

SA Jagters- en Wildbewaringsvereniging  
SA Hunters and Game Conservation Association

**Bewaring deur volhoubare benutting / Conservation through sustainable utilisation**

Plot 3, Mountain Drive 7 / Plot 3, 7 Mountain Drive, Derdepoort  
Posbus / PO Box 1952, Montana Park, 0159  
E-pos / E-mail: [admin@sahunt.co.za](mailto:admin@sahunt.co.za) Web: [www.sahunters.co.za](http://www.sahunters.co.za)

Tel: (012) 808-9300  
Faks / Fax : 087 220 2729



Geakkrediteer deur SAPD as Jagtersvereniging: Nr 400001; Sportskietorganisasie: Nr 1300091; Beroepsjagvereniging: Nr 1300124  
Accredited by SAPS as Hunting association: No 400001; Sport shooting organisation: No 1300091; Professional hunting association: No 1300124

29 July 2021

The Civillian Secretary of Police  
Pretoria

Personal Attention: Mr M Ntwana

Dear Sir,

### **DRAFT AMENDMENT BILL: FIREARMS CONTROL ACT 60 OF 2000**

As part of the comments prepared by SA Hunters on the draft Amendment Bill SA Hunters prepared a petition for consideration by members on the purpose of the amendments. The wording of the petition reads as follows:

*Join SA Hunters today to OPPOSE the frivolous additions to sections in the Firearms Control Amendment Bill relating to competency requirements.*

*We oppose the following:*

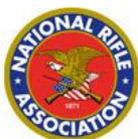
- 1) *The introduction of additional competency certification for specifically dedicated hunters, sport shooters and professional hunters.*
- 2) *The renewal of competency certification every 5 years*
- 3) *The lack of provision for people under 18 to obtain competency certification for the application of a legal firearm*

*The proposed amendments do not only add additional work and admin for both the firearm owner and SAPS, they also blatantly single out dedicated hunters, sport shooters and professional hunters!*

The petition was signed by **9 478** individual signatories in support thereof. Attached hereto please find a full list of all the signatories who as individuals signed the petition.

In addition to the petition provision was created for individuals to also provide some written comments. The comments received are provided in detail below.

1. Johan Prinsloo:  
Hulle wil my nie meer my sport laat beoefen nie en ek het my vuurwapens gekoop met my eie geld waarvoor ek gewerk het. Ander mense mag hulle sport beoefen maar ek mag nie my sport beoefen met iets wat aan my behoort nie. Hoeveel mense is al gedood deurdat hulle met n mes gestek is? Is daar al navorsing daarvoor gedoen. Warm messe ook nou verban?
2. Theodore de Beer:  
The Gov and the Minister should focus their efforts and attention to the REAL problem which is criminals, crime and the criminal element in society. Further to execute their mandate to protect and serve the public interest as opposed to disarming and restricting legal gun ownership. Statistics have shown that the majority of guns used in crimes have been sourced from the SAPS & SANDF and NOT from private gun owners.
3. Jaco Saaiman:  
I am signing because I do not think you are going to get anywhere by complicating an allready complex system that does not work. I am a responsible fire arm owner who has been declared competent to possess a fire arm. licence the person, licence the fire arm. Full stop!!!!



4. Taryn Immelmann:  
Once again the law abiding citizens will be punished in a lawless country whilst the criminals with illegal firearms continue to roam free. Is this our democracy?
5. Johan Botha:  
I have been a law abiding and responsible owner of several firearms licensed into sect. 13, sect 15 and am registered as a Dedicated Hunter with SAHGA. There is no reason for me to relinquish any of my licensed firearms.
6. Charles William Thompson:  
As a dedicated hunter, sportsman and registered taxpayer, why stop my right to promote the game and tourist industry from earning taxes??
7. Don English:  
I strongly oppose these changes! Reasons being. It's not licensed firearm owners who are responsible for violent crime incidents!!! Therefore these proposed changes will have absolutely no effect on violent crime in the RAA!!!
8. Hannes van Eeden:  
Signing because of additional burden placed on law abiding citizens to be dedicated hunter, sport shooters and professional hunters whilst the administration currently cannot be completed in time by SAPF
9. Geoff Holmes:  
I cannot understand why additional competency requirements are necessary, other than to place unreasonable obstacles in the way of legal firearm owners. SAPS cannot deal with the current administrative burden of firearm competency and licensing and this unnecessary amendment will add to that burden.
10. Jacques de Villiers:  
How are law abiding citizens supposed to defend themselves. SAPS is unable to defend the citizens of SA, this is evident with the riots and looting the past week, where the normal legal gun owners stepped in to defend communities. SANDF only showed up after everything happened....and should not be used to police SA citizens, that is the directive of the SAPS. SAPS and this government has failed us on numerous occasions, evident this past week. Thus SAPS have failed to uphold SA citizens rights and failed the constitution of SA.
11. Bernie Jordaan:  
As n belastingbetaler dink ek is dit n moet om ons vuurwapens waarvoor ons betaal het, wettig by ons te hê, nie net vir selfbeskerming nie, maar om te jag ook. Ons loop mos nie en skiet mense op straat nie. Ons gebruik dit in die bosveld 100% van die kere.
12. Chris Notle:  
I am a responsible firearm owner
13. Stephan Terblanche:  
South African Police Service (SAPS) and South AFRICAN National Defense Force (SANDF) can't protect me properly and fast enough as recent looting has shown us. SAPS running out of ammo, not reacting fast enough, relying on legal gun owners to help them protect the community. We have a right to legal firearm ownership.
14. Ian Gibbs:  
When your government plans to confiscate all your weapons... You have to ask yourself, what are they planning? I AM a competent gun owner!
15. Riaan Rossouw:  
The problem is not with the people that gets their firearms legally to protect them self against the criminal. The problem is with the criminals getting it illegally. Police can not cope with current process, how will they cope with additional paper work? Sort out current process and sort out current crime issues.

16. Gert Gimbeek:  
I oppose the new proposal whereby we have to do another fire arm competency and the renewal of licences every 5 years.
17. Chris du Plessis:  
Ek teken die Petisie want ek is n' verantwoordelike Suid Afrikaner en is n' SA Jagters Vereeniging wat elke jaar gaan jag vir vleis en Biltong vir my gesin alleenlik.  
Is ook daar om die voort bestaan van Suid Afrika se wild indialgeheel.
18. Stewart Dorrington:  
Already the burden of legal ownership is too high while criminal elements and corrupt police have easy access to firearms. Police cant manage the current requirements adequately as seen by the backlogs and further restrictions will fuel illegal firearm possession by law abiding citizens
19. Flip Schoeman:  
Die addisionele bevoegdheidsertifikaat sal GEEN impak hê op misdada voorkoming nie
20. Garth Williams:  
I agree with the reasons why we should sign this petition, to much admin, not nessary to renew comptancy every 5 years
21. Andre Botha:  
The current process allow sufficient control for dedicated status. These amendments, apart from being draconian, make it very difficult for dedicated hunters and sport shooters by implementing additional competency requirements which will not have any effect on crime prevention or illegal firearm owners. Further more SAPS are struggling under the current work load, let alone the additional work load these proposed amendments will bring about with absolutely no benefits.
22. Renier Steyn:  
Everthing you want to change will not make any differance in the crime staitistics except for making it higher! You can't handke the applications as is at the moment,now you want to make the expire date 5 years instead of 10 years. How the hell do you want to handle that load of paperwork if you cant handle it now!! If it werent for legan guns and gun owners the looting going on at the moment would have been worse! Dont make us your enemy! Leave our guns alone and start doing your job- fighting crime and catching criminals!
23. Theo Pieterse:  
Why must you get a competency certificate every 5 years, make it every 15 years.
24. Corne Kooij:  
This addition will provide no benefits to either the government in charge of processing these increased requests, that is currently already under massive strain due to an overload and as a result adding additional requirements and renewals will further swamp the system and reduce productivity even more. Neither will it help law abiding citizens in these fields as they currently wait upwards of a year in time for new license registrations or renewals. This will only hurt the economy in these sectors and adversely affect people who make a living in these sectors of the economy
25. Tom Clack:  
After more than 10 years as n responsible fire arm owner and sport-shooter, I proof to be competent! FCR cannot cope with the present renewal system! How can they cope if the work load increase even more?
26. Hendrik du Plessis:  
I am signing because I do Huntington and sport shooting which are Botha internationally recognized. It earns billions for the country and creates thousands of Jobs and is also an olympic sport  
Very few if any of our oganizations members have ever been found guilty or robbery or murders.
27. Chrisjan du Plessis:

I have done all my tests to be declared competent . I am using my firearms in a legal manner and don't need more competency . .

28. Joachim du Plessis:

Lawful gun owner. Not to be limited due to unlawful gun smuggling.

29. Leon Bodenstein:

I have been hunting / using firearms for many years, and know exactly how to use it in a responsible manner. I am a sport shooter and have been hunting for almost 30 years. It would be pointless to have more competencies for people in my position

30. Johan Metchant:

As an active member of the sport and the right to defend my family and non family to the right to live I join this petition saying no to the proposed amendments

31. Nico le Roux:

My firearms are legal and paid for. Look around us. We have to protect ourselves. It is my property. Leave it alone

32. Roger Llewellyn Robert:

It's an impingement on the rights of responsible ordinary law abiding citizens and doesn't address the violence and other criminal acts perpetrated against perceived "soft targets" such as farmers and the elderly

33. Jeff Lopes:

Herewith official opposition to the proposed amendment could afford the protection it was mandated to provide I would have less concern - however with little success by SAPS to manage crime how can you willingly choose to disarm law abiding citizens.

Moreover as a responsible occasional meat hunter - I contribute both personally and through corporate channels to the billions that hunters add to the sustainable game farming and game lodge community! Little thought has once again been given to the loss of livelihoods of so many!

I therefore reject the proposed changes unreservedly and implore government to better engage all stakeholders for a more sustainable and responsible solution.

34. Andre Nel:

The existing legislation is adequate, All that is required is efficient administration thereof.

35. Johannes du Toit:

Do not follow the logic of having to redo competency, especially if dedicated hunters/sport shooters have to log events to retain their status

36. Dries Bekker:

I cannot understand the added value of additional competency certification for specifically dedicated hunters, sport shooters and professional hunters, neither doing that every five years. The SAPS does not supply statistics to prove that competency certification every five years are better than only a once off competency certification. It seems that the quality of proper competency certification is not the overwhelming reason, but rather the frequency.

37. Albert du Toit:

I have a constitutional right to own a fire arm for protection. The current climate in our country with 58 murders per day, staying on a farm, being a possible target of violence necessitate me to have a weapon to protect myself and my family, I am a responsible fire arm licensee and should not be punished because statistics suggest that fire arm owners are not responsible for the safe keeping of their fire arms. Infringement on the right to defend your property and your life cannot be infringement by generalizing based on the conduct of an unknown third party, Crimes are not committed by lawful owners of fire arms, but by illegal acts of criminals who has access to fire arms in the illegal possession - not limited to obtaining it through theft of fire arms from rightful owners, but also obtaining same through selling same on the black market, corruption of state and military in provision

of fire arms as well as negligence of police and military in the safekeeping of fire-arms. Restrictions should be aligned to all forms of corruption and innocent and vulnerable individuals should not be punished for the failure of SAPS and State to safeguard SA against the huge crime influx in the country. This legislation victimise the innocent and will enable more crime..not less crime. This infringement will be a crime against humanity and constitutional rights, de-arming the innocent whilst SAPS/Government fails to protect the citizens. This is an act of communism with a hidden agenda to discriminate and de-arm a group of citizens under the pretense of false interpretation and application of statistic. This change in legislation is like wanting to fire all government officials because many of the government officials are corrupt. Now all government officials should be fired. It is ridiculous and the consequences will stimulate even more violent crimes. The root cause is not the innocent be allowed to own fire arms but rather to fight to high crime rate - by addressing socio economic circumstances, job creation and better policing. This enforcement will have the effect that citizens become negative towards Government, which group of individuals might not give any further support to Government/SAPS but would feel abandoned by their Government and betrayed, Government will disarm loyal citizens. Government does not need this in building a nation. alienate the loyal and law abiding citizens is not the way to earn trust and create a network in which crime is attended to by all.

38. Pieter Britz:

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:

1. 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.
2. 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.
3. 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.

39. Marko Kotze:

All South Africans have the right to own a legal firearm if they have a license and are competent. It is our human right to own it, have it as a self defense weapon AND have it to make us feel safer in a country where crime is running wild.

40. Ben Hertbst:

These amendments, apart from being draconian, make it very difficult for dedicated hunters and sport shooters by implementing additional competency requirements and SAPS are struggling under the current work load, let alone the additional work load these proposed amendments will bring about.

41. Johan Cloete:

Objections to the Proposed Draft Amendments to FCA as Published in Government Gazette No. 44593 of 21 May 2021 (pages 149 to 156)

To whom it may concern (Civilian Secretariate of Police),

As a private firearm owner who has been through the necessary training and has successfully licensed a firearm for self-defense; I reject the proposed Firearms Control Act Amendment Bill 2021 in its entirety and request it be withdrawn. My main motivations and proposals below:

Primary Objection:

The above-mentioned Gazette merely contains bullet pointed summaries of proposed amendments said to be contained in the Bill.

On page 156 of the above-mentioned Gazette: "interested persons and organisations" are being invited to submit written comments on the draft Bill and Socio-Economic Impact Assessment System Report not later than 45 days from date of publication".

The following remains unclear as to how the public will:

- Know where to find the Bill containing the exact draft amendments to the FCA
- Know how to comment on the summaries of the proposed changes said to be contained in the Bill without proper context – which has not been provided in the amendments
- Know where to find the Socio-Economic Impact Assessment System Report on which they are also invited to comment
- Know that the documents which they have been invited to comment on, are the correct documents referred to in the above-mentioned Gazette.

ADDITIONAL AND SUPPLEMENTARY OBJECTIONS:

Objection 1: The Secretariate has not properly fulfilled his mandate of his office.

Comment: The mandate of the Secretariate of police is to enable legislation and to monitor the performance of the South African Police Services. The Secretariate's role is to provide recommendations, legislation, and policy to enhance the performance of the South African Police Services.

Your objects as stated in Section 5 to inter alia: "(d) liaise and communicate with stakeholders; (e) implement the partnership strategy to mobilise role players and stakeholders to strengthen service delivery by the police service to ensure the safety and security of communities".

The preamble to your enabling legislation states: "and whereas there is a need to promote democratic accountability, transparency and openness within the police services and to ensure cooperation between the police services and the communities it serves".

Proposal: Outside of the state entities; there was no stakeholder involvement with the firearm community. Firearm stakeholders outside of the state entities should be afforded the opportunity to comment and contribute to possible amendments before amendments are put forward for public comment.

Objection 2: I object to and strongly oppose the proposed amendment as stated in: "2.15 Clause 15 2.15.1". Clause 15 seeks to repeal sections 13 and 14 of the Act.

Section 13 provides for a license to possess a firearm for self-defense purposes. The consequence of the repeal of section 13 is that the Registrar may not issue a license to any natural person who identifies the need for a firearm for self-defense.

Comment: This is not acceptable to me as a law-abiding person living in South Africa where the crime rate is so high - as is reflected in the government's national crime statistics. South Africa is one of the most homicidal nations on Earth, we have among the highest rates of rape and sexual violence in the world, and our murder rate has increased every year since 2011. In October 2018 the National Commissioner of police admitted to Parliament that it is "impossible" for the SAPS to fulfil its constitutional mandate. SAPS Budget cuts over the past several years amounting to billions of Rands also raises serious concerns for South African citizens. The citizens of our republic are truly the last line of defense against the scourge of violent crime. They must be allowed to protect themselves.

Proposal: A person who has undergone the necessary training and who has been deemed a “fit and proper person” should be allowed the freedom of choice to own and license a firearm for self-defense.

The Constitution of the Republic of South African Bill of Rights states:

“11. Everyone has the right to life. Freedom and security of the person

12. (1) Everyone has the right to freedom and security of the person, which includes the right— (c) to be free from all forms of violence from either public or private sources.”

If the state removes this option as a last line of defense, they take away our right to security and threaten our right to life. I believe that this amendment is in contradiction of the constitution of South Africa.

42. Kobus du Toit:

1. I strongly oppose the new amendments to the fire-arm control act.

"I believe that suggested changes are unconstitutional and will only give more opportunity for criminals to subject common citizens to continued violence.

2. Applications for self-defence should not be limited but rather encouraged. Offenders fear, trained, armed citizens with legal guns for personal protection.

No legal gun owner obtain a fire-arm with the intention to kill somebody. Instead during all stages of our training we learn to estimate the situation and use the minimum necessary force. Criminals withdraw when they meet resistance. Well armed, trained and educated common citizens are a definite deterrent for criminality.

3. Reloading of ammunition is a hobby performed by dedicated sports shooters. The reloaded ammunition are not self-defense rounds but practise and hunting ammunition.

Reloading of ammunition encourages sport shooters to practise and refine their skills.

4. The statistics from the amnesty period clearly indicate that no illegal fire-arms, those with filed off numbers, were handed in.

The so-called illegal arms submitted came from legal owners who failed to renew their licences and just did not have money and dedication to go through the already difficult process to obtain competency and re-licence legal arms.

SAPS and the SANDF does not have the capacity to guarantee the safety of citizens.

5. We should rather amend the firearm control act "to license the person" and "register the firearms". This is similar to the issue of driver's licenses and the purchase of a vehicle.

6. I do suggest that the number of sections can be reduced to simplify the process. Section 15 and 16 can be combined etc.

7. I suggest that membership of a shooting association and regular participation in monthly shooting days should be to one's advantage on renewal. It could even be mandatory at least for owners of section 13, 14 and 20 fire-arms.

8. I suggest that all SAPS and SANDF members should be subjected to the same public competency test and personal licensing as any civilian fire-arm owner under section 13. Duty fire-arms should be registered to a specific member and such member be held accountable for it. SAPS members should be compelled to join a shooting club (membership subsidised by SAPS) and participate in regular, at least 4 times a year, civilian club shooting activities. This could be included in their duty roster.

SAHGCA has a Multidisciplinary Shooting (MDS) discipline which accomodate handguns, S/A rifles and S/A shotguns. The regular participation of local SAPS members at club shoots will create a good liaison and trust between licensed civilian gun users and SAPS members in a particular region.

9. Fire arms should be submitted to forensic testing and recorded on its first registration.

Therefore, a legal fire-arm citizen forced to use the weapon within legal constraints are not disarmed after the traumatic incident, but left with his/her fire-arm to handle psychological effect

of the incident. Forensic records will already be on the system.

Kobus du Toit  
10 Jukskei Street,  
Stilfontein, 2551  
ID 530913 5063 08 9  
SAHGCA Member: 041017

43. Piet Cloete:

The new Firearms Control Amendment Bill will severely impact my ability as dedicated hunter and sport shooter on multiple levels and including number of firearms held for various purposes, number of rounds, reloading of rounds, ability to be proficient, to hunt, to defend my and my family amid rampant crime stats, SAPS ability to curb crime, to partake in sport and more. I totally appose the ne bill as unreasonable and unfair.

44. Ruan Schmidt:

This bill will be in direct violation of Chapter 2, Section 12, paragraph 1 of the Bill of Rights. Freedom and security of the person 12. (1) Everyone has the right to freedom and security of the person, which includes the right— (a) not to be deprived of freedom arbitrarily or without just cause; (b) not to be detained without trial; (c) to be free from all forms of violence from either public or private sources; (d) not to be tortured in any way; and (e) not to be treated or punished in a cruel, inhuman or degrading way.

The government tells the people that owning a firearm for the purpose of self defence is a privilege and not a right. WRONG! Every legal citizen of th Republic of South Africa has the RIGHT to gun ownership for the purpose of self defence. The Minister of Police, Bheki Cele, openly admitted that the South African Police Service has lost its war on crime and that it is unable to maintain law and order in the country. The people's safety and security is now completely exposed by this comment from the minister. The people have no choice but to protect themselves from criminals who want to forfeit the law abiding citizen's right to security and freedom from any form of violence.

THE CRIMINAL WELCOMES this ammendment, because criminals do not care for the law. They do not carry licensed firearms. They have unlicensed and illegal firearms at their disposal. Majority of automatic firearms in the hands of criminals are R4 and R5 automatic rifles. The only 2 sectors that have legal right to carry these firearms are the SANDF and SAPS. No other entity. Which means, in term, the very security departments of our country is SOLELY responsible for these automatic firearms in the hands of criminals. They're incompetence and lack of order results in these automatic firearms to be stolen from their armouries and sold on the black market. Possession of a firearm for the purpose of self defence gives power to us, the people.

1) It lawfully protects all licensed firearm owners from any form of violence in which a life threatening situation is imminent.

2) It lawfully empowers communities to protect themselves, their property and the lives of their fellow neighbours in cases where life threatening situations may occur.

3) It lawfully protects the people of the Republic of South Africa against political oppression, when a government violates the peoples' constitutional rights for political or personal gain.

More people should engage in lawful gun ownership, because the state has failed to protect the people as per their service oath and uphold their constitutional rights.

If progressive entities feel forfeiting people's right to lawfully own and carry a firearm for the purpose of self defence, then THE STATE SHOULD LEAD BY EXAMPLE AND DENY ALL GOVERNMENT OFFICIALS ANY ARMED SECURITY FROM EITHER PUBLIC OR PRIVATE SECTORS. This includes ALL MINISTERS AND THEIR DOWNLINE STAFF, MEMBERS OF PARLIAMENT AND THE PRESIDENT OF THE REPUBLIC. SAPS and SANDF should also be denied firearms for the purpose of self defence or protection of property from either public or private sector as there will be no more crime according to this amendment. I, WHOLEHEARTLY, REJECT this amendment of the

act as it DIRECTLY VIOLATES THE SAFETY, SECURITY AND COMPLETE SOVEREIGNTY OF ALL CITIZENS of the Republic of South Africa.

45. Herman Kriel:

SAPS cannot even properly police the existing FCA - get that right first before trying to amend legislation to the prejudice of legal firearm owners. Furthermore ownership of movable property (including firearms) is RIGHT, not a privilege - so stop threatening my RIGHTS!

46. Ornelia van Wyk:

I am signing because I will not give up my firearms unless you can prove my incompetence regarding the handling of any of my firearms. I am a legal firearms owner and will stay legal unless you can prove me otherwise

47. Pieter Jacobs:

The government and SAPS have failed to protect us as citizens of SA. I believe that responsible gun owners, that train, can assist in reducing violent crimes and protect themselves and their loved ones. I also believe it to be each person's right to be a responsible firearm owner being it for self defence, hunting or other shooting discipline.  
I oppose the suggested new gun legislation.

I trust you will consider these comments as well as the number of signatories of the petition as part and parcel of the process of the review of the draft bill.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Fred Camphor', with a stylized flourish at the end.

Fred Camphor  
CEO: SA Hunters