

20 February 2026

IR-01-25-46056

s 9(2)(a) OIA Privacy

Tēnā koe s 9(2)(a) OIA

Thank you for your Official Information Act 1982 (OIA) request dated 17 December 2025 Month 2025. I have answered each of your questions below:

In response to IR-01-25-40428, the attached documents referred to the conversion of a prohibited firearm to a non-prohibited firearm being a activating circumstance in the registry when first came into effect.

1. *Can FSA/Police explain the expansion and contraction of the modification of prohibited firearm to non-prohibited firearm pipeline between the creation of that document where it was said to be an activating circumstance, to defacto ban on modification, to the current lifting of the ban for solely non-semi automatic tubular magazine fed rimfire firearms. Historically, what types of firearms were able to be converted, and what was the reason that there was more or less a ban on modifying prohibited firearms into non-prohibited states, and then the rollback of that ban for some rimfire only.*

During the buy-back and amnesty period, certain prohibited firearms with tubular magazines and prohibited tubular magazines could be modified at taxpayer expense and then lawfully retained. Those items were specified in the then regulations 28U of the Arms Regulations 1992 (added to the regulations on 21 June 2019 and revoked on 31 December 2020) and regulation 28UA, (added on 29 November 2019 and revoked on 31 December 2020). The ability to take up this option was well publicised at the time, and it was expected that those who wanted to avail themselves of this option would have done so during this period.

The June 2023 amendments to the Arms Regulations 1992 included a requirement to update the registry when a licence holder modified a prohibited firearm to be non-prohibited, providing certification from a person authorised by Police that the modification had been properly carried out (Schedule 1B, Part 5). This made it clear that a person lawfully in possession of that prohibited firearm, by virtue of having the required endorsement and permit who purported to modify the firearm to be non-prohibited would need to advise Police and any such modification needed to be properly certified. Such modifications were accordingly specifically captured in the Arms Regulations 1992 so that there was no doubt that they needed to be recorded by the registry. Police had observed after the April 2019 law changes that many owners of former military style semi-automatic firearms who were directly followed up about the buyback claimed to have unilaterally

modified their firearm to sporting configuration at some prior point in time. This meant that its movements no longer needed to be tracked by permit.

The current policy expressly sets out a more standardised (rather than case by case) process for modification of large capacity non detachable tubular magazines of .22 rimfire firearms. The policy is limited to .22 or lower configured as lever, bolt and pump action firearms. It was developed to address an emerging pattern of owners of such items attempting to do the right thing and register them, not having realised that the large capacity non-detachable tubular magazine was a prohibited magazine. Such firearms themselves are not prohibited firearms if not for the magazine. This policy allows the licence holder to seek modification of the prohibited magazine by a licensed dealer gunsmith who will complete a declaration that the work modifying the tubular magazine is now compliant and permanent. Only once the declaration is received by Te Tari Pūreke can the licence holder's firearm be changed to 'non-prohibited' in the Registry.

2. Could you include primary source documents/emails/policy briefs detailing the reasons and evidence for each iteration of the modification policy from the inception of the register to today.

Please refer to the attached emails and documents that have been identified as within scope of your request. For emails that reference attachments, we have included the attachments immediately following the email. We have interpreted your request as seeking the primary documents relating to the development of this policy and therefore have not included administrative email exchanges or documents as the attached documents show the rationale and conclusion of the changes made.

Some information has been withheld under the following sections of the OIA:

- 9(2)(a), to protect the privacy of natural persons, including that of deceased natural persons.
- 9(2)(h), on the basis that it is necessary to maintain legal professional privilege.

Emails containing legal advice, analyses, and recommendations are subject to legal professional privilege, and therefore have been withheld in full under section 9(2)(h) of the OIA, to maintain legal professional privilege.

Police consider the interests requiring protection by withholding the information are not outweighed by any public interest in release of the information.

You have the right to ask the Ombudsman to review this decision if you are not satisfied with the response to your request. Information about how to make a complaint is available at: www.ombudsman.parliament.nz.

For your information, Police has developed a process for proactive release of information, so the anonymised response to your request may be publicly released on the New Zealand Police website.

Nāku noa, nā



Laura Searancke
Director Regulatory Compliance and Investigations
Firearms Safety Authority

Modification of Prohibited Firearms

I'd like to provide clarification on an interim decision on the modification of prohibited firearms.

As you may be aware, certain firearms and magazines were made prohibited in the law changes of 2019 and 2020.

The definition of a prohibited item is included here:

- [2A Meaning of prohibited firearm](#) (for prohibited firearms)
- [2B Meaning of prohibited magazine](#) (for prohibited magazines)

Impact of Registry Regulations

The Arms Regulations for the Registry were updated in June 2023 to include information about modifying a prohibited firearm to be non-prohibited. This became an activating circumstance and 'event' which has to be recorded in the Registry.

The details of the firearm before and after modification, and a certification from a person authorised by Te Tari Pūreke must be provided to show that the modification has been properly carried out and shows that the firearm is permanently modified.

The process is premised on the assumption that (usually) the person notifying Police that they have modified a prohibited firearm to non-prohibited, would have **lawfully possessed** that prohibited firearm in the first place by having the required endorsement and permit.

Modification to a lawfully held prohibited weapon would need to be inline with what we allowed in the Buyback. Any modification that a licence holder wants completed is to be done at their expense.

These types of firearm that were allowed to be modified in the Buyback:

- non-detachable tubular magazines on semi-auto or pump action shotguns,
- .22 lower rimfire semi-automatic firearms, and
- other firearms that aren't prohibited in themselves (i.e. lever action, pump action) but that had non-detachable tubular magazines where the magazine capacity was greater than 10 rounds.

No centrefire semi-automatic rifles were allowed to be modified.

See link here for more detail:

<https://www.legislation.govt.nz/regulation/public/1992/0346/40.0/LMS216072.html>

This Buy back law was later revoked (as it had only been a temporary measure) and up until June 2023 there was no explicit legal option to modify any prohibited firearms.

There shouldn't be any modifications outside of the law and policy.

Our current direction for staff is that **unless the licence holder has the required endorsement and permit to hold or obtain the prohibited item, no modifications should be allowed, and the prohibited item should be surrendered.**

This means that the only time a modification would be allowed is if it is lawfully possessed and the licence holder has an endorsement and permit already. They could modify, and it would only apply to prohibited items that were allowed to be modified, in line with the Buyback. (See the list of specific firearms above).

We are working on establishing a list of approved Gunsmiths who may provide certification that the modification has been properly carried out. We will deal with each situation as they arise.

If you come across this situation, you should raise this with your manager in the first instance.

Lachlan Marshall
Regulatory Service Improvement Manager



Prohibited firearms that are held unlawfully by licence holders without a prohibited endorsement and/or PTP, who are entering them into the Registry

Date	6 October 2023
To	Superintendent Richard Wilson – Director Operations
From	Jessica Barrett – Operational Policy Lead
Prepared by	Hamish Brodie – Operational Policy Advisor

Purpose

1. This memo has been prepared to advise that Te Tari Pūreke are becoming aware of licence holders, who do not hold a prohibited endorsement and/or PTP, entering prohibited firearms into the Registry.
2. It has also been prepared to highlight the key considerations for us to consider as a regulator and to provide the advice that was sought from PNHQ Legal.

Background

3. Following the Registry go-live, licence holders who do not hold a prohibited endorsement and/or PTP and are in unlawful possession of prohibited firearms have engaged with the Registry.
4. To date, prohibited firearms being registered without the required endorsement and/or PTP is low (see **Appendix Three**).
5. Legal advice has been sought about our approach to this situation and about modification of prohibited firearms to non-prohibited– the Legal advice is available at **Appendix Four**.
6. Included in the Registry Regulation are provisions (see **Appendix One**) that allow modification of prohibited firearms to non-prohibited firearms. This regulation relates **only** to those in **lawful** possession of prohibited firearms.
7. Some licence holders in unlawful possession of prohibited firearms are taking this registry regulation to mean they can have their prohibited firearm modified. This is not the intent of that Registry regulation.
8. Legal advice received (see **Appendix Four**) **s 9(2)(h) OIA**



Our recommended approach

9. Any instance of unlawful possession of a prohibited firearm is a serious offence.
10. We recommend requiring the licence holder to surrender the firearm to Police in all instances.
11. If the licence holder does not surrender voluntarily, the licence holder should be referred to the compliance process, with our response escalating to warnings, suspensions and/or to frontline Police to seize the firearm.
12. If the licence holder voluntarily surrenders the firearm, there will be no compensation and it is recommended that the licence holder is dealt with by way of education (i.e. no warnings or suspensions unless other issues are identified).
13. This paper does not recommend allowing modifications of any kind (even for the .22 lever action rifles with non-detachable tubular magazines which were made prohibited due to their magazine capacity), or approving any retrospective PTPs.



14. Our staff, however, should be prepared for the instance that a licence holder asks if they can modify their prohibited firearm or now obtain a PTP, which is why a clear and consistent approach to this issue is important.

Considerations

15. Licence holders are wanting to do the right thing by entering the firearm into the Registry and we need to consider this differently as a regulator in comparison to licence holders who we find in unlawful possession of a prohibited firearm by other means (security checks, Police interactions, search warrants etc).
16. Our approach needs to reflect that we want to keep encouraging people to do the right thing by the Registry and their obligations.
17. We have an opportunity to emphasise the voluntary surrender provisions that presently exist in the Act, and this could see an increase in the surrender of prohibited firearms or other arms items.
18. We can follow our regulatory approach that allows for education, engagement, encouragement before enforcement is considered (seizure, revocation etc) and further enhance understanding with the firearms community of our regulatory approach.
19. The recommended approach will help remove unlawfully held prohibited firearms from circulation and will be consistent with our compliance approach to date.
20. On the other hand, some licence holders may become aware of our approach and may then be unwilling or scared to engage with the Registry or Te Tari Pūreke when they realise they hold a firearm unlawfully.

Recommendations

21. It is recommended that you:

- **Note** the Legal advice received.
- **Endorse** the approach that the position for prohibited firearms in unlawful possession of a licence holder is that they should be surrendered to Police and that compliance intervention will depend on the circumstances and outcomes.
- **Endorse** the position that no modifications will be allowed for any kind of prohibited firearm and that no retrospective PTPs will be issued.
- **Note** that further work may be required to operationalise and implement the approach.

Stakeholders

- Jessica Barrett – Operational Policy Lead
- Hamish Brodie – Operational Policy Advisor
- Dean Smith – Operational Integration Manager
- Joanna Bond – Legal Advisor
- Steve Crawford – Deputy Compliance and Resolutions Manager
- Ewan Kelsall – Partnerships Manager
- Jason Greenhalgh – Manager Regulatory Services
- Lachlan Marshall – Regulatory Service Improvement Manager



I approve the recommended approaches and approve any further work to be undertaken so the process can be implemented and/or communicated to the business.

Comments:

Signature _____

Date _____

Richard Wilson
Superintendent
Director Operations
Te Tari Pūreke – Firearms Safety Authority



Appendix One

Modifications provisions included in the Registry Regulations

Schedule 1B, Part 4.

8	Modification of a prohibited firearm to a non-prohibited firearm	Details of the firearm before and after modification, and a certification from a person authorised by the Police that the modification has been properly carried out and the firearm is permanently modified.
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Schedule 1B, Part 5

6	Manufacture, modification, or destruction of an arms item	Within 5 days after the date of manufacture, modification, or destruction.
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Modifications Regulations from 2019 Firearms Amnesty and Buyback

28U Converting prohibited item to non-prohibited item before end of amnesty period

(1) This regulation applies to the following firearms:

- (a) a semi-automatic shotgun (not being a pistol) or a pump-action shotgun that—
 - (i) has a non-detachable tubular magazine or magazines that are capable of holding more than 5 cartridges commensurate with that shotgun's chamber size; and
 - (ii) is able to be permanently modified so that the magazine or magazines are no longer capable of holding more than 5 cartridges commensurate with the shotgun's chamber size; and
- (b) a semi-automatic firearm (not being a pistol) that—
 - (i) is capable of firing only 0.22 calibre or lower rimfire cartridges; and
 - (ii) has a non-detachable tubular magazine that is capable of holding more than 10 cartridges; and
 - (iii) is able to be permanently modified so that the magazine is no longer capable of holding more than 10 cartridges; and
- (c) a firearm (not being a prohibited firearm) that has a non-detachable tubular magazine that—
 - (i) is a prohibited magazine; and
 - (ii) is able to be permanently modified so that the magazine is no longer a prohibited magazine.

(2) A person who, before 12 April 2019, lawfully possessed a firearm to which this regulation applies may, instead of applying for compensation in respect of the firearm under regulation 28L or 28P, arrange with an approved gunsmith before the end of the amnesty period to have the firearm and its non-detachable magazine or magazines safely and permanently modified to convert the firearm and magazine or magazines to non-prohibited items.



Appendix Two

Voluntary Surrender

59A Surrender by licensed dealer of firearms, etc

(1) A licensed dealer does not contravene section 10 if, on obtaining possession of any of the following items from any person, the licensed dealer surrenders the item within 5 working days to the nearest Police station for inspection and inquiries:

- (a) a pistol:
- (b) a pistol carbine conversion kit:
- (c) a restricted weapon:
- (d) a prohibited item.

(2) A licensed dealer does not contravene section 12 if the licensed dealer does not record the particulars of any of the following items that is received by that dealer and, within 5 working days, surrenders the item to the nearest Police station for inspection and inquiries:

- (a) a firearm:
- (b) an airgun:
- (c) a pistol:
- (d) a pistol carbine conversion kit:
- (e) a prohibited item:
- (f) a restricted weapon.

59B Voluntary delivery to Police of firearms, etc

(1) If any arms item or ammunition is delivered to the Police by a person who is not authorised to be in possession of the item or ammunition, it is affirmed that the Police have the discretion not to prosecute in any case where—

- (a) the offence is considered to be one of possession only; and
- (b) there is no public interest in proceeding with the prosecution.

(2) See also Parts 1 and 2 of Schedule 1 (which contain amnesty provisions).



Appendix Three

List of prohibited firearms registered so far and analysis of these by Legal

1. Norinco SKS Semi-Automatic Centrefire Rifle – s 9(2)(h) OIA [redacted]
2. Stevens 86C Bolt-Action rifle and a Stevens tubular magazine – s 9(2)(h) OIA [redacted]
3. Winchester 250, .22lr Lever Action – s 9(2)(h) OIA [redacted]
4. Remington 7615 .223 s 9(2)(h) OIA [redacted]
5. BSA .22 Bolt action and tubular 15 round magazine s 9(2)(h) OIA [redacted]
6. Winchester 150 .22 Lever action - s 9(2)(h) OIA [redacted]
7. Escort Semi Auto Shotgun 7 round – s 9(2)(h) OIA [redacted]
8. Marlin .22 Lever action tube mag (discovered outside registry) s 9(2)(h) OIA [redacted]
9. Troy Defense - Troy Sporting Rifle. Pump Action – s 9(2)(h) OIA [redacted]
10. Winchester 270 Pump Action .22 - 15 Round Mag – s 9(2)(h) OIA [redacted]
11. Remington 512 Sportsmaster .22 Bolt - 15 round mag - s 9(2)(h) OIA [redacted]
12. MARLIN Bolt Action .22WMR 15 shot tube mag - s 9(2)(h) OIA [redacted]



Appendix Four

s 9(2)(h) OIA



s 9(2)(h) OIA



s 9(2)(h) OIA



Te Tari Pūreke

Firearms Safety Authority

s 9(2)(h) OIA



Te Tari Pūreke
Firearms Safety Authority

s 9(2)(h) OIA

From: [BODDY, Matthew \(Matt\)](#)
To: [BAIRD, Peter](#)
Cc: [GREENHALGH, Jason](#); [WILSON, Richard \(RJ\)](#)
Subject: RE: Other Event – A-cat Process for Compliance to escalate to other TTP workgroups (district) and/or district constabulary staff
Date: Monday, 3 March 2025 9:07:59 am
Attachments: [image001.png](#)

Hi Pete,

Just had a read of the below and thank you for engaging the RM's. Having been pulled into one of these events myself last week, I fully appreciate the complexities that some bring.

I terms of the part that you and I have been speaking of, nothing will be progressed on that for a while, due to competing priorities. In the meantime, our FSA teams should be using WLM for the tasking of events and tasks. For matters going to NZP that require deployment, then we should replicate our existing channel of formal comms (as per Resolution pathways). If the matter requires something less i.e. a conversation with Intel etc..., then the local FSA team should be still using WLM and making good notes in NIA to ensure they do not lose visibility of the event itself.

Thanks,

Matt

Matthew Boddy
Director, Operations (acting)
M [s 9\(2\)\(a\) OIA](#)
E matthew.boddy@police.govt.nz
[SEEMail]



I am e-mailing at a time that is convenient for me.

Please do not feel obliged to reply if this is outside of your normal working hours.

From: BAIRD, Peter <Peter.Baird@police.govt.nz>
Sent: Monday, March 3, 2025 8:48 AM
To: FIELD, Stephen (Steve) <Stephen.Field@police.govt.nz>; NORRISS, Lyle (Lylee) <Lyle.Norriss@police.govt.nz>; ANDREWS, Karen <Karen.Andrews@police.govt.nz>; GENNILLS, Lauren <Lauren.Gennills@police.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>
Cc: BODDY, Matthew (Matt) <Matthew.Boddy@police.govt.nz>; GREENHALGH, Jason <Jason.Greenhalgh@Police.Govt.NZ>; CRAWFORD, Steven (Steve) <Steven.Crawford@police.govt.nz>
Subject: Other Event – A-cat Process for Compliance to escalate to other TTP workgroups (district) and/or district constabulary staff

Regional Managers

As discussed at one of our recent meetings, the management of events into District (Police or TTP) is unresolved and irregular. There is a piece of work with Matt Boddy on tasking models and consistency. The matter below is as a result of the new increasing work load on the National Compliance Team with 'Other Event – A-cat' and requires a collective intervention if Compliance is to provide a consistent process and service to Districts and the regulated. While the event tasking model is pending, the significant increase 'Other Event – A-cat' events created through previously unidentified firearms (post buyback and unpermitted firearms (unable to find the permit) in the previous Police District firearm model) is creating this unforeseen additional work stream for Compliance. The impact on Compliance is a significant against our existing work stream and FTE loadings.

Now that the consequence of this work is more fully understood, and that through this understanding and triaged activity by both Compliance and the Registry, the remnants on the unresolved being sent to Compliance are significant and complex.

Context

You may already be aware that since November last year our Endorsement Team has been receiving a significant number of events from the registry 'Other Event – A-cat' events. The registry create these events when a firearms license holder enters into the registry a firearm which is actually a prohibited firearm, or a firearm with non-detachable prohibited magazine or there are issues with permits for the firearms that have been entered.

This new workstream arrived with little knowledge as to the complexity and is now requiring a commitment of three FTE's (we are currently holding 160 events) to resolve these. The registry do make initial inquiries to resolve but after 7days, the event is assigned to the Compliance Endorsement Team.

Where a LH registers a prohibited firearm/magazine and it "flags up", it requires Compliance to ascertain if it is actually prohibited first by internal inquiry or by contact with the LH and depending on the outcomes of that inquiry there are several scenario's to resolve i.e. Amendment in AIS (not prohibited) or surrender(prohibited).

Compliance may have the ability to resolve the events through the issuing of a permit if the LH has an appropriate endorsement permits the item to (per attached policy). Where the event resolution requires the surrendering of the prohibited items, the validation of magazine capacity or an audit of permit items, our Compliance Team endeavours to take the event through to completion. We may require additional tasks to be completed by either district firearms staff or district constabulary staff to assist.

Compliance has no ability to conduct inquiries ourselves, nor facilitate the uplifting of firearms, arrange magazine capacity validation, audit collections for permit clarification etc.

We are still trying to consolidate and document our process for consistency in the below

scenario's, noting they all relate to the surrender of items by firearms license holders who are compliant in that they have entered these into the registry in good faith.

-
Process for Compliance to escalate to other TTP workgroups (district) and/or district constabulary staff

If we have confirmed the firearm/magazine is in fact prohibited, that an item has no permit or endorsement is not held, and we can't resolve, there are several scenarios that we to undertake to establish including escalating to other TTP workgroups (District) and/or district constabulary staff (highlighted in yellow) as step processes.

1. Fail to engage
 1. Use of full range of comms
 2. Reminder with narrative including reference to "Compliance Action"
 3. No engagement
 4. Escalate via District to TTP Staff/ Constabulary Staff (pathway to be ascertained and awaiting confirmed tasking model)
 5. Discover Unlawful Modification

2. Agreed to surrender but doesn't.
 1. Use of full range of comms
 2. Discussion re limited options (Endorsements/ PTP's / Modification/ Transfer to Endorsement holder)
 3. Agree to surrender
 4. Doesn't Surrender
 5. Reminder with narrative including reference to "Compliance Action"
 - a. Doesn't Surrender after Reminder
 - b. Discover Unlawful Modification
 - c. Refuse to surrender??
 6. Escalate via District to TTP Staff/ Constabulary Staff (pathway to be ascertained and awaiting confirmed tasking model)

3. Refuses to surrender.
 1. Use of full Range of comms
 2. Discussion re limited options (Endorsements/ PTP's / Modification/ Transfer to Endorsement holder)
 3. Refuses to Surrender, and doesn't.
 4. Reminder with narrative including reference to "Compliance Action"
 5. Escalate via District to TTP Staff/ Constabulary Staff (pathway to be ascertained and awaiting confirmed tasking model)

We believe that currently district TTP teams are better placed to coordinate these tasks through to completion. Districts have the knowledge, can communicate and accelerate validation tasks more promptly than a constabulary /DCC tasking and are better placed to have additional conversations with a FAL. They can coordinate with the FAL to bring the firearm / part to Police, noting a FAL can surrender to any Police station and TTP staff would through PROP end up managing the same. Additionally, if necessary the matter could be escalated to Police but again,

localised coordination would result in a prompt response. However, the appetite from the district TTP teams for this work is varied, and we appreciate that what may compound the lack of appetite is a lack of agreed process here.

You will all be interested in the volume. We don't have accurate data being only some months in but we receive an average of 31 events per week and are working through a backlog of 160. Increase in registry and pending ammo sales will increase Registry event notifications. What may be seen as low numbers should not be construed as easy resolutions, they are complex and at times requires a wider knowledge skill set than held in the team. An event generally averaged 2 ½ hours to remedy subject to permitting ease. We are informed that currently only resolving 50% of these events ourselves, and are relying on adhoc processes for requesting District to assist with the rest, noting in some cases Compliance has reached out to constabulary directly.

So very broadly, 50% of the 31 (15) of the Other Event – A-cat' events within our current demand request to all the Districts.

Happy to meet and discuss options.

Information about the surrender of unlawfully held prohibited firearms, prohibited magazines, pistols and restricted weapons

On 20 October 2023 an interim communication was sent to managers with respect to the modification of prohibited firearms. This communication was a result of unlawfully held prohibited firearms being entered into the Registry, with staff enquiring as to how best to deal with these items and licence holders.

We continue to find unlawfully held prohibited items, pistols and restricted weapons within our licensing community for a variety of reasons. The introduction of the Registry is providing more oversight over these unlawfully held items, which are sometimes entered into the Registry by well-meaning licence holders.

This updated communication provides the final decision from ALT with respect to managing unlawfully held prohibited firearms, prohibited magazines, pistols and restricted weapons, where we become aware of them due to a licence holder interacting with Te Tari Pūreke.

Prohibited firearms and prohibited magazines

The definition of a prohibited item is included here:

- [2A Meaning of prohibited firearm](#) (for prohibited firearms)
- [2B Meaning of prohibited magazine](#) (for prohibited magazines)

Modification of lawfully held prohibited firearms

The Arms Regulations for the Registry were updated in June 2023 to include information about modifying a prohibited firearm to be non-prohibited. This became an activating circumstance and 'event' which must be recorded in the Registry.

The details of the firearm before and after modification, and a certification from a person authorised by Te Tari Pūreke must be provided to show that the modification has been properly carried out and shows that the firearm is permanently modified. A list of authorised gunsmiths will be produced in the future.

The process is premised on the assumption that (usually) the person notifying Police that they have modified a prohibited firearm to non-prohibited, would have **lawfully possessed/held** that prohibited firearm in the first place by having the required endorsement and permit.

Modification to a lawfully held prohibited weapons would need to be in line with what we allowed in the Buyback and need to be done at the licence holder's own expense.

These types of weapons were allowed to be modified in the Buyback:

- non-detachable tubular magazines on semi-auto or pump action shotguns,
- .22 or lower rimfire semi-automatic firearms, and
- other firearms that aren't prohibited in themselves (i.e. lever action, pump action) but that had non-detachable tubular magazines where the magazine capacity was greater than 10 rounds.

To be in line with modification accepted in the Buyback, modification needs to be permanent and irreversible.

Under no circumstances are centrefire semi-automatic rifles allowed to be modified.

Modification of lawfully held detachable prohibited magazines

There is no mechanism in the Act that allows for the modification of prohibited magazines to non-prohibited magazines, apart from those that are non-detachable tubular magazines on a firearm (see bullet point list above).

Under no circumstances are detachable box magazines allowed to be modified.

Modification of unlawfully held prohibited firearms and prohibited magazines

Our direction for staff is that, unless the licence holder already has the required endorsement and permit to hold or obtain the prohibited item, no modifications should be allowed and the prohibited item must be surrendered to Police or to a dealer (who must then surrender it to Police within 5 working days).

Applications or disputes about permits to possess for unlawfully held prohibited firearms or prohibited magazines

Some endorsement holders or dealers who surrender an unlawfully held prohibited firearms or prohibited magazines may want to be permitted to keep their item and may apply for a permit to possess (PTP).

They have the right to apply for a permit to possess, and each application should be considered on its merit, however we are not required to issue the permit to possess. See below for what should be considered if a licence holder applies for a PTP to keep the item.

Prohibited firearms

Prohibited firearms held by prohibited endorsement holders in which there is a permit dispute or dispute about previously received advice (for example they have lost their permit or claim they had a permit, but our records show otherwise, or they received incorrect advice in the past) can remain with the endorsement holders (unless already surrendered to Police) until enquiries and decisions about the permit have been concluded.

If an endorsement holder or dealer applies for PTP to keep a prohibited firearm that they surrendered to Police, we may refuse the application on the ground that Clause 6 of Part 1 of Schedule 1 in the Arms Act is still current, which states that surrendered prohibited items become property of the Crown.

Prohibited magazines

Prohibited magazines held by prohibited endorsement holders in which there is a permit dispute or dispute about previously received advice (for example they have lost their permit or claim they had a permit, but our records show otherwise, or they received incorrect advice in the past) can remain with the endorsement holders (unless already surrendered to Police) until enquiries and decisions about the permit have been concluded.

If an endorsement holder or dealer applies for PTP to keep a prohibited magazine that they surrendered to Police, we may refuse the application on the ground that Clause 6 of Part 1 of Schedule 1 in the Arms Act is still current, which states that surrendered prohibited items become property of the Crown.

Consideration may be given as to whether the endorsement holder was unintentionally non-compliant (versus intentionally non-compliant and purposefully did not obtain the permit to possess in the past).

What if the person does not have the endorsement?

Prohibited firearms and prohibited magazines held by licence holders who do not have the prohibited endorsement must surrender the items to Police or a dealer (who must then surrender it to Police within 5 working days).

Pistols and restricted weapons

Modification of pistols and restricted weapons

No modifications of pistols or restricted weapons are allowed under any circumstances.

Pistols or restricted weapons that are unlawfully held by licence holders who do not hold the appropriate endorsement(s) and permit must be surrendered to Police or a dealer (who must then surrender the item to Police within 5 working days).

Applications or disputes about permits to possess for unlawfully held pistols or restricted weapons

Some licence holders or dealers who surrender an unlawfully held pistol or restricted weapon may want to be permitted to keep their item and apply for a permit to possess.

They have the right to apply for a permit to possess, and each application should be considered on its merit.

Pistols or restricted weapons held by endorsement holders in which there is a permit dispute (for example they have lost their permit or claim they had a permit but our records show otherwise) can remain with the endorsement holders (unless already surrendered to Police) until enquiries about the permit have been concluded.

What if the person does not have the appropriate endorsement?

Pistols or restricted weapons held by licence holders who do not have the appropriate endorsement must surrender the items to Police or a dealer (who must then surrender it to Police within 5 working days).

Disposal

For licence holders who were in unlawful possession of any of these items and who surrender them, we can dispose of the items as we deem appropriate.

An arms chapter about surrender and disposal of arms items is currently being drafted by the Operational Policy Team.

From: [CRAWFORD, Steven \(Steve\)](#)
To: [WILSON, Richard \(RJ\)](#); [BAIRD, Peter](#)
Subject: Prohibited firearms - tube magazines.
Date: Tuesday, 1 April 2025 1:31:37 pm
Attachments: [10. Price List KPMG ABB2 Report - FINAL.pdf](#)
[QAA0204 - 27-03-2025 - Arms items registered and surrendered - Steve Crawford.xlsx](#)
[image002.png](#)

RJ, Pete

As requested, P and I have done a search on all Prohibited items listed as surrendered and I have filtered for shotguns and .22 rifles this leaves 111 items surrendered.

Not all these items will be destroyed as yet as some will still be sitting in stations, more work is required to identify how many items have been actually destroyed as this requires the checking of 3 systems, NIA, AIS, and PROP to validate. It is work P and I could be tasked with if required.

I have used the price lists as gazetted in the below links as ABB1 had these items priced. I have pulled the list for the most relevant items, the rimfire .22 tube fed rifles, and shotguns.

A quick summary of a cost to compensate LH for surrendered items using the used price is as follows.

Note.

- The price is based on the **USED** price, there may be some dispute over condition etc which will affect the overall costings.
- This is an initial estimate only, more work will be required to confirm these numbers and identify what items are held but not yet destroyed.

Type	Amount	Used Price	Total
. 22 Semi-Automatic	14	\$420	\$5880
.22 Rifle Pump action	13	\$560	\$7280
.22 rifle Lever action	20	\$700	\$14000
.22 Rifle bolt action	55	\$245	\$13475
Shotgun Akkar	1	\$350	\$350
Shotgun Mossberg 500	2	\$700	\$1400
Shotgun Mossberg Mav88	1	\$350	\$350
Shotgun Winchester 1300XTR	1	\$525	\$525
Shotgun Benelli M2	1	\$1750	\$1750
Shotgun Hatsan	1	Not listed Est \$575	\$575
Shotgun Beretta	1	\$1050	\$1050
Shotgun Yildiz	1	\$525	\$525
TOTAL	111		\$47160

<https://gazette.govt.nz/notice/id/2021-go53>

<https://gazette.govt.nz/notice/id/2019-go2786>

Ngā mihi nui,

Inspector Steven Crawford
Deputy Compliance and Resolutions Manager
M **s 9(2)(a) OIA**
E Steven.crawford@police.govt.nz



<https://www.firearmssafetyauthority.govt.nz>

[SEEMAIL]

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Withheld - outside scope of request

BARRETT, Jessica (Jess)

From: KUHN, Lucette
Sent: Friday, 9 May 2025 12:34 pm
To: BOND, Joanna; BARRETT, Jessica (Jess)
Cc: BAIRD, Peter; BRODIE, Hamish
Subject: RE: Modification of prohibited firearms - new forms FW: version 10 ALT .22

s 9(2)(h) OIA

Lucette Kuhn
Legal Counsel
Legal Services
PNHQ

M s 9(2)(a) OIA
E lucette.kuhn2@police.govt.nz



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[SEEMAIL]

From: BOND, Joanna <Joanna.Bond@police.govt.nz>
Sent: Friday, May 9, 2025 12:10 PM
To: BARRETT, Jessica (Jess) <Jessica.Barrett@police.govt.nz>; KUHN, Lucette <Lucette.Kuhn2@police.govt.nz>
Cc: BAIRD, Peter <Peter.Baird@police.govt.nz>; BRODIE, Hamish <Hamish.Brodie@police.govt.nz>
Subject: RE: Modification of prohibited firearms - new forms FW: version 10 ALT .22

s 9(2)(h) OIA

s 9(2)(h) OIA

Ngā mihi

Joanna Bond
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PNHQ

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[SEEMAIL]

From: BARRETT, Jessica (Jess) <Jessica.Barrett@police.govt.nz>
Sent: Friday, May 9, 2025 10:11 AM
To: KUHN, Lucette <Lucette.Kuhn2@police.govt.nz>; BOND, Joanna <Joanna.Bond@police.govt.nz>
Cc: BAIRD, Peter <Peter.Baird@police.govt.nz>; BRODIE, Hamish <Hamish.Brodie@police.govt.nz>
Subject: Modification of prohibited firearms - new forms FW: version 10 ALT .22

s 9(2)(h) OIA

Ngā mihi nui

Jess

Jessica Barrett (she/her)
Operational Policy Lead

Waea Pūkoro | Mobile: **s 9(2)(a) OIA**
Īmēra | Email: Jessica.Barrett@police.govt.nz



<https://www.firearmssafetyauthority.govt.nz>

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[SEEMAIL]

From: BRODIE, Hamish <Hamish.Brodie@police.govt.nz>
Sent: Friday, May 9, 2025 9:06 AM
To: BARRETT, Jessica (Jess) <Jessica.Barrett@police.govt.nz>; BAIRD, Peter <Peter.Baird@police.govt.nz>
Cc: CRAWFORD, Steven (Steve) <Steven.Crawford@police.govt.nz>
Subject: RE: version 10 ALT .22

Hi

Attached forms withheld - Declaration forms outside of scope of request

Here are the latest versions of the forms as well.

I think they look pretty good, and the functionality of them seems to all work, and work well.

Please have a look and let me know of any last feedback.

Thanks

Hamish Brodie
Operational Policy Advisor
Te Tari Pūreke
Firearms Safety Authority

M **s 9(2)(a) OIA**
E hamish.brodie@police.govt.nz



[SEEMAIL]

From: BARRETT, Jessica (Jess) <Jessica.Barrett@police.govt.nz>
Sent: Friday, May 9, 2025 9:02 AM
To: BAIRD, Peter <Peter.Baird@police.govt.nz>

Cc: CRAWFORD, Steven (Steve) <Steven.Crawford@police.govt.nz>; BRODIE, Hamish <Hamish.Brodie@police.govt.nz>

Subject: RE: version 10 ALT .22

Hi Pete,

I don't have any further feedback on the paper.

Here is the latest version of the policy. The plan is to publish it in the 'Endorsements and conditions' arms chapter and 'Dealers, gunsmiths and auctioneers' as they are the most logical places at the moment.

Ngā mihi nui

Jess

Jessica Barrett (she/her)
Operational Policy Lead

Waea Pūkoro | Mobile: **s 9(2)(a) OIA**
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[SEEMAIL]

From: BAIRD, Peter <Peter.Baird@police.govt.nz>

Sent: Monday, May 5, 2025 9:05 AM

To: BARRETT, Jessica (Jess) <Jessica.Barrett@police.govt.nz>; BRODIE, Hamish <Hamish.Brodie@police.govt.nz>; COLEMAN, Peter (Pete) <Peter.Coleman2@police.govt.nz>; ADAMS, Hope <Hope.Adams@police.govt.nz>

Cc: GRAY, Rachel <Rachel.Gray@police.govt.nz>; WILSON, Richard (RJ) <Richard.Wilson@Police.Govt.NZ>;

CRAWFORD, Steven (Steve) <Steven.Crawford@police.govt.nz>

Subject: version 10 ALT .22

Good morning all.

Attached appears to be the close final version of the **modified .22 ALT paper** subject to anything critical.

Please note on the good advice received from all invested in this remedy, that there are now two forms, an **Owners Arms Declaration** and a **Gunsmith Arms Declaration** (drafts attached) . This makes an easier demarcation for Registry staff.

Next step for me is to await final feedback from Policy, attached the draft Op Policy (which may now need adjustment), package up with the forms and the email / policy bundle, and formally provide to RJ

Ngā mihi nui

Inspector Peter Baird
Manager Compliance

Regulatory Compliance and Investigations
Firearms Safety Authority | Te Tari Pūreke

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E Peter.baird@police.govt.nz



<https://www.firearmssafetyauthority.govt.nz>

[SEEMAIL]

Non-prohibited firearms with non-detachable tubular prohibited magazines

This policy applies only to licence holders who have complied with their Registry requirements and have unintentionally or mistakenly found themselves in unlawful possession of the prohibited item.

Unless otherwise specified, all modification requests can only be assessed and approved by the Firearms Compliance Team – Te Tari Pūreke.

The types of firearms this guidance applies to are **0.22 or lower rimfire rifles** that are not prohibited in themselves (i.e. **bolt action, lever action or pump action rifles**), but that have **non-detachable tubular magazines** where the magazine capacity is greater than 10 rounds. It does not apply to *any* other firearm types.

The intention with this guidance is to enable licence holders who have attempted to do the right thing in the Registry and who have tried to comply with the law as they understood it, to become compliant.

If a licence holder has knowingly and willingly not complied with the law, then this guidance does not apply to them.

The changes to our guidance are summarised as the following:

- allowing for modification of prohibited non-detachable tubular magazines on **certain** firearms that would otherwise be non-prohibited firearms.
- more readily considering licence holders for prohibited endorsements (either collector or heirloom/memento endorsements) so that licence holders may retain prohibited items that are important to them.

The broad policy approach, which has been to consider applications on a case-by-case basis, remains in place.

Modification of unlawfully held prohibited non-detachable tubular magazines that render the firearm prohibited

If a licence holder possesses a non-prohibited firearm equipped with a non-detachable tubular prohibited magazine, then we can consider allowing the licence holder to seek modification of the prohibited magazine by a licensed dealer gunsmith, to return the firearm to being wholly non-prohibited.

This approach must only be used for **0.22 or lower rimfire rifles** that are not prohibited in themselves (i.e. **bolt action, lever action or pump action rifles**), but that have **non-detachable tubular** magazines where the magazine capacity is greater than 10 rounds.

Under no circumstances are the following items allowed to be modified using this policy approach:

- unlawfully held rimfire or centrefire semi-automatic rifles
- unlawfully held centrefire pump action rifles
- unlawfully held semi-automatic or pump shotguns
- any other firearm (restricted weapon, pistol etc)
- detachable box magazines or any other types of magazines

To be lawful, modification must be undertaken by a licensed dealer gunsmith (who should first obtained a permit to possess) in a way that ensures the firearm and magazine is permanent and irreversibly no longer prohibited.

Only once the declaration is received by Te Tari Pūreke can the licence holder's firearm be changed to 'non-prohibited' in the Registry.

There will be no compensation for licence holders who opt for modification. Any costs must be met by the licence holder themselves, and Te Tari Pūreke or Police will not be responsible for any damage or loss of value due to the modification.

Note: The licence holder also has the option to surrender the firearm to the Crown for disposal or destruction. See 'Surrendering for disposal without compensation'.

Managing licence holders who have already modified their non-detachable tubular magazine

There may be licence holders who modified their non-detachable tubular magazine without us knowing at the time. As these cases come to light, the licence holder must provide a declaration from a licensed gunsmith, which validates that the modification was permanent and irreversible. Photographs of the item may be requested.

Only once the declaration is received by Te Tari Pūreke can the licence holder's firearm be changed to 'non-prohibited' in the Registry.

Note: The licence holder also has the option to surrender the firearm to the Crown for disposal or destruction. See 'Surrendering for disposal without compensation'.

Considering endorsement applications for unlawfully held prohibited firearms or prohibited magazines

If a licence holder is in unlawful possession of a prohibited firearm or a prohibited magazine that cannot be modified or that they do not want to modify, then another approach is to consider an application from that licence holder for a prohibited endorsement.

There are only two capacities that will be considered - a bona fide collector or a memento or heirloom.

The person **must** meet the criteria of a bona-fide collector to be considered for this endorsement. Do not issue a bona-fide collector endorsement to a person who does not satisfy you that they are a bona-fide collector. This endorsement must not be used solely for the purpose of allowing the licence holder to retain the prohibited item.

If the licence holder is already a bona fide collector of pistols or restricted weapons, then they could be more readily considered for this endorsement¹.

If the licence holder has not been an endorsement holder previously, then the memento/heirloom endorsement may be the most appropriate endorsement. For the memento/heirloom endorsement, a licence holder should only be seeking to retain one or two prohibited items that have personal significance to them.

During interviews with any licence holder in this situation, they must be made aware of the seriousness of their unlawful possession of the prohibited item.

- If the licence holder was genuinely not aware they held a prohibited item, then the endorsement may be issued, assuming the licence holder meets the other applicable criteria for the endorsement.
- However, if the licence holder knowingly and willingly unlawfully possessed a prohibited item since the 2019 buyback and legislative changes, this must be factored into the assessment.

For information about the bona-fide collector and memento/heirloom endorsement types, see the [Endorsements and conditions](#) arms chapter.

Note: The licence holder also has the option to surrender the firearm to the Crown for disposal or destruction. See 'Surrendering for disposal without compensation'.

Surrendering for disposal without compensation

For licence holders who were in unlawful possession and the final decision is to require seizure or surrender, or the licence holder opts to surrender once we have come into possession of the prohibited item, it must be disposed of in line with the 'Disposal and destruction of non-Police firearms' [Police Manual](#) chapter. It must be made clear to the licence holder that they are surrendering for disposal or destruction without compensation.

For further information, see the guidance document on seizure and disposal and voluntary surrender and disposal, which is available on the Firearms Hub [here](#).

Surrender is the only option if the person is not a licence holder

If a person is not a licence holder and is unlawfully in possession of a prohibited item, the prohibited item must be surrendered to Police or to a dealer (who must then surrender it to Police within 5 working days).

Recording of decision making and outcomes

It is important that the following information is properly recorded in NIA on the relevant Firearms Event:

- Summaries of verbal conversations with the licence holder

¹ If the licence holder already holds a prohibited endorsement as a bona fide collector of prohibited items or for heirlooms/mementos, then they could be more readily considered for a permit to possess to retain the item.

- Decision making process and how it fits in with this policy. If policy guidelines are not followed, this should be explained, and reasons given for the departure from policy.
- Reason for the final decision and outcome. If a recommendation for a decision was made and the decision-maker did not accept it, the reasons for the decision should be recorded, together with any new or different matters that were considered.

All forms, certificates and email chains must be attached to the Event.

ARMS LEADERSHIP TEAM

Paper Title: Proposal to manage existing .22 rimfire rifles with prohibited non-detachable tubular magazines.

Sponsor: Insp PGR Baird, Director – Regulatory Compliance and Investigations (acting)

Presenter(s): Insp S Crawford, Manager Compliance (acting)

Meeting Date: 26 May 2025

Consultation

Police Legal
Compliance
Communications
Registry Services Team

Operational Policy
Director Service Delivery (acting)
Partnerships

Purpose

The purpose of the attached paper is to inform ALT on the proposed direction of receipting firearms with prohibited magazines for Firearm Licence Holders (FLH) who are non-endorsed but otherwise fit and proper. They are described as **.22 rimfire or lower calibre lever, bolt, and pump actions firearms with a non-detachable tubular magazine**.

This developing matter has implications for, Partnerships, Communications, operational process and policy.

The intent is to provide existing FLHs, currently in possession of prohibited non-detachable tubular magazines for .22 rifles rimfire or lower and the other non-prohibited .22 similarly configured firearms, the opportunity to surrender, make application for a prohibited heirloom or collector endorsement, or to modify the prohibited magazine into an A Category configuration with a supporting declaration.

It is considered that pathways through endorsement or modification benefits the Regulator through ensuring more firearms are entered in the Registry and removes prohibited firearms from circulation.

For awareness, and bringing to the attention of ALT, that there are approximately 111 firearms that fit the description of having previously been destroyed, (valued at approximately \$48k) and the owners not having the opportunity to modify or seek an endorsement.

Recommendations

It is recommended that ALT:

- I. **Approve:** The Compliance solution pathway for FLHs to resolve the ongoing .22 rimfire or lower rifles with prohibited non-detachable tubular magazines who are actively bringing their firearms into the Registry by offering the FLH solutions which with the exception of surrendering, will recognise the firearm within the Registry.
 - *All .22 rimfire or lower firearms with a prohibited non-detachable tubular magazine or lower and other non-prohibited .22 similarly configured firearms that are prohibited, on being received by the Registry, be notified of the remedial options (surrender, recognition of previous modification, modification or endorsement).*

- *Compliance will manage all sequences on receiving a Registry event.*
 - *Previously modified firearms will be recognised as being non-prohibited and compliant through a FLH declaration which includes a gunsmith declaration. This will be at the firearm licence holders' expense.*
 - *Any firearms requiring modifications will be supported by a declaration by a gunsmith. Modifications will be at the firearm licence holders' expense.*
 - *The communications package is being prepared for both public and internal staff, ensuring consistency of messaging to licence holders.*
 - *A Declaration Form confirming an existing or subsequent modification has been developed.*
 - *Existing policy and practice are being moderated to meet this descriptive.*
- II. **Approve:** all options as described in the paper, that an event will be generated by the Registry and sent to Compliance who will triage and support solutions. Compliance will manage the non-complaint issues including taskings to Districts.
- III. **Approve:** the attached policy, communications, and declaration form.
- IV. **Direct that:**
- **Compliance** be the mechanism for resolving or taskings non-compliant matters.
 - **Districts** manage the surrenders and endorsements.
 - **Communications** review current mediums for Policy changes to staff, and assist/prepare suitable internal and external communications including web information and create the intended Declaration Form.
- (i) **Note that:**
- Existing legislation doesn't specifically exclude the mechanism to modify a firearm or provide a firearms licence holder the opportunity to seek an additional endorsement.
 - Identified prohibited firearms may be safely retained by the FLH until their resolution pathway is concluded.
 - The work stream will be managed through the existing workforce.
 - The mitigation of similar occurrences can be minimised through a review of current communication systems.
 - The process has been consulted with Legal.

Insp PGR Baird
Director – Regulatory Compliance and Investigations (acting)

MEMO

To: Insp PGR Baird, Director – Regulatory Compliance and Investigations (acting)

From: Insp S Crawford, Manager - Compliance (acting)

Date: 21 May 2025

Subject: Proposal to manage existing .22 rimfire or lower rifles with prohibited non-detachable tubular magazines.

Purpose

1. The purpose of this memorandum is to inform ALT on the direction being taken to manage the identified “existing .22 rimfire rifles with prohibited non-detachable tubular magazines” events. These events originate from individual firearms licence holders (FLH) registering prohibited .22 rimfire firearms with a tubular magazine or non-detachable tubular magazine that are prohibited. This paper affirms what options are to be provided to these persons, the majority of whom are seeking to retain the firearm.¹
2. **This paper pertains to the magazine capacity of non-detachable tubular magazines and is limited to .22 or lower rimfire configured as lever, bolt and pump action firearms being input into the Registry by a fit and proper FLH.**
3. **This paper’s focus is on the magazine, not the action, and excludes semi-automatics that are specifically covered in the Arms Act 1983.**
4. For clarity, in respect to the .22 rifle, the magazine is prohibited, irrespective of it being attached to or within the internals of the rifle. The simple removal of the entire magazine renders the firearm a non-prohibited firearm in both circumstances. The disposal of this magazine and replacement with a shorter or modified magazine renders it a non-prohibited firearm.
5. The paper is predicated on the knowledge that:
 - a. These individuals have been in unlawful possession of a firearm without the necessary permit or endorsement, and the corresponding security.
 - b. These firearms were not surrendered or registered during the amnesty period.
 - c. The FLH could have been subject to prosecution.
 - d. The buyback legislation is no longer available although the modification principles are being applied.
 - e. There is no compensation being offered for previously destroyed items.
 - f. To date there are approximately 100+ unresolved events being held.

Issue

6. Firearms with a prohibited magazine have come to light when the FLH, who is otherwise fit and proper, registers the firearm into the Registry, not being aware the item is prohibited in its configuration. The Firearms Reference Table (FRT) identifies the firearm as being prohibited due to the magazine. Through supervisory oversight, this event is currently being sent to the National Compliance Team for validation with the FLH and attempts then made to resolve.
7. While the tube fed .22 rimfire rifle does not meet the definition of a prohibited firearm, the non-detachable tubular magazine is classified as a prohibited magazine, and as it cannot be removed

¹ The paper excludes those FHL who are found in unlawful possession of a prohibited firearm, ie a lawful search.

from the rifle without significant work, it is all inclusive. Operational policy has been of the stance, during the amnesty period and subsequently, that the complete rifle is required to be surrendered.

8. Post the Amnesty period, Police have generally been following the process of destroying surrendered .22 rifles. There have been approximately 111 firearms seized, and the majority have been destroyed. These had an estimated value of \$47000. However, it is suspected there may also be many items surrendered that have not been recorded in AIS. To get a full picture of surrendered items a fuller investigation of NIA, PROP, and AIS would be required.
9. During the Amnesty period, FLHs were given the option to modify these firearms pursuant to section 28U of Arms Regulations. The modifications were supported by a publicly available list of Police approved gunsmiths who had opted in to this role and agreed to conduct the modifications in a prescribed way and provide certification in a specified way.
10. While correspondence was provided and available to FLHs at the time of the Amnesty, the legislation on the prohibition of this non-detachable tubular magazine .22 firearm subset may not have been clear to some. The description within the legislation may not have provided specific clarity to the FLH on this matter. Lack of clarity has been found to be a reason why some licence holders still retain these firearms.
11. The FLH was required during this period to use an approved gunsmith.
12. A certificate of completion or declaration by the recognised gunsmith was produced to evidence that the modifications were completed. FLHs were also able to claim compensation, up to \$300, for the costs associated with the modifications undertaken. This opportunity for compensated modifications was repealed on 31 December 2020.
13. While operational policy has been settled since discussion in 2023 and on the final publication of policy since February 2024, variances continue to occur through individual FLH modifying firearms (without any guidance in place, possibly using dealer gunsmiths), *and* inconsistent advice by Regulator employees.
14. Removing the magazine inner tube, removing the magazine completely, or modifying the magazine inner tube to accept only 10 rounds or less, are modifications that would resolve the matter.
15. While 28U of Arms Regulations 1992 has been repealed, there is nothing in the Act or Regulations that prohibits discretion to allow a modification to make the FLH's firearm compliant or allowing applications for endorsements and subsequently permits to make the possession lawful.

Recommended Solution

Registry Service Team (RST)

16. On RST becoming aware through the FLH submission that the firearm fits the parameters of having a large capacity magazine (identified through the FRT), RST will assign an event to Compliance.

National Compliance Team

18. The National Compliance Team will contact the FLH and through discussion explain the options being offered.

- a. **Validation of the firearm as a non-prohibited through a declaration by a recognised gunsmith, or;**

- b. Modification: seek to have the firearm to be modified through a recognised gunsmith, or;**
 - c. Surrender Destroy: surrender the firearm to the crown for destruction, or;**
 - d. Endorsement and Permit (Heirloom/Memento): Surrender or secure the firearm while endorsement is sought (having met the criteria), or;**
 - e. Endorsement and Permit (Collectors): Surrender or secure the firearm while endorsement is sought (having met the criteria for the endorsement).**
19. For option a or b, the FLH will complete a Declaration Form together with a gunsmith. The gunsmith is either recognising and validating previous modifications or is undertaking modifications to the firearm's magazine. Compliance can request a photo of the modification if there is doubt or concern.
20. On the return of the Declaration, and the firearm magazine being confirmed as non-prohibited, the firearm's details are changed in AIS and shown as non-prohibited. The event would be closed.
21. The Declaration will be attached to the event which is attached to the FLH held against the licence holder in the Registry.
22. For a FLH seeking an endorsement, options d or e, the firearm status remains prohibited, until the relevant endorsement is applied for. Failure to initiate any action within 14 days will require follow up action. If the endorsement is ultimately refused, then modification can still be an option for these people.

Option 1: Surrender

23. As a result of the Compliance conversation, the FLH may surrender the firearm under section 59B of the Act. Noting this process may require tasking to District to assist in the uplift or retrieval of the item, their management, FLH follow up, and entry into PROP. Compliance would retain the event and task District when required.
24. There is no compensation for the FLH. The matter is concluded through the surrender of the firearm for destruction.
25. This option is reasonably structured through existing Compliance management and can be coordinated within a singular work stream.

Option 2: Modification

26. Compliance will hold the task and provide oversight through to completion. This work stream will continue to have impact on the wider Compliance work group through staff reallocation, training, and volume resolutions.
27. It is envisaged that the modification option will be the main work stream. Compliance will provide the FLH an opportunity to modify the firearm's prohibited non-detachable tubular magazine only.
28. Partnerships will socialise the policy approach with the Dealer fraternity, the intent to utilise gunsmiths in undertaking modifications and/or validate previous modifications including completing a declaration.
29. There are 114 gunsmiths holding a prohibited endorsements across the country and 198 general gunsmiths. The Declaration form (attached) will state that the work undertaken has validated an existing modification and detailed the work undertake to configure the item to a non-prohibited magazine.

30. Selecting a gunsmith is independent of TTP, as are all associated costs. Gunsmith details can be sourced from the internet or through local dealers or suggested by Compliance. The goal is to increase compliance then we need to make this as easy as possible and helping licence holders in terms of who they can go to among the dealer/gunsmith community will help FLHs in this situation to comply

Process for Options a and b (Aligning to previous Amnesty principals)

31. A gunsmith examines or modifies the item and completes the Declaration Form.
32. This possession by the gunsmith will require a permit if the firearm is prohibited. Permit acquisition is a well-known and understood pathway for gunsmiths.
33. The Declaration completed by the gunsmith would confirm that either, the firearm had already been modified and detail the work previously undertaken or would describe the work undertaken by this gunsmith to make the firearm's magazine non-prohibited.
34. The Compliance Team will validate the modifications by receiving the Declaration from the FLH. Compliance would retain the event.
35. A change of policy will be supported by broad communications, and additional guidance documents.

Option 3 and 4: Heirloom and Collector Endorsements

36. The FLH may apply for an Heirloom or Memento Endorsement or a Bona Fide Collector Endorsement. This is through an application to NST and the FLH is required to meet the endorsement requirements. There is no lowering of the standard for either endorsement.
37. While the application process proceeds and security requirements are being met, FLH could be required to surrender the prohibited firearm for safekeeping.
38. In order for any prohibited heirloom or prohibited collector endorsement to be approved the FLH would require the upgrade of their security, and the endorsement application may take some time to process.
39. Through supporting the FLH retaining the item during the endorsement application period, given they are otherwise fit and proper retention of the firearm is preferred, there would continue to be optics as to its location, and such retention would reduce the necessity of administration overheads i.e. recovery, PROP, storage, and final release.

Benefits of the solution

- It encourages some 'grey guns' being brought into the Registry and reduces the likelihood of these arms items 'going to ground'.
- A voluntary surrender of prohibited items minimises a prosecution risk (albeit discretionary) if later found in possession.
- The early declaration places the onus on the FLH to confirm the firearm is a non-prohibited firearm.
- The declaration record is held against the individual.
- It accounts for honest mistake or individual circumstances, and therefore provides a fair and reasonable outcome.
- Provides an avenue for items with historical or sentimental value to be retained.
- Provides options for a FLH, who other than being in possession, is fit and proper.
- Provides a single work stream that will minimise ad hoc internal or external influences that have impacted on a legislative pathway, with all relevant firearms following an established process and are duly considered by a small team.
- This can be managed by careful consideration of circumstances, referral to senior staff members, and crafting appropriate guidelines.

- There is no bar against changing exiting policies to ensure a better fit for purpose.
- The process supports prohibited items becoming lawful, being visible to Police and kept in secure storage arrangements, all of which will increase engagement and public trust in the Regulator.
- New policy accommodates modifications, endorsements, and the identification of previously unlawfully held prohibited firearms and prohibited magazines, which is in the public interest.
- Ultimately the Regulator's focus is safety, and any policy decision should have this focus at its core the prescribed actions illustrate the ongoing basis of gauging whether policies are still fit for purpose.

Risks to be considered

- Change of Policy in allowing modification of these prohibited magazines, may cause adverse media, political, and social media commentary.
- Legislatively section 28U of the Arms Regulations that provided for modification of these items at Crown expense has been revoked.
- Current policy has required that items are surrendered and destroyed. It is estimated over 100 of these items have been destroyed post Amnesty.
- It is likely this group of FLHs who have now lost firearms will have an adverse opinion of this change in policy and may attempt to seek compensation in some way.
- This change of policy may result in other FLHs requesting an expansion of the policy to include centrefire semi-automatics, or other prohibited magazines.
- It may be seen that Te Tari Pūreke are promoting circumvention of current legislation by allowing modifications of prohibited firearms post amnesty.
- It is noted that allowing for modifications/endorsements is not precluded in the Act, however the FLH who brings the firearm into the Registry would not hold an existing permit and would for the intervening period between discovery and modifying the item, continue to not hold a permit for its possession.
- The obtaining of permits to possess these items by Gunsmiths while undertaking the work required is unlikely to be adhered to and may be seen as unnecessary by Gunsmiths and FLHs.

Post Amnesty costs

40. Enquires have been undertaken to ascertain the previous cohort of prohibited items identified as having been surrendered and destroyed post Amnesty between July 2023 and March 2025 due to having a prohibited magazine. Within the data below, some arms items may not have extended magazines.
41. The data is provided for consideration should the matter of compensation of destroyed items be raised. This is mitigated through Schedule 1, Part 1, clause 6 of the Act which makes it clear that prohibited items surrendered to Police becomes the property of the Crown², free and discharged from all right, title, or interest³, with no right of compensation. Additionally, there is protection provided in sections 71 for persons acting under the Act supports previous actions undertaken.
42. This schedule of surrendered firearms does not include surrendered prohibited magazines that were not attached to an otherwise non-prohibited firearm. Some firearms may currently be being held in abeyance awaiting the approval of this updated policy. approach
43. The information is derived from AIS registered and surrendered items only (see attached). PROP information is not generally available to Te Tari Pūreke, it is holding generic descriptives and not stipulate magazine quantity and as such would be unreliable. Prices are based the price paid for used items during the Amnesty.

² Clause 6 of Schedule 1, Part 1 of the Act is still in effect. Any surrendered prohibited item becomes the property of the Crown, free and discharged from all right, title, or interest possessed by any person in respect of that item.

44. The below figures are accurate to May 2025, and subject to change as more items come to Te Tari Pūreke attention and are surrendered (table includes semi-automatics).

i. Type	Amount Surrendered	Total Price
ii. .22 semi, pump, lever and bolt	103	\$40985
iii. Shotguns	8	\$6175
iv. Total	111	\$47160

45. **Attachments**

Bundle

Draft Communication Intent

Antique Arms newsletter

Draft Policy paper

Draft Owner Gunsmith Arms Declaration **Attachment withheld - out of scope of request**



Background / Issue

A number of licence holders have recently come to our attention trying to register their firearm(s), with the Firearms Reference Table (FRT) revealing they are in possession of a non-prohibited firearm that has a prohibited magazine. The firearms are .22 calibre rimfire rifles with non-detachable tubular magazines of more than 10 rounds. The firearms wouldn't be prohibited but for the prohibited tubular magazine. Other than being in possession of these firearms, licence holders are 'fit and proper'. A lack of clarity at the time of the Amnesty appears the likely reason as to why these licence holders retained the prohibited firearms.

To assist these licence holders (with .22 calibre firearms with large tubular magazines), Te Tari Pūreke is offering four pathways, including getting the firearm modified. Modification would operate similar to the modifications process during the Amnesty. However, this pathway could be contentious, as previously this was not available to licence holders, and some will have already disposed of their firearms, and those with other calibres/firearms types (especially shotguns) may believe they are in an analogous position and seek expansion of the modification policy [see 'Additional notes'].

Objective(s)

- To inform the firearms community of the pathways available if they are in possession of .22 calibre rimfire rifles with non-detachable tubular magazines of more than 10 rounds.
- To explain 'why' this policy applies only to .22 rimfire.

Audience(s)

- Minister(s) offices
- Firearms community (networks) – including dealers/gunsmiths.
- Mainstream media (proactive – being clear on our narrative)

Approach

- Te Tari Pūreke will use its stakeholder networks to inform the firearms community of this change.
- Te Tari Pūreke will issue a media release giving a strong 'why' behind this change (and will do any media requesting comment).

(Note: We propose not using our Facebook channel for this announcement).

Messages (high level)

- In April 2019, in the immediate aftermath of the Christchurch terror attacks, changes were made to reduce the number of semi-automatic firearms and large capacity magazines in our communities.
- Large capacity magazines had been exploited in Christchurch mosques attacks, and had also been identified as a common feature of many mass casualty shootings in other countries.
- These changes meant magazines that held more than 10 rounds of .22 calibre (lever, bolt, and pump actions) ammunition became prohibited.
- These .22 calibre rimfire firearms wouldn't be prohibited but for the capacity of the tubular magazine. For this reason during the Amnesty period, along with surrender, licence holders were also given the option to modify these firearms, to accept only 10 rounds or less. This modification turns the firearm into what is known as a standard 'A' category firearm, or non-prohibited, which are legal to own and possess in New Zealand without additional endorsements. The opportunity for modifications was temporary and ended on 31 December 2020.
- Recently, Te Tari Pūreke has noted a number of licence holders trying to register their now prohibited .22 calibre firearms – those with large tubular magazines. We are currently dealing with approximately 30 such cases.
- These licence holders appear unaware the status of these firearms changed in 2019/2020. This is put down to a lack of clarity with regard to these specific .22 calibre firearms with large tubular magazines at the time of the Amnesty.
- To assist these licence holders becoming legally compliant, Te Tari Pūreke has identified a number of options, including reintroducing a modification pathway. There are now four potential pathways that may be available to licence holders in this position:
 - The licence holder applies for an Heirloom endorsement.
 - The licence holder applies for a Collector endorsement.
 - The licence holder surrenders the firearm for destruction.
 - The licence holder gets the firearm modified by a gunsmith, and gets a declaration the magazine is now compliant. Te Tari Pūreke will then validate the declaration.
- Licence holders choosing the modification pathway will need a gunsmith with a 'prohibited' endorsement to undertake the work. They will then need to submit an Arms Declaration Form completed by the gunsmith that the firearm(s) is now compliant. Licence holders who interact with Te Tari Pūreke staff and want to engage with this process must be directed to first register their firearm.
- Full details on the process are available on our website: [TBC](https://www.firearmssafetyauthority.govt.nz/firearms-registry/what-items-must-be-registered)

Tactical plan – Key Steps, timings and responsibilities

Timing	Activity	Responsibility
April 24	Communications Approach, and key messages completed.	Peter Coleman
April 28	Decision confirmed by ALT re .22 pathways. Confirmation of 'go live' date needed.	Peter Baird
May TBC	Inform Ministers of the issue and decision(s) taken offering 'modification' pathway. (Confirm if a Note or 'Weekly Report' item is required.)	Peter Baird / Peter Coleman
May TBC	New website content developed, tested in test site. [Suggested location – Registry – on the 'What items must be registered' page. TBC]	Peter Coleman Rose McCarthy-Bain
May D-7	Internal email-all message for our people on the change, how it works, what they need to know.	Peter Coleman
May D-1	Stakeholder messaging goes out	Partnerships & Communities team
May D-Day	Project/pathway 'Go Live'	Peter Baird
May D-Day	Media Release issued.	Peter Coleman / Comms Team
May D-Day – D + 14	Monitoring media and stakeholders for reaction / responding to queries as required.	Peter Coleman / Comms Team

Additional notes:

- While this policy in allowing modification of prohibited .22 calibre firearms / magazines is a positive step, nonetheless it may cause:
- A strong reaction from the owners of the approx. 103 similar firearms that have been surrendered and destroyed since the Amnesty ended. It is possible they call for compensation. There is no legal basis for compensation as surrender/destruction was legally mandated. (Estimated value of the firearms destroyed \$41K).
 - A strong reaction from the owners of centrefire, or firearms with other prohibited magazines - especially shotguns. They may seek an expansion of the modification policy because they feel they are being treated inconsistently. It should be noted that shotguns in excess of 5 round capacity are specifically listed as prohibited pursuant of Section 2A of the Arms Act, so it is more difficult to make the case there was any confusion over the meaning/intent of the legislative change with regard to shotguns.

HBO

Non-prohibited firearms with non-detachable tubular prohibited magazines

This policy only applies to licence holders who have complied with their Registry requirements and have unintentionally or mistakenly found themselves in unlawful possession of the prohibited item. Licence holders who approach Te Tari Pūreke proactively or who interact with our staff, must be directed to register their firearm.

Unless otherwise specified, all modification requests can only be assessed and approved by the Firearms Compliance Team – Te Tari Pūreke.

The types of firearms this guidance applies to are **0.22 or lower rimfire rifles** that are not prohibited in themselves (i.e. **bolt** action, **lever** action or **pump** action rifles), but that have **non-detachable tubular magazines** where the magazine capacity is greater than 10 rounds. It does not apply to *any* other firearm types.

The intention with this guidance is to enable licence holders who have attempted to do the right thing in the Registry and who have tried to comply with the law as they understood it, to become compliant.

If a licence holder has knowingly and willingly not complied with the law, then this guidance does not apply to them.

The changes to our guidance are summarised as the following:

- Allowing for modification of prohibited non-detachable tubular magazines on certain firearms that would otherwise be non-prohibited firearms.
- More readily considering licence holders for prohibited endorsements (either collector or heirloom/memento endorsements) so that licence holders may retain prohibited items that are important to them.

The broad policy approach, which has been to consider applications on a case-by-case basis, remains in place.

Modification of unlawfully held prohibited non-detachable tubular magazines that render the firearm prohibited

If a licence holder possesses a non-prohibited firearm equipped with a non-detachable tubular prohibited magazine, then we can consider allowing the licence holder to seek modification of the prohibited magazine by a licensed dealer gunsmith, to return the firearm to being wholly non-prohibited.

This approach must only be used for **0.22 or lower rimfire rifles** that are not prohibited in themselves (i.e. **bolt** action, **lever** action or **pump** action rifles), but that have **non-detachable tubular** magazines where the magazine capacity is greater than 10 rounds.

Under no circumstances are the following items allowed to be modified using this policy approach:

- **unlawfully held rimfire or centrefire semi-automatic rifles**
- **unlawfully held centrefire pump action rifles**
- **unlawfully held semi-automatic or pump shotguns**
- **any other firearm (restricted weapon, pistol etc)**
- **detachable box magazines or any other types of magazines**

To be lawful, modification must be undertaken by a licensed dealer gunsmith (who should first obtained a permit to possess) in a way that ensures the firearm and magazine is permanent and irreversibly no longer prohibited.

Only once the declaration is received by Te Tari Pūreke can the licence holder's firearm be changed to 'non-prohibited' in the Registry.

There will be no compensation for licence holders who opt for modification. Any costs must be met by the licence holder themselves, and Te Tari Pūreke or Police will not be responsible for any damage or loss of value due to the modification.

Note: The licence holder also has the option to surrender the firearm to the Crown for disposal or destruction. See 'Surrendering for disposal without compensation'.

Managing licence holders who have already modified their non-detachable tubular magazine

There may be licence holders who modified their non-detachable tubular magazine without us knowing at the time. As these cases come to light, Compliance should be advised of these cases, and they will manage these cases. The licence holder must work with a licensed dealer gunsmith to ensure their firearm is examined and any modifications made are certified by that gunsmith, who together with the firearms licence holder will fill in a declaration that the modification was permanent and irreversible. Photographs of the item may be requested.

Only once the declaration is received by Te Tari Pūreke can the licence holder's firearm be changed to 'non-prohibited' in the Registry.

Note: The licence holder also has the option to surrender the firearm to the Crown for disposal or destruction. See 'Surrendering for disposal without compensation'.

Considering endorsement applications for unlawfully held prohibited firearms or prohibited magazines

If a licence holder is in unlawful possession of a prohibited firearm or a prohibited magazine that cannot be modified or that they do not want to modify, then another approach is to consider an application from that licence holder for a prohibited endorsement.

There are only two capacities that will be considered - a bona fide collector or a memento or heirloom.

The person **must** meet the criteria of a bona-fide collector to be considered for this endorsement. Do not issue a bona-fide collector endorsement to a person who does not satisfy you that they are a bona-fide collector. This endorsement must not be used solely for the purpose of allowing the licence holder to retain the prohibited item.

If the licence holder is already a bona fide collector of pistols or restricted weapons, then they could be more readily considered for this endorsement¹.

¹ If the licence holder already holds a prohibited endorsement as a bona fide collector of prohibited items or for heirlooms/mementos, then they could be more readily considered for a permit to possess to retain the item.

If the licence holder has not been an endorsement holder previously, then the memento/heirloom endorsement may be the most appropriate endorsement. For the memento/heirloom endorsement, a licence holder should only be seeking to retain one or two prohibited items that have personal significance to them.

During interviews with any licence holder in this situation, they must be made aware of the seriousness of their unlawful possession of the prohibited item.

- If the licence holder was genuinely not aware they held a prohibited item, then the endorsement may be issued, assuming the licence holder meets the other applicable criteria for the endorsement.
- However, if the licence holder knowingly and willingly unlawfully possessed a prohibited item since the 2019 buyback and legislative changes, this must be factored into the assessment.

For information about the bona-fide collector and memento/heirloom endorsement types, see the [Endorsements and conditions](#) arms chapter.

Note: The licence holder also has the option to surrender the firearm to the Crown for disposal or destruction. See 'Surrendering for disposal without compensation'.

Surrendering for disposal without compensation

For licence holders who were in unlawful possession and the final decision is to require seizure or surrender, or the licence holder opts to surrender once we have come into possession of the prohibited item, it must be disposed of in line with the 'Disposal and destruction of non-Police firearms' [Police Manual](#) chapter. It must be made clear to the licence holder that they are surrendering for disposal or destruction without compensation.

For further information, see the guidance document on seizure and disposal and voluntary surrender and disposal, which is available on the Firearms Hub [here](#).

Surrender is the only option if the person is not a licence holder

If a person is not a licence holder and is unlawfully in possession of a prohibited item, the prohibited item must be surrendered to Police or to a dealer (who must then surrender it to Police within 5 working days).

Recording of decision making and outcomes

It is important that the following information is properly recorded in NIA on the relevant Firearms Event:

- Summaries of verbal conversations with the licence holder.
- Decision making process and how it fits in with this policy. If policy guidelines are not followed, this should be explained, and reasons given for the departure from policy.
- Reason for the final decision and outcome. If a recommendation for a decision was made and the decision-maker did not accept it, the reasons for the decision should be recorded, together with any new or different matters that were considered.

All forms, certificates and email chains must be attached to the Event.

Withheld - outside of scope of request



Withheld - outside of scope of request

I can't help thinking that the FSA mantra has been professing to be proactive in taking an advisory approach, and giving guidance before considering any enforcement action. Yet in this case and numerous others, its straight to enforcement. This is hardly the way to build public relations and gain the trust of the firearms community. Again, the registration/ modification of such firearms is something I have pushed in my submissions.

Withheld - outside of scope of request

I spent half a day at Warrington typing up an appeal of sorts for yet another person with a tube magazine .22 that they had registered in good faith, only to be hounded by the FSA as it was a "prohibited weapon". The FSA demanded it be handed in for destruction. I'm yet to hear back on this one, and I did give some suggestions for an appeal.

On speaking with this person (s 9(2)(a) OIA [REDACTED]), like many they were aware of the buy back, and believed the buy back was mostly about AR15's and AK's or other 'terrorist type weapons'; and had no idea that s 9(2)(a) OIA [REDACTED] pump action .22 would be considered prohibited due to the magazine capacity.

Again, the simple and most positive resolution here would be FSA advising the owner to modify the magazine to make the rifle compliant, thus rendering it an 'A category firearm'.



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Withheld - outside of scope of request



From: [TARTTELIN, Michael](#)
To: [BAIRD, Peter](#)
Subject: FW: Policy change for 0.22 calibre rimfire rifles (lever, bolt or pump action)
Date: Wednesday, 21 January 2026 1:39:16 pm
Attachments: [image001.png](#)
[Information Sheet - Policy change .22 calibre rifles with non detectable magazines.pdf](#)
[image002.png](#)
[image003.jpg](#)



Mike Tarttelin
Manager Clubs and Ranges
Compliance Lead,
Regulatory Compliance and Investigations

📞 wk cell: **s 9(2)(a) OIA**

✉ Email: michael.tarttelin@police.govt.nz



[SEEMAIL]

From: BAIRD, Peter <Peter.Baird@police.govt.nz>
Sent: Monday, 9 June 2025 8:41 AM
To: BODDY, Matthew (Matt) <Matthew.Boddy@police.govt.nz>; MCILRAITH, Michael (Mike) <Michael.McIlraith@police.govt.nz>; WOOD, Linda <Linda.Wood2@police.govt.nz>; BRAZIER, Angela <Angela.Brazier@police.govt.nz>; SMIT, Martin <Martin.Smit2@police.govt.nz>; GREENHALGH, Jason <Jason.Greenhalgh@Police.Govt.NZ>; GENNILLS, Lauren <Lauren.Gennills@police.govt.nz>; STREET, Kathryn <Kathryn.Street2@police.govt.nz>; TARTTELIN, Michael <Michael.Tarttelin@police.govt.nz>; CRAWFORD, Steven (Steve) <Steven.Crawford@police.govt.nz>; COLEMAN, Peter (Pete) <Peter.Coleman2@police.govt.nz>; BRODIE, Hamish <Hamish.Brodie@police.govt.nz>
Cc: LAMBERT, Matthew (Matt) <Matthew.Lambert@police.govt.nz>; KUHN, Lucette <Lucette.Kuhn2@police.govt.nz>; BOND, Joanna <Joanna.Bond@police.govt.nz>; WILSON, Melissa <Melissa.Wilson2@police.govt.nz>
Subject: Policy change for 0.22 calibre rimfire rifles (lever, bolt or pump action)

Good morning all

This email is to outline the changes the Arms Leadership Team has made to policy regarding prohibited magazines and how these changes may affect you in your various workstreams. This

policy changes reflects the need we have to enable safe possession and use of firearms, and is intended to help reduce the harm certain arms items can pose to society if left unrecorded and unchecked. This policy is intended to support licence holders who have registered firearms with a prohibited magazine, being unaware the item is prohibited, and who should have surrendered or modified their firearm during the 2019 Firearms Amnesty and Buyback Programme.

Policy changes for 0.22 calibre rifles only

This policy affects **rimfire 0.22 calibre rifles that are only lever, bolt or pump action**. These rifles are generally considered to be non-prohibited. The exception is when these rifles are equipped with a prohibited tubular magazine that holds more than 10 rounds. Our policy approach **does not, in any circumstance**, apply to any other class of firearm, and specifically excludes centrefire rifles, pump-action shotguns, or anything other than .22 rimfire rifles that are lever, bolt or pump-action.

Up till this point, our approach has been that licence holders must surrender these firearms when they include a non-detachable tubular magazine that is also a prohibited magazine. When a firearm has tubular magazine that holds more than 10 rounds, the magazine is prohibited and we have treated the firearm as prohibited. We currently hold a number of firearms across the country that have been surrendered by licence holders due to this exact reason. You may recall emails were sent to District to hold off destroying any .22 while a remedy was being sought. Noting that some of these firearm have been destroyed since the amnesty and prior to this policy coming into effect, there is no compensation avenue for those firearm licence holders.

Modification of prohibited magazines will be possible

From today, and going forward, we are implementing a process to allow for licence holder to modify the prohibited magazines on these firearms and to retain what are otherwise non-prohibited firearms utilising a gunsmith to make the alteration. Part of our policy approach is to also allow licence holders to seek a prohibited endorsement to possess their firearms, provided they can satisfy us that they have a good reason to retain the item and can demonstrate they are fit and proper to the level expected of an endorsement holder.

These firearms must first be registered

Anyone in Te Tari Pūreke interacting with licence holders who find these licence holders in possession of a .22 rimfire rifle with a non-detachable tubular prohibited magazine should be advising them to register their firearms. The firearm cannot be retained, as they are unlawfully in possession of a firearm with a prohibited magazine. The only option to being lawful, will be to register their firearms and wait for a compliance team member to make contact and offer a solution. This opportunity being offered to licence holders will be either modification, surrender, or on the rare occasion, a collector or heirloom endorsement should they meet the existing conditions. Our policy change means that any modifications previously undertaken will be able to be case managed and recognised, again through the use of a gunsmith.

We are contacting the owners of previously surrendered firearms

Compliance are currently investigating the number of existing surrendered firearms still held PROP, that may also meet these criteria with an intent to engage with the firearm licence holder and provide the same option.

Firearm licence holders found in possession of these firearms in circumstances outside of this

pathway , i.e. during a search warrant would continue to be subject to criminal and regulatory processes having not made an attempt to register.

Currently held rimfire .22s are to be retained

Part of this policy change is to reaffirm the directive that any firearms currently held by Police that are rimfire .22s that are lever, bolt, or pump action rifles, are not to be destroyed and are to be retained until such a time as Compliance can contact the licence holder and offer a solution. This policy change only applies to firearms that were surrendered by people who are firearms licence holders after being advised to do so by Te Tari Pūreke staff after registering their firearm.

Our new process

The approved process for modification of these .22 rimfire rifles of lever, bolt or pump action, is as follows.

- The licence holder will register the firearm in the Firearms Registry.
- RST staff will flag the firearm as prohibited and will create a Firearms Event.
- Compliance will case manage the Firearms Event with the licence holder.
- If modification is approved, the licence holder will be required to fill in the approved declaration form and will be required to engage an approved dealer gunsmith to either review and approve previously made modifications, or to undertake modifications to render the magazine permanently and irreversibly non-prohibited.
- On the licence holder receive back their now modified firearm from the gunsmith, they will further complete the declaration form, and return it to Compliance.
- Compliance, upon receipt of the completed form and satisfied the firearm has been modified to being permanently and irreversibly non-prohibited, will confirm this in the Firearms Event, change the firearm status in AIS and close the event.
- The completed declaration will be held within the event.
- Process ENDS.

You can find the policy here

A copy of the policy update has been added to the Endorsements and conditions Police Instructions chapter, available here: <https://tenone.police.govt.nz/pi/police-manual/c/arms/endorsements-and-conditions#policy-on-managing-non-prohibited-firearms-with-non-detachable-tubular-prohibited-magazines>. As now included in Police Instructions, this is a policy that all staff must follow. The info sheet supporting this change is attached.

Next steps

Our approach **at this time** is to update internal staff and the Minister of Police of this policy change. We are intending to advise the wider arms community of this change within the coming weeks, once we have started to get work underway on the existing backlog and as Compliance start to operationalise this change.

I expect there will be some communications from across the arms community to this policy change. We expect to get mixed results from the wider arms community, as many people will be happy with this change, and many others will be frustrated it did not happen sooner or has not gone far enough. However, it is our belief that this policy update strikes the right balance and focuses on people who were caught out by a gap in legislation that was not previously well communicated. People who have not complied with legislation for all these years and who have

knowingly not complied are not to be granted the benefit of the doubt and are not to be given the allowances this policy change intends.

If you have questions

I appreciate this is a practice change for the business and that you might have questions. **In the first instance, please do read the policy document above and disseminate to the relevant work streams** . We will also be doing further and additional communications as we work to update our website and work to prepare for community wide communications. If you have any further questions regarding this policy change, please direct your queries to Mike Tarttelin. Michael.tarttelin@police.govt.nz .

Thanks and kind regards

Ngā mihi nui

Peter Baird
Inspector

Director - Regulatory Compliance and Investigations (Acting)
Te Tari Pūreke | Firearms Safety Authority

M **s 9(2)(a) OIA**

E Peter.baird@police.govt.nz



[SEEMAIL]

Policy change | .22 calibre 'prohibited' firearms with non-detachable magazines

From 06 June, 2025

KEY POINTS

- The Arms Leadership Team has made a policy change for high-capacity non-detachable prohibited magazines affecting **rimfire 0.22 calibre rifles (lever, bolt or pump action)**.
- From now, licence holders who have registered these firearms will be given the option to modify prohibited tubular magazines – those holding more than 10 rounds – allowing these firearms to be retained as a non-prohibited firearm.
- Licence holders will need to register the firearm, then have the firearm modified by a gunsmith holding a 'prohibited' endorsement enabling them to undertake this work.
- The gunsmith using the declaration form provided to them by the licence holder will make the magazine compliant. Te Tari Pūreke will then validate the declaration.
- 0.22 rimfire rifles that licence holders have had modified prior to this policy change can also be considered. The licence holder will need to provide the same declaration from and use a qualified gunsmith to confirm the previous work modifying the tubular magazine is compliant.
- **Anyone in Te Tari Pūreke interacting with licence holders with these 0.22 calibre firearms should be advising them to register their currently prohibited firearms as the first step.**

What's the issue?

- Law changes after the 2019 terror attacks placed limits on magazine capacity. These changes meant 0.22 calibre firearms (lever, bolt, and pump actions) with non-detachable tubular magazines of more than 10 rounds became 'prohibited' at this time.
- A number of licence holders have recently tried to register 0.22 calibre rimfire rifles with prohibited high-capacity magazines.
- These 0.22 cal firearms would not be prohibited but for the magazine capacity. Other than being in possession of these firearms, licence holders are 'fit and proper'.
- To assist these licence holders becoming legally compliant, Te Tari Pūreke is introducing a modification pathway.

What we need you to do right now

- Any firearms currently held by Police that are rimfire .22s rifles (lever, bolt, or pump action), **are not to be destroyed** and are to be retained.
- Anyone in Te Tari Pūreke interacting with licence holders should be **advising them to register their prohibited firearms as the first step**. In registering their firearms, the opportunity will be offered to licence holders to consider the modification pathway.

See 'Everything you need to know' on the next page for more about this policy change.

Where you can find the policy

- A copy of the policy update has been added to the Endorsements and conditions Police Instructions chapter, available here: <https://tenone.police.govt.nz/pi/police-manual/c/arms/endorsements-and-conditions#policy-on-managing-non-prohibited-firearms-with-non-detachable-tubular-prohibited-magazines>.

Everything you need to know...

What firearms is this policy change affecting?

Rimfire 0.22 calibre rifles (lever, bolt or pump action) with non-detachable tubular magazines with a capacity of more than 10 rounds.

Are these firearms currently prohibited?

Yes. Law changes after the 2019 terror attacks placed limits on magazine capacity. These changes meant .22 calibre firearms (lever, bolt, and pump actions) with non-detachable tubular magazines of more than 10 rounds became 'prohibited' magazines at this time.

What is changing at this time?

To assist these licence holders becoming legally compliant, Te Tari Pūreke is introducing a modification pathway. Licence holders will be able to have modified their prohibited tubular magazines – those holding more than 10 rounds – allowing these firearms to be retained as a non-prohibited firearm.

Do licence holders have to choose modification?

No. Licence holders have some other choices. They can also:

- Surrender the firearm to the crown for destruction
- Seek an Heirloom/Memento endorsement and permit (having met the criteria)
- Seek a Collectors endorsement and permit (having met the criteria).

Are already modified 0.22 firearms covered by this policy change?

Yes. Licence holders who have previously modified their 0.22 rifle prior to this policy change will also be able to have these modifications considered. The licence holder will need to get a declaration from a qualified gunsmith that the previous work modifying the tubular magazine is now compliant.

What must licence holder do if choosing modification?

Licence holders must first register the firearm. On being contacted by Compliance Team, they will need to get the firearm modified by a gunsmith holding a 'prohibited' endorsement enabling them to undertake this work. The gunsmith will complete the declaration the magazine is compliant. Compliance will receive back the declaration form from the licence holder and update the AIS firearm record.

What specific modifications are gunsmiths required to make?

Modifications can include removing the magazine inner tube; removing the magazine completely; or modifying the magazine inner tube to accept only 10 rounds or less.

Will any of the costs be met by Te Tari Pūreke?

No. It is the licence holder's responsibility to meet any costs associated with making their firearms compliant.

Is there an official declaration form?

Yes, a declaration form has been created for licence holders. They must provide this to the gunsmith they are using. The licence holder will need to return the completed declaration form to Compliance.

What does the declaration do?

The Declaration completed by the gunsmith confirms that either the firearm had already been modified and details the work previously undertaken; or it will describe the work now undertaken by this gunsmith to make the firearm's magazine non-prohibited.

Is this change consistent with the Arms Act?

Yes. there is nothing in the Act or Regulations that prohibits discretion to allow a modification to make the licence holder's firearm compliant.

What do our people need to do first?

Anyone in Te Tari Pūreke interacting with licence holders with these 0.22 calibre rimfire firearms should be advising them to register their currently prohibited firearms as the first step.

Any firearms currently held by Police that are rimfire 0.22s rifles (lever, bolt, or pump action), are not to be destroyed and are to be retained.

What happens when the Registry and Services Team (RST) is informed?

On RST becoming aware the firearm fits the parameters of having a high-capacity magazine (identified through the FRT), RST will assign an event to Compliance.

Is the Registry the only pathway for modification?

Yes. It remains unlawful for a licence holder to be in possession of these firearms outside the prescribed process, and they are subject to criminal and/or regulatory processes.

The only pathway to remedy the non-compliant firearm is through registration in the Firearms Registry. The declaration form is not being provided outside of event management through the RST.

What is the Compliance Team's role?

The National Compliance Team will contact the licence holder and through discussion explain the options being offered.

On the return of the Declaration, and the firearm magazine being confirmed as non-prohibited, the firearm's details are changed in AIS and shown as non-prohibited. The event would be closed.

What happens to the declaration form?

The Declaration will be attached to the event which is attached to the FLH held against the licence holder in the Registry.

Have firearms dealers and gunsmiths been told about this change?

Te Tari Pureke will be contacting firearms dealers and gunsmith networks to make them aware of this change.

What about those firearms of this type that were surrendered and have been destroyed already?

There is no compensation available for those items destroyed prior to the change in policy.

We are here to help

For any questions about this policy you should contact:

- **Michael Tarttelin** - National Compliance Team Compliance Services

Policy on managing non-prohibited firearms with non-detachable tubular prohibited magazines

This section provides staff with guidance on how to manage the unlawful possession of non-prohibited firearms that have prohibited non-detachable tubular magazines attached to them.

Important: This section applies only to licence holders who have complied with their Registry requirements and have unintentionally or mistakenly found themselves in unlawful possession of the prohibited item. Licence holders who approach Te Tari Pūreke proactively or who interact with our staff, must be directed to register their firearm in the first instance. The Firearms Compliance Team will then contact them in due course.

The intention with this policy is to enable licence holders who have attempted to do the right thing in the Registry and who have tried to comply with the law as they understood it, to become compliant.

If a licence holder has knowingly and willingly not complied with the law, or has not entered their firearm in the Registry, then this guidance does not apply to them.

This policy will help reduce the number of prohibited magazines/firearms in New Zealand by:

- engaging directly with the affected licence holders and educating them
- allowing for modification of prohibited non-detachable tubular magazines on certain firearms that would otherwise be non-prohibited firearms
- more readily considering licence holders for prohibited endorsements (either collector or heirloom/memento endorsements) so that licence holders may retain items that are important to them.

The broad policy approach, which has been to consider applications on a case-by-case basis, remains in place.

Modification of unlawfully held prohibited non-detachable tubular magazines that render the firearm prohibited

If a licence holder possesses a non-prohibited firearm equipped with a non-detachable tubular prohibited magazine, then we can consider allowing the licence holder to seek modification of the prohibited magazine by a licensed dealer gunsmith, to return the firearm to being wholly non-prohibited.

This approach must only be used for 0.22 or lower rimfire rifles that are not prohibited in themselves (i.e. bolt action, lever action or pump action rifles), but that have non-detachable tubular magazines where the magazine capacity is greater than 10 rounds.

Under no circumstances are the following items allowed to be modified using this policy approach:

- unlawfully held rimfire or centrefire semi-automatic rifles
- unlawfully held centrefire pump action rifles
- unlawfully held semi-automatic or pump shotguns
- any other firearm (restricted weapon, pistol etc)
- detachable box magazines or any other types of magazines

To be lawful, modification must be undertaken by a licensed dealer gunsmith (who should first obtained a permit to possess) in a way that ensures the firearm and magazine is permanent and irreversibly no longer prohibited.

Only once the declaration is received by Te Tari Pūreke can the licence holder's firearm be changed to 'non-prohibited' in the Registry.

There will be no compensation for licence holders who opt for modification. Any costs must be met by the licence holder themselves, and Te Tari Pūreke or Police will not be responsible for any damage or loss of value due to the modification.

Note: The licence holder also has the option to surrender the firearm to the Crown for disposal or destruction. See '[Surrendering for disposal without compensation](#)'.

Managing licence holders who have already modified their non-detachable tubular magazine

There may be licence holders who modified their non-detachable tubular magazine without us knowing at the time. As these cases come to light, the Firearms Compliance Team should be advised of these cases, and they will manage these cases. The licence holder must work with a licensed dealer gunsmith to ensure their firearm is examined and any modifications made are certified by that gunsmith, who together with the firearms licence holder will fill in a declaration that the modification was permanent and irreversible. Photographs of the item may be requested.

Only once the declaration is received by Te Tari Pūreke can the licence holder's firearm be changed to 'non-prohibited' in the Registry.

Note: The licence holder also has the option to surrender the firearm to the Crown for disposal or destruction. See '[Surrendering for disposal without compensation](#)'.

Considering endorsement applications for unlawfully held prohibited firearms or prohibited magazines

If a licence holder is in unlawful possession of a prohibited firearm or a prohibited magazine that cannot be modified or that they do not want to modify, then another approach is to consider an application from that licence holder for a prohibited endorsement.

The Firearms Compliance Team may initiate an application from the licence holder. The application will then follow its usual process, with the below taken into account:

There are only two capacities that will be considered - a bona fide collector or a memento or heirloom.

The person must meet the criteria of a bona-fide collector to be considered for this endorsement. Do not issue a bona-fide collector endorsement to a person who does not satisfy you that they are a bona-fide collector. This endorsement must not be used solely for the purpose of allowing the licence holder to retain the prohibited item.

If the licence holder is already a bona fide collector of pistols or restricted weapons, then they could be more readily considered for this endorsement.

If the licence holder is already the holder of a prohibited endorsement, then they could be more readily considered for a permit to possess.

If the licence holder has not been an endorsement holder previously, then the memento/heirloom endorsement may be the most appropriate endorsement. For the memento/heirloom endorsement, a licence holder should only be seeking to retain one or two prohibited items that have personal significance to them.

During interviews with any licence holder in this situation, they must be made aware of the seriousness of their unlawful possession of the prohibited item.

- If the licence holder was genuinely not aware they held a prohibited item, then the endorsement may be issued, assuming the licence holder meets the other applicable criteria for the endorsement.
- However, if the licence holder knowingly and willingly unlawfully possessed a prohibited item since the 2019 buyback and legislative changes, this must be factored into the assessment.

Note: The licence holder also has the option to surrender the firearm to the Crown for disposal or destruction. See '[Surrendering for disposal without compensation](#)'.

Surrendering for disposal without compensation

For licence holders who were in unlawful possession and the final decision is to require seizure or surrender, or the licence holder opts to surrender once we have come into possession of the prohibited item, it must be disposed of in line with the [‘Disposal and destruction of non-Police firearms’](#) Police Manual chapter. It must be made clear to the licence holder that they are surrendering for disposal or destruction without compensation.

For further information, see the guidance document on seizure and disposal and voluntary surrender and disposal, which is available on the Firearms Hub [here](#).

Surrender is the only option if the person is not a licence holder.

If a person is not a licence holder and is unlawfully in possession of a prohibited item, the prohibited item must be surrendered to Police or to a dealer (who must then surrender it to Police within 5 working days).

Recording of decision making and outcomes

It is important that the following information is properly recorded in NIA on the relevant Firearms Event:

- summaries of any verbal conversations with the licence holder
- decision making process and how it fits in with this policy. If policy guidelines are not followed, this should be explained, and reasons given for the departure from policy
- reason for the final decision and outcome. If a recommendation for a decision was made and the decision-maker did not accept it, the reasons for the decision should be recorded, together with any new or different matters that were considered.

All forms, certificates and email chains should be attached to the Firearms Event.

Withheld - outside of scope of request

From: [MCILRAITH, Michael \(Mike\)](#)
To: [BAIRD, Peter](#); [WILSON, Richard \(RJ\)](#); [COLEMAN, Peter \(Pete\)](#)
Subject: RE: prohibited A cat .22's progressing the ALT paper
Date: Wednesday, 18 June 2025 11:57:13 am
Attachments: [image002.png](#)
[image003.jpg](#)

Thanks for the update, Pete. Looking positive

Ngā mihi nui,

Mike McIlraith

**Kaihautū Kōtui Tāngata | Director Partnerships & Communities, and
Kaikawe Rautaki, Āheitanga | Acting Director Strategy, Performance & Capability
Te Tari Pūreke | Firearms Safety Authority**



[SEEMail]

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From: BAIRD, Peter

Sent: Wednesday, June 18, 2025 10:06 AM

To: WILSON, Richard (RJ) ; MCILRAITH, Michael (Mike) ; COLEMAN, Peter (Pete)

Subject: prohibited A cat .22's progressing the ALT paper

Morning all.

An early good news story from the ALT paper. Compliance have started the two with streams relating to the prohibited .22's.

One work stream relates to existing .22's surrendered and held in PROP awaiting destruction, Compliance called a halt to the destructions early in the year and are now screening those records, preparing to contact owners with the offer of modification, endorsement or destruction.

The second broader work stream relates to those .22's coming into the Registry and being identified as prohibited.

For the latter, and your interest, from the first day, Reagan Gray (Prohibited Team) called 13 FAL owners last night. Within this cohort, 2 x indicating surrendering and 8 are seeking modification

We intend manually counting the outcomes for both work streams until the backlog is cleared.

Ngā mihi nui

Inspector Peter Baird

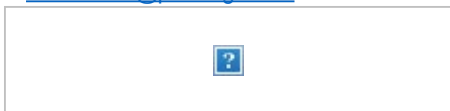
Manager Compliance

Regulatory Compliance and Investigations

Firearms Safety Authority | Te Tari Pūreke

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