



## MORE RESTRICTIVE AMENDMENTS: MANUFACTURING AND RELOADING

Another issue set out in the Draft Firearms Control Amendment Bill that could potentially impose restrictions on hunters and sport shooters, relate to the **manufacturing and reloading of ammunition**. Reloading is a common and practical routine by thousands of sport shooters and hunters. It provides a **more affordable option and improved accuracy** compared to ammunition that is commercially available. Again, this amendment seemingly targets one of the most responsible and compliant sectors of firearm owners in the country – our members (hunters and sport shooters).

### MANUFACTURING OF FIREARMS AND AMMUNITION



**Section 45** deals with the manufacturing of firearms and ammunition and **prohibits the manufacturing of any firearms or ammunition without a manufacturer's licence**. It is suggested that the section is amended by adding the following subsection.

“(3) It is an offence for any person, except the manufacturer of ammunition to be in possession of equipment designed and manufactured to reload ammunition”.

***Our comment/viewpoint:** Although the amendment is probably meant to focus on commercial manufacturers of ammunition, it may have unintended consequences (especially if linked to section 93 detailed below). Thousands of people could potentially be criminalised overnight should it become illegal to own reloading equipment and/or to reload your own ammunition.*

Controversially, it is proposed that **Section 93** – making provision for every person with a legally licensed firearm **to load his/her own ammunition for the firearms they use** – **is removed from the Act altogether**. Currently, the number of detonators or percussion caps held in possession (slagdoppies) is restricted to 2 400 for most hunters and sport shooters. This proposed amendment will **prohibit reloading**.

***Our comment/viewpoint:** It's clear that the reloading of ammunition will not be allowed in terms of the proposed amendments which – as mentioned above – could criminalise thousands of hunters and sport shooters who already reload. Interestingly, Section 8 added a competency requirement for people to reload, which is absurd since all reloaders are also firearm owners that have already been declared competent to possess firearms. Additional competency would be required for loading ammunition, but nobody would be allowed to reload or even own reloading equipment.*

**Sections 49 and 63** make provision for **administrative fines** to be imposed on manufacturers and gunsmiths for **late applications for licences**. The current act already allows for the levying of administrative fines for late applications, **yet the Police do not impose these fines because they do not accept late application after the licence lapsed**.

***Our comment/viewpoint:** As with renewal of firearm owner and dealer licences the renewal process is often delayed due to the Police's inability to accept and process renewal applications. Therefore, it would be unfair and nonsensical to issue fines if the Police is unable or incompetent to process applications effectively and promptly.*

### AMOUNT OF AMMUNITION ALLOWED

**Section 91** of the act restricts a licence holder to possess **200 rounds of ammunition per licence at any time**. There is **no limit** on the number of rounds of ammunition that **dedicated hunters, sport shooters and professional hunters may have in their possession**.

The proposed amendment intends **to limit the number of rounds of ammunition that an individual may hold per licenced firearm to 100 rounds, in all instances**. However, provision is made for the Registrar to allow, with good reason, dedicated sports shooters, dedicated hunters, accredited training providers, and professional hunters to have more than the allocated (100) rounds of ammunition. In this process, the Registrar should note how frequently the firearm will be used, the level of participation in the activity for which the firearm is registered, the number of rounds used per event, and any other relevant factors.

***Our comment/viewpoint:** The proposed amendments are irrational and nonsensical considering the potential number of exemption applications one could expect from firearm owners affected the most by such a restriction. SA Hunters has more than 44 000 active members of which 16 951 are dedicated hunters and 13 285 are dedicated sport shooters. Each of these members will probably apply for exemption which will create an astounding amount of administrative red tape and frustration. A dedicated sport shooter may fire as many as 4 000 shots and even more in one year. Clay shooting competitions often require 100 clays to be shot with 2 shots available per clay, which may require 200 rounds already.*

#### The actions we will be taking to stop this legislation include:

- Legal pressure on government to drop the proposed changes to the bill
- Challenging anti-firearm propaganda and misinformation
- Explaining why firearm ownership is a civil right for law-abiding citizens
- Giving thousands a voice to challenge and pressure the government through commentary and petitions
- Collaboration with industry stakeholders to amplify our impact