



NATIONAL RIFLE ASSOCIATION

Patron: HER MAJESTY THE QUEEN
President: HRH THE PRINCE OF WALES KG KT GCB
Chairman: JOHN WEBSTER
Chief Executive: ANDREW MERCER

Dear Member

Home Office Approved Club – New Fees Proposals

The Home Office has published a consultation which seeks views on the implementation of new fees for firearms licences that are issued by the Home Office including fees for Approval of shooting clubs.

The proposals are based on setting the level of fees at rates that allow full cost recovery; the view of the NRA is that the rates quoted are wholly disproportionate to the actual work required and are either incorrectly calculated or represent fundamentally inefficient processes.

The proposed fee changes are as follows:-

Application Type	Duration	Current Fee	Proposed Fee
Club (grant)	6 years	£84	£1,050
Club (renewal)	6 years	£84	£900
Club Variation (major)		£nil	£690
Club Variation (medium)		£nil	£470
Club Variation (minor)		£nil	£110

Full details of the consultation, fees proposals and impact assessment can be found by following <https://www.gov.uk/government/consultations/firearms-licensing-fees>

Please note the following:-

- (1) The Impact Assessment (page 15) reports a ratio of Home Office (administration) to Police (background checks, interviews, site visits etc.) costs incurred of nearly 6:1. To assert that it costs six times as much to process a two page application form compared to the practical and detailed checks on the ground is astonishing.
- (2) The Impact Assessment gives no breakdown of the actual work flow involved in processing a club application; the cost is calculated by estimating a percentage of the total cost of funding the department. This allows no scrutiny of the efficiency or otherwise of the departmental processes and operations.

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- (3) Variations such as reporting changes in club officers are routine; using the 6:1 ratio per (1) above it surely cannot cost the Home Office £94 to produce a new certificate showing a change of Club name, much less £403 to produce one showing a change of named official to a club officer whose integrity has been checked by the police at a cost of £67, or probably £nil if the officer, as is highly likely, already holds a Firearm Certificate.
- (4) In the proposed fees it is suggested that the cost of varying an Approval to take account of new storage location is £470. Since the police, under best-practice full-cost recovery principles already assessed and agreed, can issue an entire Firearm Certificate which must involve background checks on an individual and assessment of security of firearms storage, for £88, what is it that the Home Office are spending the other £382 on?
- (5) The NRA has 881 affiliated organisations of which 484 are Home Office Approved Clubs. The Home Office has estimated there are 434 Approved Clubs; this means that the fees proposed will over-recover costs by around 12%. The fact that the Home Office cannot provide an accurate count of the number of Approved Clubs does not reassure us that their systems and records are either efficient or cost-effective.

Furthermore

- (1) Rifle clubs are diverse organisations; many shoot full and small bore rifles but only need Home Office Approval for their full bore shooting activities. In total the NRA represents 881 clubs, schools and associations that have a combined membership of 53,000.
- (2) Home Office Approval (HOA) is primarily sought by our clubs to provide access for members to club rifles; it is also a condition required by the MoD to book their ranges where much of the full bore shooting is conducted. Membership of a HOA club is the legal requirement to secure the grant of a FAC for target shooting; reducing the number of HOA clubs would significantly reduce the opportunities for many to enjoy full bore shooting.
- (3) Access to club rifles is critical for the training of probationary members and allows the instruction of safe handling, marksmanship, range safety etc. They also provide shooting opportunities to those with low incomes including young shooters.
- (4) The value to the public purse and benefits to public safety of carefully supervised, properly trained shooters that result from the HOA scheme is obvious. Furthermore clubs are also beacons of volunteering excellence, relying upon unpaid members to serve as officers, administer the considerable paperwork, train new probationary members etc. The existence of a substantial network of small clubs is a contributor to public safety; the close personal contact in a club is one of the best measures to weed out those unsuitable for a FAC at an early stage.



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- (5) The proposed increases are simply unaffordable for the vast majority of our clubs; they would lose the rifles and the exemption of the need for a personal Firearm Certificate that allow them to train probationers in safe shooting and would deny the opportunity for young shooters and those on low incomes to enjoy our sport. Many of our clubs have a rich heritage reaching back over 100 years; there would be uproar if they were forced to close their doors because of punitive increases in fees. Most clubs operate on a not-for-profit basis. An average HOA club has 41 full bore shooters and 76 total members; I would expect the HOA fee to be largely funded by the full bore shooters.
- (6) At the NRA, although we consider the proposal grossly unreasonable, we would not be unduly affected with 8,000 members. A university club, on the other hand, with perhaps 30-40 members, would be significantly hit, particularly with a £470 fee, probably every year, to change the named individual on the Approval to be paid on top of the 6-yearly renewal. It is likely that fullbore shooting would immediately become untenable within universities.
- (7) I understand the primary requirements of a HOA Club is to (a) be a properly formed organisation with appropriate constitution (b) have competent and responsible officers (c) have reasonable access to range(s); and (d) provide safe storage for any firearms it holds. Of these (a), (b) and (c) are within the knowledge of the NRA; (d) is readily assessed by the police. We have offered to assist the Home Office in the basic administration of the HOA scheme.

The NRA accepts the principle of the shooting community paying fair fees for services rendered; however we cannot support the current proposals for the reasons above and urge members in general and club officials in particular to respond to the consultation by either [Respond online](#) or Email to: firearmsconsultations@homeoffice.gsi.gov.uk or by writing to : Firearms Consultation, Home Office Drugs and Firearms Licensing Unit, 5th Floor Fry Building, 2 Marsham Street, London SW1P 4DF.

Yours sincerely

Andrew Mercer

Group Chief Executive & Secretary General