

Dear Sir or Madam:

**COMMENTS / OBJECTIONS AS TO FCA AMENDMENT BILL –  
GOVT GAZETTE No 437 OF 21 May 2021**

**Name and Surname:**

**ID Number:**

**Email Address:**

**Address:**

**Comments:**

**Comment on New Requirement for Competency**

The additional amendments relating to competency certification (section 6, 7, 8, 9, 10a, 102 and 145) clearly sets out to target dedicated hunters, sport shooters and professional hunters. It is a blatant attempt to reduce the rights of legal and responsible firearm ownership and boycotting an industry that contributes millions, to the country's GDP through hunting tourism.

Areas of specific concern include:

- **RELOADING:** The need for competency to manufacture ammunition is a new requirement for people that reload their own bullets. It also infringes on the right to operate and enjoy a hobby or occupation (in the case of a professional hunter). All reloaders are already competent firearm owners. They reload their own ammunition for practical reasons because it is cheaper to do so. In addition, the precision or accuracy of self-loaded ammunition is much better than commercially available ammunition. If it was intended for commercial manufacture of ammunition, it might have made sense – but this seems not to be the case.
- **THE LIFETIME OF A COMPETENCY CERTIFICATE:** Reducing the lifetime of a competency certificate from 10 years to 5 years for Section 15 and 16 firearms, will double the administrative burden on the Police to issue competency certificates. The Police is already struggling to deal with the current backlog. Why compound this work for seemingly no reason? The waiting period for renewal of competence certificates is already longer than 12 months and this amendment will most likely only add to this waiting period.
- **AGE LIMIT OF COMPETENCY:** Not allowing persons under 18-years old to obtain competency in special circumstances will reduce the opportunity for youth sport shooters and hunters to practise their chosen hobby and/or sport.

**Additional  
Comments:**