

Consultation responses in relation to the acceptance of a copy of the European Firearms Pass

Consultees were asked for their view on allowing a copy of the EFP to be provided, rather than the original, when requesting a visitor's firearm permit – below are the responses we received.

	Organisation	Response	DoJ Comment
1	BASC	BASC agrees with the proposal to allow a copy of an EFP to be submitted for the purpose of processing applications for visitors' firearm permits. This change has already been implemented by the Home Office for England, Wales and Scotland and clearly benefits certificate holders in other EU countries who would otherwise be without their EFP for what can be extended period of time. At a meeting of the NIFCLC in October 2011, BASC called on the DoJ to amend NI legislation to allow a copy of the EFP to be provided, rather than the original, when requesting a visitors' firearms permit. BASC is delighted to see that this proposal has been given consideration by the DoJ and more importantly, that it has been included in the consultation.	Agree with proposal – no further action required.
2	Gun Trade Guild NI	We agree with the proposal to allow a copy of a European Firearms Pass (EFP) to be submitted for the purpose of processing applications for visitors' firearms permits. This change has already been implemented by the Home Office in England and Wales and clearly benefits certificate holders in other EU countries who would otherwise be without their EFP for what can be extended periods of time.	Agree with proposal – no further action required.
3	Countryside Alliance Ireland	CAI wholeheartedly agrees with the proposal. We feel the copy of the EFP is sufficient when obtaining a visitors' firearm permit. In addition, this reduces the risk of the EFP being lost or damaged in transit.	Agree with proposal – no further action required
4	British Shooting	We have supported such a proposal in GB, and would strongly	Agree with proposal – no further

	Sports Council	support it in NI also.	action required
5	Scottish Association for Country Sports	We are fully in favour of accepting a copy of the EFP rather than insisting on the original.	Agree with proposal – no further action required
6	Individual	Allowing a copy of an EFP, rather than the original, to be accepted when processing a visitors' firearm permit for a citizen of the EU is a sensible measure. Doing so will: Not compromise public safety; Reduce PSNI costs by eliminating the need to return an original document to the applicant; Reduce inconvenience for applicants and make the processing of EFPs consistent throughout the UK.	Agree with proposal – no further action required
7	Registered Firearms Dealer	I do agree that a copy of a European Firearms Pass should be sufficient when making application of a visitors' permit, but as previously stated I would question the necessity for Visitors' Permits for our neighbours from the ROI.	Agree with proposal EC Directive 91/477/EEC provides for anyone travelling with a firearm from any member state to another, including the Republic of Ireland to Northern Ireland, to do so with authorisation. In Northern Ireland the authorisation is by way of a visitors firearms permit. We consider that making a different arrangement for the Republic of Ireland would go against the policy behind the Directive 91/477 on the harmonisation of laws on the possession and acquisition of firearms within the European Community.

8	Clay Pigeon Shooter	This proposal makes sense and is already supported by Home Office. The only difficulty is that photocopies should be clear and legible not only to make reading them easy but also it may be possible to detect signs of alteration. This would need to be communicated to potential visitors.	Agree with proposal
9	Registered Firearm Dealer	I would be in agreement that copy of a European Firearms Pass would be sufficient when applying for a Visitors' Permit. However I question the need for a Visitors' Permit for residents of the Republic of Ireland. I feel that their domestic Firearm Licence accompanied with an original EFP should be all that is required.	Agree with proposal See response at No7
10	Registered Firearms Dealer and Gun Club Member and firearms coach	Proposal to allow a copy of EFP on application for a visitors' permit from EU citizens. It would also be very helpful if form 30/38 was amended to include a reminder to supply the EFP or a copy. Currently it only asks for copies of domestic FACs and can result in applications being rejected unnecessarily. Agreed.	Agree with proposal We will pass the suggestion regarding the form to PSNI
11	Firearms Club Member and coach	Proposal to allow a copy of EFP on application for a visitors' permit from EU citizens. Agreed.	Agree with proposal – no further action required
12	Individual	I would agree totally with this proposal. There is no justification for not following the logical path taken by the Home Office. As for the costs associated with the production of these certificates, I would suggest that as is European Law, once again, it is the general public (the tax payer) who should pay rather than the FAC applicant.	Agree with proposal – no further action required. The cost of providing for the European Firearms Passes have been calculate but will not be passed on to Firearms Certificate holders they will be met by PSNI.
13	Ards Borough	The Council believes that the original Firearms permit should be	Disagrees – no reason provided

	Council	provided, rather than a copy.	
14	Ulster Clay Pigeon Shooting Association	UCPSA would support this proposal.	Agree with proposal – no further action required
15	Individual	Absolutely not as this permit is currently issued free of charge by the relevant licensing authority; I am of the belief that an original is always preferable to a copy, which could easily have its contents altered during the copying process if some so wished. I would further like to state that I would urge the introduction of a mandatory course for new applicants, which would have to be passed before a certificate would be issued, covering topics like (a) safe handling, (b) safe directions, (c) backstops, (d) the law on the use of firearms and (e) how to safety store firearms and ammunition. This I believe would be greatly beneficial to good practice for those owning firearms.	Disagrees Concerns about the alteration of the copy of the EFP will be passed to the Chief Constable. The introduction of a mandatory course before issuing a certificate will be considered as part of the consultation responses on firearms fee and other miscellaneous amendments
16	Alderman George Robinson MLA	Absolutely not as this permit is currently issued free of charge by the relevant licensing authority; I am of the belief that an original is always preferable to a copy, which could easily have its contents altered during the copying process if some so wished. I would further like to state that I would urge the introduction of a mandatory course for new applicants, which would have to be passed before a certificate would be issued, covering topics like (a) safe handling, (b) safe directions, (c) backstops, (d) the law on the use of firearms and (e) how to safety store firearms and ammunition. This I believe would be greatly beneficial to good practice for those owning firearms.	Disagrees Concerns about the alteration of the copy of the EFP will be passed to the Chief Constable. The introduction of a mandatory course before issuing a certificate will be considered as part of the consultation responses on firearms fee and other miscellaneous amendments
17	Northern Ireland Deer Society	We agree that a photocopy of the EFP should be acceptable as the original will, presumably, be checked for validity on entry to NI. We also believe that the EFP should be acceptable for Irish citizens	Agree with proposal

		transiting through Northern Ireland enroute to GB or further afield on hunting trips without the need for a visitors' permit if there is no intention to use their firearms in Northern Ireland. This we believe is in line with the rest of Europe.	
18	PSNI	The Chief Constable would support the use of a copy of the European Firearms Pass in line with the process being used in Great Britain.	Agree with proposal – the Chief Constable has raised no concerns
19	North Down Borough Council	North Down Borough Council would not support any relaxation of firearms laws.	Disagrees – no reason provided
20	Individual	Agrees with the other points proposed in consultation.	EFP was one of the points raised so have taken this comment as agreement to the proposal.
21	Individual	I am generally in favour of the proposals relating to European Firearms Pass.	Agree with proposal – no further action required
22	The Gun Trade Association	<p>The procedure in Great Britain for visitors who require a visitors' permit and who hold a European Firearms Pass has been modified to allow the presentation of a copy of the EFP rather than demanding that the original be submitted. It is understood that the change has been brought about by administrative means and no legislation was required. The proposal to implement the same change in Northern Ireland is to be welcomed.</p> <p>The review currently out at paragraph 14.2.6 that no charge may be made for a European Firearms Pass but it calculated in the review that the cost to the police of issuing these passes averages £3,176 per year. The proposal to achieve recovery of full costs of providing a firearms licensing regime means that the cost of the EFP must form part of the total sum and the intention is to recover the money from holders of firearms certificates whether or not they</p>	<p>Agree with proposal</p> <p>The acceptance of a copy in Great Britain required a legislative change the Regulation that provided for the change are the Firearms (Amendment) Act 1988 (amendment) Regulations 2011 (S.I.2011/2175)</p> <p>The cost of providing for the European Firearms Passes have been calculated but will not be</p>

		require the EFP. It is unfair that this money be acquired from all certificate holders and it may be that to demand a fee indirectly contravenes the EC Directive.	passed on to Firearms Certificate holders they will be met by PSNI.
23	Registered Firearms Dealer	Has had sight of and agrees with response number 9 and is aware of the reasoning and direction of the Countryside Alliance response number 3.	Agree with proposal.
24	Ulster Angling Federation	Agrees with the Countryside Alliance Ireland response number 3	Agree with proposal.