



National Association of Sporting Rifle and Pistol Clubs

Substitution of Firearms under Section 11 Firearms Acts 1925 to 2009

Individuals licensed for firearms on a not infrequent basis require their firearm to be substituted and replaced by a different but similar firearm (like for like). Annex E of the Current commissioners Guidelines makes specific reference to the mechanism whereby a "Like for Like" substitution can be accomplished. *"In this situation, the applicant will not be required to undergo the entire application process again"*

There are many reasons for the requirement to substitute a firearm and these are well established and accepted reasons, for example:

- a. Replacement with a new firearm.
- b. Irreparable damage to an existing firearm.
- c. Technological advances that improve performance of firearm in target shooting.
- d. Suitability of existing firearm for participation in target shooting, enhanced manufacturing technologies and advances in knowledge related to the sport.
- e. Competitive advantage of new developments in firearms technology.
- f. desire to enhance the investment in a particular firearm.

A significant number of our members participate in complete target shooting with restricted short firearms, new entrants to the sport are prohibited from obtaining certificates for short restricted firearms under amendments to the principal act in 2009.

Individuals who have been licensed prior to 2008 for restricted short firearms are privileged to be able to continue to license their restricted short firearms for the purpose of target shooting, however the subject of substitution has become an issue.

The reasons for requiring the substitution of a restricted short firearm are as valid as any other firearm holder seeking a substitution, in some cases the number of rounds of ammunition fired in any one competition can be in excess of 150 to 250, meaning that the particular short restricted firearm can be subject to significant wear and tear.

Technological advances in firearms design places holders of older models of restricted short firearms at significant competitive disadvantage. Continued use of a firearm potentially worn from use may pose a significant health and safety risk to the user and individuals in the vicinity of the firearm when engaged in target practice.

A number of our members have made specific representation to the NASRPC for information on the ability to substitute restricted short firearms, we are aware of a member having been successful in the substitution process having the certificate cancelled. We have been advised that Section 11 of the current Firearms act is relevant in the case of requests for substitutions.

While we accept that primary firearms legislation prohibits new firearms certificates being issued for restricted short firearms, we are of the view that Section 11 of the Firearms Acts 1925 to 2009 places no prohibition on the substitution of an existing firearm regardless of its type. It is important to be clear that any such substitution would make no net increase in the number of restricted short firearms when a substitution has been made on a like for like basis

Declan Keogh.

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NASRPC is a member of Sports Coalition
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