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Submission to go on line to [Arms Bill - New Zealand Parliament](#)

Arms Bill Submission from Fish and Game New Zealand

Consultation closing: 16 February 2026

Executive Summary

Key Positions and Recommendations:

- **Support for Core Principles:** Endorsement of the Act's purpose to promote safe firearm use and prevent criminal misuse, while ensuring privileges are not unreasonably denied to fit and proper individuals.
- **Definitions and Terminology:** Agreement with clear definitions (e.g., ammunition) and the shift from "prohibited" to "restricted" firearms for accuracy.
- **Licensing Provisions:** Support for minimum age of 16 for licences, mentoring provisions for supervised use, and pragmatic licence durations (5 years for new applicants, 10 years for renewals).
- **Fit and Proper Criteria:** Endorsement of Wildlife Act compliance as part of suitability assessments, with caution against excessive punitive measures.
- **Regulatory Powers:** Recommend extending enforcement powers under Clauses 73 and 249 to include Constabulary Police alongside Arms Regulator officers to avoid operational gaps.
- **Visitor Licences:** Support for up to one-year visitor licences to facilitate repeat hunting trips, benefiting tourism and the economy.

- **Organisational Firearms:** Advocate for recognition of organisationally owned firearms in the registry to improve security and compliance.
- **Alcohol and Firearms:** Suggest introducing enforceable alcohol limits similar to driving laws for clarity and safety.
- **Cost Recovery:** Support periodic reviews but urge fees remain fair, linked to CPI, and partially funded by government due to public good aspects of hunting.
- **Consultation on Restrictions:** Oppose unilateral classification changes without public consultation, particularly regarding semi-automatic and pump-action shotguns essential for game bird hunting.
- **Clubs and Ranges:** Support streamlined enrolment processes for non-pistol clubs and ranges to encourage safe training environments.

Fish & Game also highlights its enforcement role under the Wildlife Act and collaboration with Police and the Firearms Safety Authority, reinforcing the need for a workable Arms Act that supports compliance, safety, and responsible firearm use.

We thank the select committee for the opportunity to submit on this bill. We welcome the opportunity to present to you in person and answer any questions that you have.

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on behalf of

Richie Cosgrove, COO

New Zealand Fish and Game Council

Attachments

Attachment 1 - About Fish and Game

Introduction

1. This submission is made by the New Zealand Council of Fish & Game New Zealand, on behalf of all Fish & Game Regions. We support a new rewritten Arms Act which enables law-abiding fit and proper persons to own, possess, and use firearms and which enhances public safety, allowing those people who hunt and shoot to do so safely, efficiently and without unnecessary bureaucracy and cost.
2. This submission relates to matters most relevant to Fish & Game licence holders, specifically game bird hunters, and to Fish & Game Councils' compliance and law enforcement work.

Fish & Game organisation

3. Fish & Game is a statutory body established by Parliament under the Conservation Act 1987 to manage, maintain, and enhance freshwater sports fish and game birds and their habitats throughout New Zealand in the interests of anglers and hunters. The organisation comprises 12 regional autonomous Fish & Game councils, and the 13th council is the NZ Fish & Game Council, made up of appointees from each regional council. Fish & Game reports to the Minister for Hunting and Fishing.
4. Fish & Game directly represents around 150,000 licence holders. Approximately 40,000 of these are game bird hunting licence holders, i.e., they are recreational game bird hunters. Game bird hunting in New Zealand may only be undertaken with shotguns, by licenced hunters and by landowners, who must also comply with other hunting regulations.
5. Fish & Game has the statutory mandate to manage the following game bird species:
 - a. Black swan.
 - b. Grey duck.
 - c. Mallard duck.
 - d. Paradise shelduck.

- e. Shoveler duck.
- f. Pukeko.
- g. Chukar.
- h. Red legged partridge.
- i. Pheasant.
- j. Australian or brown quail.
- k. Californian quail.
- l. Virginian or bobwhite quail.

Submission Points

6. Clause 3. Purposes of this Act

We agree that the purposes of the Act should be to promote the safe possession and use of firearms, and to impose controls to prevent the possession and use of arms by criminals.

7. Clause 4. Principles

We agree with the principles that the possession and use of firearms is a privilege, and that anyone doing anything with arms must act in the interests of personal and public safety. However, we contend that while possession and use of firearms is a privilege, it is a privilege that must not be unreasonably denied to persons who are found to be 'fit and proper' to be issued a firearms licence, and therefore able to own and use firearms for legitimate recreational activities such as game bird hunting.

8. Clause 5. Interpretation Section. Definition of ammunition.

We are pleased to see that the Act will now define what constitutes ammunition, in that it means material (or item) that comprises Projectile, Propellant, Casing and Primer. This is clear and straightforward.

9. Clause 9. Meaning of restricted firearm.

We agree with the change from the term 'Prohibited firearm' to the term 'restricted firearm' to describe firearms which, while not available to holders of a standard firearm licence, can be possessed and used under specified conditions with appropriate permits or authorisation, for example, semi-automatic centrefire rifles used for pest control. This change more accurately

describes the status of these firearms rather than describing them as prohibited.

10. Clauses 14 and 15. Requirements for possession of a Standard Firearm and defence against prosecution for an offence relating to Clause 14.

Clause 14 outlines that it is a requirement for possession of a Standard Firearm to hold a current firearms licence or a Visitors Licence. We agree with the provisions of Clause 15 that enables a defence against an offence relating to a breach of Clause 14, if the person who does not hold a firearms licence to possess and use a firearm is doing so while under the direct supervision of a firearms licence holder. We agree that this clause does not impose any age restriction on the person who is being supervised. This allows junior hunters or learner hunters, for example, to hunt and shoot game while under the supervision and instruction of an experienced hunter who is a firearms licence holder, and being mentored in the safe use of firearms.

11. Clause 29. Requirement for possession of ammunition.

Much like Clauses 14 and 15, this clause requires a person to hold a firearms licence in order to possess ammunition; however, it also provides a defence against prosecution for a person who does not hold a firearms licence if they are in possession of ammunition while under the immediate supervision of a firearms licence holder. This is fair and pragmatic and enables junior or learner hunters to hunt and shoot game and therefore possess ammunition to do so, while being supervised by a licence holder.

12. Clause 67. Application for Firearms Licence.

We agree with the requirements outlined in this clause for a person to apply for a firearms licence. Specifically, we agree with retaining the age of 16 years as the minimum age for a person to apply. This enables junior hunters to obtain their own firearms licences, and to receive comprehensive safety training and vetting as part of the application process, and if deemed suitable and fit and proper persons, to then be issued a firearms licence and be able to hunt alone while not having to remain under the immediate supervision of a licence holder. In our view, one of the most important aspects of this is

pulling those young people into the mandated safety training processes as part of their application for a firearms licence.

13. Clause 69. Fit and Proper Person requirements.

We agree with the provisions of Clause 69 in relation to defining who is fit and proper to hold a firearms licence. As statutory managers of game birds and game bird hunting, we agree with the situation set out where a person who is charged or convicted of an offence against the Wildlife Act 1953 may be found not fit and proper to hold a firearms licence. This is a powerful incentive for hunters to comply with the Wildlife Act and Regulations made under that Act. We, however, would not like to see this used in an excessively punitive manner without good cause, as many Wildlife Act offences are, or can be, relatively minor. We recognise, however, that in some cases a Wildlife Act offence may be the tip of the iceberg and unknown to us, there may be a raft of other issues relating to that individual, such as a pattern of law-breaking, or anti-authority behaviours. We note that this clause is largely equivalent to the wording of Section 24A of the Arms Act 1983.

14. Clause 73. Conditions of firearms licence: General.

We note this section largely mirrors the current Section 24B of the Arms Act 1983. Within this section are several requirements that are placed on licence holders, which translate into the powers of an Officer of the Regulator. Such as 73(1) (c) that a licence holder must produce any arms items and ammunition that they are carrying to an officer of the Arms Regulator on demand; and in (d) and (e) further requirements to permit inspection of Arms Items, places where they are kept, a requirement to allow entry to places, and to allow inspection of security arrangements in vehicles. In the current Arms Act 1983, these requirements and powers relate to members of the NZ Police. In Clause 73, they simply apply to Officers of the Regulator. The definition of Officers of the Regulator does not include Constabulary Members of Police. We submit that this creates a gap in legislative powers in that there are and will be circumstances where sworn Constabulary members of Police will, in the course of their duties, encounter situations where it is desirable to invoke

these powers and requirements of licence holders. Still, under the wording of Clause 73, they will not be able to do so. We submit that this clause should be amended to also include Constabulary members of NZ Police alongside Officers of the Regulator in relation to those powers and requirements.

15. Clause 76. Duration of Firearms Licence.

We agree that it is appropriate to continue the current provisions of issuing firearms licences for five years to first-time licence holders, along with issuing five year licences to persons whose previous licence was revoked or surrendered, or whose licence has expired without them applying for a new licence before the expiry date. We agree with issuing firearms licences for a period of 10 years in other cases, such as the renewal of existing firearms licences, where all requirements have been met. This ensures that those people who are issued with 5-year licences can be more easily monitored, while allowing those who have been in the system without any issues and who are deemed fit and proper persons to continue to be able to hold 10-year licences. This minimises bureaucracy and costs.

16. Clause 77. Extension of Firearms Licence for up to 3 years pending the determination of the application of a new firearms licence.

We agree with this clause, which enables firearms licence extensions to be issued. While we would anticipate that this will be seldom used to issue extensions for periods up to the maximum of 3 years, this ensures that there is an ability for licence holders who are compliant with requirements and who have applied in time for a new licence, to receive a licence extension and a reissued licence with the extended expiry date pending the determination of their application so that they can continue to use firearms, purchase ammunition and so forth, including air travel, without impediment. An advantage of this clause is that it assists the regulator in proactively managing licence application workloads, thereby evening out periods when there may be a large number of applications to process, by allowing some applications to be deferred by up to 3 years. This assists in managing the regulators workload in licence applications and renewals, and maintaining the efficiency and integrity of the system.

17. Clause 121 and Clause 130. Visitor licences and duration of Visitor licences.

We agree with the ability for visitor firearms licences to be issued under the conditions set out in Clause 121. Also, that the length of a visitor licence may be up to 1 year to enable hunters to have repeat visits to New Zealand during that one year period, for instance, to hunt waterfowl in different Fish & Game regions where there is a longer season length. Around 1000 game bird hunters each season are international visitors, so the ability for these hunters to obtain a visitor's firearms licence enables them to repeatedly visit and hunt, and is beneficial to the economy.

18. Clause 123. Fit and Proper Person to hold a visitor's licence.

This clause mirrors clause 69. We agree with the conditions as set out.

19. Clause 171. Approved Ammunition sellers.

We agree with the proposal that a person who is a firearms licence holder but does not hold a business licence may apply for approval to operate a business to sell and supply ammunition. This ensures less bureaucracy for such persons as opposed to having to hold a dealer's licence; they are already firearms licence holders, and under this proposal, they must, in any respect, apply for approval to sell or supply ammunition. Hence, the Regulator is aware of and can approve or decline their application as is appropriate. We also support the status quo, which permits non-commercial sale or supply of ammunition by a licence holder to another licence holder.

20. Clause 218. Non pistol shooting club must be enrolled.

We support simply requiring non pistol clubs to be enrolled. This simplifies the current situation around such clubs and enables those clubs to operate in a non-onerous manner while still allowing the Regulator to be aware of and have oversight of those clubs. Clubs are valuable to train and mentor young and new shooters and hunters, and provide oversight of persons who belong to them. Encouraging clubs is a positive contribution to public safety.

21. Clause 234. Non temporary Non-Pistol shooting ranges must be enrolled.

We agree that Non temporary Non-Pistol shooting ranges must be enrolled, with the process set out as in Clause 236, including that the range has approved standing orders. Such a process is pragmatic and enables the regulator to be aware of and approve ranges and the Clubs that operate them. Ranges are essential for hunter and shooter training, development and mentoring and provide safe locations for shooting. Many game bird hunters are members of clubs and use ranges such as clay target ranges to practice and engage in competition shoots.

22. Clause 249. Person in possession of arms item or ammunition must give identifying information to Police.

While this is an essential clause, it relates only to a requirement for a person in possession of any arms item, or ammunition to give their details to a member of the Police. It does not create a requirement for a person that the clause relates to also give such details to an Officer of the Regulator. The Interpretation definitions in Clause 5 do not define what is a Member of Police, whether that includes both sworn Constabulary members and non-sworn members, or just Constabulary. While an Officer of the Regulator is defined, with the assistance of Clause 306, as a non-Constabulary Member of Police. We submit that this aspect, along with that of Clause 73 as already outlined, needs to be written in such a way that requirements on persons to comply with Clauses 73 and 249 relates to both Constabulary Members of Police and Officers of the Regulator, as there is a crossover in roles and circumstances where they will operate. Both will at times deal with persons who are in possession of firearms.

23. Clause 270. Being in charge of firearms while under the influence of drink or drugs.

This clause mirrors Section 47 of the Arms Act 1983, except that the penalty for this offence is increased. Like the Arms Act 1983 offence, the offence created by this clause is to be under the influence of drink or a drug to such an extent as to be incapable of proper control of the firearm. The problem with this is that this is a subjective test, and it can be very difficult to determine if, in fact, a person is under the influence of drink or drug to that extent. We submit that, in our view, it would be much simpler and much more enforceable

for there to simply be an alcohol level limit in place for persons who are in charge of firearms. The alcohol level limit would have to be determined by experts in this field; however, a suggested starting point would be to equate this to alcohol limits for driving a motor vehicle. And much like the Land Transport Act 1998 provisions, we submit that there could be a parallel alternative offence of being in charge of a firearm while under the influence of drink or drug to such an extent so as to be incapable of proper control of that firearm. This would enable greater enforcement ability depending on the circumstances. It would be useful if lower alcohol level breaches were able to be proceeded against by way of an infringement notice, again, much like the Land Transport Act provisions, but in terms of enhancing public safety, it would be much better than the current situation.

24. Clause 271. Obstructing officer of Arms Regulator.

This clause creates the offence of obstruction of an Officer of the Arms Regulator. This mirrors the old Section 56 of the Arms Act 1983, which relates to obstruction of a member of the Police. However, Clause 271 does not include an offence of obstruction of a member of the Police. As there is a crossover of roles between Police and Officers of the Arms Regulator, and Police are likely to encounter situations where they deal with matters around Arms, it would be useful and at times essential for there to also be an offence relating to a Member of Police. We submit that this clause should be amended accordingly to include Members of Police as well as Officers of the Arms Regulator.

25. Clause 347. Chief Executive to keep arms registry.

We note the requirement for the Chief Executive of the Regulator to continue and maintain the Arms Registry. Some Fish & Game Councils, like some Government departments and local authorities, own and possess firearms which are used for organisational or work purposes, such as animal and pest control by staff who are firearms licence holders. These firearms are generally not assigned to an individual firearms licence holder and may be stored in organisationally owned security at a workplace. The current Arms Act and this Bill does not recognise in any respect firearms which are departmentally or organisationally owned and used by staff. This has implications in areas such

as security, storage and the registry requirements, which we submit also need to be addressed.

Currently, and as this Bill also requires, organisationally owned firearms are required to be registered to staff members who are licence holders, who then have responsibility for those firearms. We suggest that a pragmatic alternative is that statutory organisations such as Fish and Game or departmental firearms such as DOC can be registered to the organisation, with details and firearms licence information of staff who can access those firearms held by the registry. This will then enable the regulator to have a record of where those firearms are stored and to carry out security inspections, and to know who has access to them.

26. Clauses 363 and 364. Order in Council relating to definitions of restricted firearm, restricted magazine and restricted ammunition, and declaring items to be restricted weapons or high-energy airguns.

This clause enables the Governor General, by Order in Council, on recommendation of the Minister responsible after prescribed consultation with the regulators Chief Executive and the Police, (and there is no required outcome of that consultation, simply that there has been consultation) to declare any semi-automatic firearm (except small semi-automatic pistols) or pump action firearm, any magazine and or any ammunition, or any arms item or any airgun to be restricted firearms, magazines or ammunition, (or in the case of an air gun to be a high – energy airgun).

This process can occur without any public consultation and cause those firearms, magazines, or ammunition types, or items to become illegal to a standard firearms licence holder when deemed restricted weapons or restricted items. Because this process lacks consultation with the public and licence holders, we are opposed to this clause. Many game bird hunters rely on and use semi-automatic and pump-action shotguns, and these shotguns already have magazine restrictions under the Arms Act, limiting them to a maximum five-shot magazine capacity. If there was concern at any time about any type of such firearms or items, then there should be a proper process around consultation with firearms licence holders, user groups and clubs to

ensure any changes of classification of firearms or items are made for correct and proper reasons.

27. Clauses 365 – 373. Cost recovery.

We support the purposes and criteria around cost recovery, including a five yearly review of costs. However, we submit that increases in fees levied should be linked to CPI, kept fair and reasonable, and affordable to encourage compliance. The firearms licencing system and associated work of the regulator is a public good. Hunters contribute to pest control, food gathering for families and outdoor recreation is good for public health, as there are proven mental and physical health benefits from hunting and outdoor recreation. We submit that the total costs of the firearms licencing system and the Regulator should not be borne solely by firearms licence holders, but as there is a public good, this should also be shared with the Government or taxpayers. Additionally, the Regulator should ensure they operate as efficiently as possible to keep costs to a minimum.

28. Other Matters – Fish & Game NZ as an enforcement agency relating to firearms.

Fish & Game councils have responsibilities under the Wildlife Act 1953 to carry out enforcement functions in relation to game bird hunters, which often include joint field operations with Police and Firearms Safety Authority staff, checking game bird hunters and their firearms. This gives our staff an insight into the matters that are dealt with by Police and Firearms Safety Authority staff and how their roles and the requirements on firearms licence holders interrelate.

Fish & Game Rangers have powers to seize firearms from hunters who are found to be committing offences against the Wildlife Act. Fish & Game advises the Regulator (currently the Firearms Safety Authority) of the seizure of firearms and consults on the subsequent possession, disposal, or return to hunters of firearms at the conclusion of enforcement or prosecution action. Fish & Game works with FSA to ensure that where hunters are dealt with for

game hunting offences that subsequent assessments are made around the fit and proper test requirements.

As an organisation, Fish & Game advocates for the rights of law-abiding and responsible hunters and firearms users to possess, own, and use firearms recreationally. As well as this, Fish & Game Councils' compliance and law enforcement responsibilities mean that a reasonable and workable Arms Act is important. We wish to see that the Arms Act, which is passed from this bill, is fair, reasonable, and fit for purpose.