me to accurately shoot a rifle at target. Like the walking stick I use in busy places or the stool I sit on in my shower, it plays an all important part in allowing me to carry on doing things I need and/or want to do. I would really like to be able to carry on using my MARS action rifle. I would not stop shooting, I would just stop fullbore shooting and going to Bisley. I think that would not only be a great shame, but also unfair. I am practical and pragmatic in my response to my disability. The MARS action rifle is my response to that approach and works very well for me.”

- (5) The Impact Assessment significantly underestimates both the number and value of rifles that would be affected. We estimate 150 (.50 calibre) and around 1,000 (MARS) rifles would be affected; the figure for MARS would rise exponentially should the description of “rapid fire” be loosely worded. In value terms the average loss of surrendering a .50 calibre to the owner is in excess of £10,000 and £4,000 for a MARS rifle.
- (6) “Rapid fire” as determinant for prohibition defies logic. In practical terms rapid fire depends on firearm functionality and competence of the shooter.
- (7) To threaten public safety a person with evil or dishonest intent needs access to the firearm, access to suitable ammunition, and competence in their use. It is difficult to comprehend a less suitable firearm to use to threaten public safety than a .50 calibre rifle that is heavy, unwieldy, difficult to conceal and almost impossible to practice with unnoticed.

Finally I can confirm our willingness to meet and discuss any proposal or initiative that is based upon the noble intention of improving public safety; there have been good examples in the past where early dialogue with shooting organisations have helped shaped Home Office proposals. We will at times disagree but share common ground in wanting to preserve the rights of the law-abiding shooting community and protect the public from those with evil or dishonest intent.

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