



International Gallery Rifle Federation

President: **Dietmar Honersch**

Chairman: **Dale Foster**

General Secretary: **Glenn Gordon**

IGRF Submission Re: Offensive Weapons Bill – Clause 28

Dear Sirs,

I am writing this submission in my capacity as the current chairman of the International Gallery Rifle Federation (IGRF). This is a target shooting organisation with member countries comprising Great Britain, Republic of Ireland, Germany, South Africa, Australia and Zimbabwe, that promotes the sport of Gallery Rifle and oversees international and world championship shoots.

This target sport is undertaken predominantly using lower powered firearms in centrefire ‘pistol’ calibre cartridges and .22 rimfire. I wish to highlight the concerns of the wide community of law abiding target shooters in Great Britain on some elements of the matters raised in this Bill. Our UK partner organisation is the National Rifle Association based at Bisley.

1. Summary

- 1.1 The interest of the IGRF is primarily in target shooting with lower powered, pistol calibre rifles of which a particular type of firearm, the Southern Gun Company lever release action rifle, is potentially affected by this proposal, as such the IGRF wishes to offer some information to clarify what this particular type of firearm is (see section 2).
- 1.2 The proposals put forward do not demonstrate any legitimate, verifiable evidence to suggest that the categories of firearm proposed for prohibition represent any special risk by being held in private ownership, in fact it is abundantly clear from the findings presented in House of Commons Briefing Paper CBP7654 2 Aug 2017 that:
 - 1.2.1 “Rifles have remained the least common non-air firearms type accounting for around 1% of all offences over the period.”
 - 1.2.2 Based upon this document, there appears to be no supporting evidence that any legally owned so called ‘rapid fire rifles’ or indeed .50 rifles have ever been used in any criminal offence in the UK.
 - 1.2.3 Handguns, which were banned from private ownership in 1997 “comprised some 42% of non-air firearms offences”, suggesting that prohibition does not have much effect on restricting those who harbour criminal intent from obtaining such firearms.
- 1.3 It also appears that the impact assessment document as originally published relates solely to the VZ58 MARS type rifle and the figure quoted for compensation purposes applies to the number of that type of rifle in circulation. However, if the Southern Gun Company rifles (between 2000 and 3000 in the UK based upon information from the manufacturer) were to be taken into consideration this would add a substantial figure to the amount required to be assigned to compensation.
 - 1.3.1 Southern Gun Company informs us that they have around £4,000,000 worth of rifles and components in stock alone, before considering the value of the rifles legally possessed by firearms certificate holders for the purposes of target shooting since the introduction of the design in 2008.

- 1.4 Whilst it is understood that there is a process to be followed in relation to the new Bill, I sincerely hope that amendments could be considered to ensure that public safety is maintained without resorting to an unjustified (and expensive) prohibition that would ultimately not address any quantifiable risk and would unjustly discriminate against a law abiding section of society (see paragraphs 1.5 and 1.6 below).
- 1.5 In the event that legislation to restrict these firearms is brought forwards, we would consider the application of 'grandfather' rights for existing owners may be an acceptable alternative to an outright prohibition.
 - 1.5.1 A precedent has previously been set regarding such 'grandfather' rights in respect of what were termed 'self-contained gas cartridge' air weapons i.e. Brococks.
- 1.6 Separate storage of bolt mechanisms – both the SGC Lever Release rifles and .50 type rifles have bolts that are easily removed from the firearm for cleaning and servicing.
 - 1.6.1 As the primary concern is for these types of rifle appears to relate to them falling into the 'wrong hands', a requirement to store and transport the rifles with the bolt mechanism removed would render them inert, as replacement parts could not be readily sourced or fabricated.
 - 1.6.2 Although not having direct experience with the VZ58 MARS rifle, it is likely that the bolt mechanism should also be readily removable on this model as well.
 - 1.6.3 Once removed from the firearm the bolt mechanism could easily be stored in a small safe, separate from the main storage cabinet.
 - 1.6.4 For transportation purposes the bolts are small enough that they could be carried on the person and fitted to the rifle at the range in preparation for use, being removed again for transport at the end of use prior to departing the range.

2. Southern Gun Company Lever Release Action Rifles

- 2.1 This type of firearm was designed and manufactured by Southern Gun Company, a British owned and operated company who are based in the county of Cornwall. The rifles are built at their headquarters near the town of Bodmin, with the business providing full time employment for a number of skilled staff who are residents of the local area.
- 2.2 The lever release action rifles were first developed in 2008 following consultations that such a design was legal and did not breach any relevant legislation. In the years since the design came to market there have been no recorded incidents of any criminal offence being committed or any other misuse of these rifles.
- 2.3 Having consulted with the manufacturer, we have been informed that there are between 2000 and 3000 of the Southern Gun Company lever release action rifles currently in existence in the UK.
- 2.4 A basic variant of the 9mm / .45ACP lever release rifle would cost just under £1580 according to current Southern Gun Company pricing (checked on 6th July 2018), however, the rifles are available with a wide variety of upgrade specifications that the customer can choose from so actual cost can vary to in excess of £3300.
- 2.5 Southern Gun Company also offer a locked breech variant of the lever release rifle in several rifle calibres, the basic cost of these rifles starts at approximately £3530 (checked on 6th July 2018) and, depending on the upgrade options chosen by the customer, can end up at over £5000.

- 2.6 It should be clearly understood that the Southern Gun Company rifles are not and never have been constructed using major operating components that have been modified from those used in an existing semi-automatic type design. All of the major structural and operating components are manufactured from raw materials in the UK in compliance with UK legislation.
- 2.7 The most common variants of these rifles used by UK gallery rifle shooters are in 9mm and .45ACP calibres. To give an energy context the 9mm typically produces between 450 and 550 joules of energy at the muzzle of the firearm, the .45 typically produces around 600 joules of muzzle energy (it should be noted that these figures are with projectiles of a type that can be legally used for the purposes of target shooting in the UK), compare this to a 12 Bore shotgun firing a cartridge containing a 1 ounce shot load (28 grams of shot) which would yield an energy of approximately 1800 joules at the muzzle.
- 2.8 The lever release action, in 9mm and .45ACP calibres, uses a 'blowback' system whereby the gas that propels the projectile also acts upon a breech mechanism, pushing it rearwards, the action of which extracts and ejects the fired case and then the breech locks in the rearwards position. In order to ready the rifle for the following shot, a lever mechanism requires to be operated by the shooters thumb allowing the breech to travel forwards thus chambering a fresh round ready for firing.
- 2.9 The action of readying the rifle to fire a shot is a separate operation that is fully independent of the trigger mechanism. Based upon personal experience, obtained outside of the UK, of using semi-automatic centrefire rifles, I find that the lever release action is significantly slower in its method of operation.
- 2.10 This type of action has some benefits for those of limited dexterity or other physical disability that would otherwise restrict their use of a different rifle design. I have personally witnessed this first hand whereby a member of one of the clubs of which I am also a member has a prosthetic right arm, but, was able to comfortably shoot a Lever Release rifle in a competition match using his left arm to operate the rifle whilst using a rest to support the weight of the rifle.
- 2.11 A number of UK based shooters are planning to use this type of rifle to compete in the 2019 Gallery Rifle World Championships being held in South Africa in October of next year in the individual Gallery Rifle Centrefire Open division. This proposed legislation now jeopardises these plans if an outright prohibition should ensue.

3. Caledonian Classic Arms VZ58 MARS Rifle

- 3.1 In regards of the VZ58 MARS (Manually Activated Release System) rifle as directly named in the original proposals that were published in late 2017, I have no direct first hand experience with this particular action type other than to know it is manufactured outside of the UK and imported into the country.
- 3.2 I am aware that the fundamental difference in the VZ58 MARS action is that unlike the UK manufactured rifles, it uses a double pull of the trigger, whereby the first pull closes the action to chamber a cartridge and a second pull of the trigger fires the rifle.

4. Rifles Producing a Muzzle Energy in Excess Of 13,600 Joules

- 4.1 Whilst the item relating to rifles with a muzzle energy in excess of 13,600 Joules does not directly impact upon the interests of the majority of the shooters in the sport of Gallery Rifle shooting, our fellow target shooting enthusiasts in the Fifty Calibre Shooters Association UK (FCSA-UK) are well placed to offer expert advice on this aspect of the proposals.

5. Bump Stocks – also known as ‘Bump Fire Stocks’

- 5.1 As to the matter of the items known as ‘bump stocks’ mentioned in Clause 28 (3), we are of the opinion that these items have absolutely no legitimate use within the sport of target shooting or any other legal shooting activity in this country.
- 5.2 We consider that these items should not be allowed to be either imported into or manufactured in the UK.

Thank you for your time in considering the points raised in this submission document.

Yours faithfully

Dale Foster
Chairman
International Gallery Rifle Federation