



22 July 2024

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Pistol New Zealand

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Dear [REDACTED]

The questions about inspections and certification of pistol clubs in the June 2024 issue of *Bullshooter* are timely. This letter provides a response for your members and readers.

Here at the Firearms Safety Authority - Te Tari Pūreke we know the issue of clubs and ranges is a hot topic. There is scrutiny from the news media, government, councils and community groups who want assurances about the oversight of facilities under the new legislation.

And that is the whole point. The legislation is new, and the Authority is also new, officially taking over from Police as the Arms Act regulator only very recently. Our systems and operations are evolving and the approach we take with clubs and ranges in the first few years will further develop and likely look very different in five or ten years.

We have been working alongside clubs and ranges and their representatives for more than three years. It started with a meeting with Pistol NZ range inspectors in Palmerston North in May 2021 where we collectively agreed the way forward under the forthcoming regulations.

We started from the shared belief that clubs and ranges play a valuable role in our communities, if they are well managed and meet safety regulations set by Parliament.

Both the Firearms Safety Authority and Pistol NZ range specialists knew we had a big job to do. Between us we reviewed 412 pistol ranges, both independent sites and those affiliated to PNZ. We jointly agreed to streamline the approach, so the better ranges got less attention and those that needed improvements were identified for closer oversight.

Based on PNZ certification and its inspection data at the time, 309 ranges were accepted as compliant. The remaining 103 pistol ranges were identified as needing additional oversight. However, once our physical inspections got underway, it became obvious that some of the initial group of 309 ranges that PNZ believed were up to standard were not actually compliant. The Firearms Safety Authority discussed these problems directly with PNZ and shared details of the range failures we were uncovering.

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Examples of the failures included non-compliance with the ranges' own standing orders and issues with ballistic safety, design, and construction. We issued Improvement Notices as we became aware of safety problems and were clear about the timeframes to make the improvements. This is why some clubs and ranges received follow-up inspections. We are pleased to report that most of the problems in the Improvement Notices were cleared up pretty quickly by the range operators, who could provide photographic evidence of remediation works. This meant we did not need to carry out follow up inspections.

If there is any confusion about Improvement Notices, we can set the record straight. An Improvement Notice is both a record of the visit by the Authority and of the need to fix a problem. This written record benefits both the range operator and the Authority. It means there is less likelihood that discussions or emails get misinterpreted, or that essential repairs are overlooked.

We've heard questions as to why separate Improvement Notices are issued for each fault, rather than problems grouped together in a single Notice. Other questions ask whether it is some kind of exercise to inflate numbers. This is absolutely not the case. The reason for separate Improvement Notices is because the time frame to fix the problem is linked explicitly to each fault. If there was a bulk notice to cover all non-compliant issues, the range would not receive clearance until the last fault was fixed. Individual notices also help range operators, Pistol NZ and the Authority to keep track of any trends and share insights as to what's happening across the country.

It is important to place on record that the Authority was pleased to find a significant number of ranges that are fit for purpose and needed no remediation work. There are plenty of examples of pistol ranges with all the right forms, signage, good maintenance and a demonstrated commitment to safety. They can be justifiably proud of their record.

Other ranges will continue to receive inspections. We will keep supporting them to improve. Like every government agency we have limited resources and want to invest effort where it is most needed. Over time we may move to a system where inspections are based on indicators like past visits, whether it is an isolated or heavily populated setting, if there is dynamic shooting or certain calibres are used, or the maintenance record.

The Authority's Clubs and Ranges team has worked closely with operators to avoid closing sites where Improvement Notices have been issued for ballistic safety issues. Ranges get a genuine opportunity to fix them, and, in all cases, we have found workable solutions. No pistol ranges have been closed following remedial work to address failures.

All ranges have been issued a new Police Range Certificate and members are continuing to shoot, without the need for further applications.

We recognise that maintenance costs and keeping to standards required by both Pistol NZ and the Police Shooting Range Manual can be difficult. Some ranges have declining

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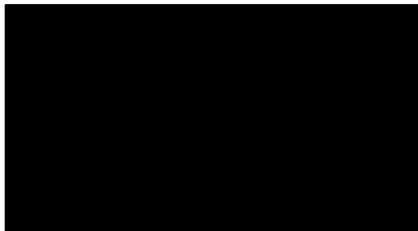
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membership and resources and will face tough but unavoidable decisions about how to keep their members safe and their neighbours safe.

The Firearms Safety Authority has only just completed the first full year of the new system. Our approach to inspections and certification will continue to evolve. We have built a good understanding of which ranges need further oversight and which don't. We will keep moderating our approach as we work through inspection processes.

It has been hard work for all of us, but we have the same goal of ensuring safety for range users and neighbouring communities. We are also committed to keeping open the lines of communication with the Pistol NZ executive and individual clubs.

Yours sincerely



Inspector Peter (PGR) Baird
Manager, Compliance Services
Firearms Safety Authority – Te Tari Pūreke

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