

24 June 2024

Harm Reduction and Public Safety
Policy Group
Ministry of Justice | Te Tāhū o te Ture
Justice Centre
19 Aitken Street, Thorndon
DX SX10088
Wellington 6021
New Zealand

By email to: firearms@justice.govt.nz

Tēnā koe,

Re: A New Approach to Regulating Shooting Clubs and Ranges

[The Royal Australian and New Zealand College of Psychiatrists \(RANZCP\)](#)¹ and [Tu Te Akaaka Roa, The New Zealand National Committee \(NZNC\)](#)², welcome the opportunity to provide feedback, as part of focused consultation with members of the Police's Arms Engagement Group, on the Government's draft proposals for regulation of shooting clubs and ranges. We have taken time to consider the discussion document and present our position on the matter below.

The RANZCP is a membership organisation that prepares doctors to be medical specialists in the field of psychiatry, supports and enhances clinical practice, advocates for people affected by mental illness, and advises governments on mental health care. The RANZCP is the peak body representing over 8400 members in Australia and New Zealand and is guided on policy matters by a range of expert committees. Our response is informed by consultation with RANZCP members who have expertise in firearms and mental health.

Psychiatrists play a role within firearms regulation in New Zealand as health practitioners under the [Arms Act 1983](#)³. As such, psychiatrists:

- May be requested by the Police to provide their professional view on the mental health of a patient who has applied for a firearms license.
- Are advised by the Police if a patient has been issued a firearms license.
- May notify the Police if they consider that a patient with a firearms license is currently a risk to themselves or others because of their mental health and should therefore not have access to firearms.

As outlined in the RANZCP's [Professional Practice Guideline 23: Firearms Risk Assessments](#)⁴, when providing requested information to the Police or notifying them of concerns, psychiatrists consider the risks of a patient being issued, or continuing to hold, a firearms license, on a case-by-case basis. Psychiatrists can only assess this risk based on

the patient's mental state at the time of the request or notification, and with the information available to them. They also consider the impact preventing or removing access to firearms may have on Māori, for whom firearms may be necessary to undertake cultural practices such as hunting and land management activities. The social importance of firearms for members of shooting clubs and ranges is considered as well.

The NZNC acknowledges the Government's aim of reforming firearms regulation to support licensed firearms owners to possess and use firearms, while ensuring public safety. However, we raise concern about the proposals to:

- Replace the current approval process for non-pistol clubs to operate with an enrolment process.
- Replace the current certification process for non-pistol ranges to operate with standing orders and a system of self-regulation.

Approval and certification of clubs and ranges were introduced to establish greater flow of information about firearms use and users to the Police⁵. Decreased regulatory oversight by the Police increases the risk of firearms misuse going unnoticed. Responsibility should be shared by the firearms-using community, medical professionals, law enforcement, and firearms regulators, to increase capacity to identify and prevent the misuse of firearms. Regulation should enable these groups to work together to enact firearms safety collaboratively.

References

1. [The Royal Australian and New Zealand College of Psychiatrists](#)
2. [Tu Te Akaaka Roa | The New Zealand National Committee](#)
3. [Arms Act 1983](#)
4. [Professional Practice Guideline 23: Firearms Risk Assessments](#)
5. [A Turning Point for Firearms Regulation: Implications of Legislative and Operational Reforms in the Wake of the Christchurch Shootings](#)

Naku noa, nā



Dr Hiran Thabrew
Chair, Tu Te Akaaka Roa | The New Zealand National Committee