

Regulatory Impact Statement: Firearms Reform – Encouraging a culture of community safety and support (1 of 4)

Decision sought	<i>Cabinet decisions</i>
Agency responsible	<i>Ministry of Justice</i>
Proposing Ministers	<i>Hon Nicole McKee, Associate Minister of Justice</i>
Date finalised	29 May 2025

This is the first in a suite of four Regulatory Impact Statements (RIS) containing proposals to strengthen the firearms regulatory system through amending the Arms Act 1983 (the Act):

- *Firearms Reform – Encouraging a culture of community safety and support (1 of 4) – this RIS;*
- *Firearms Reform – Enabling legitimate possession and use (2 of 4);*
- *Firearms Reform – Ensuring compliance through education and enforcement (3 of 4); and*
- *Firearms Reform – Maintaining public interest and safety (4 of 4).*

This RIS focuses on enabling those who wish to undertake legitimate firearms activities (such as hunting, pest control, animal euthanasia on farms, and sport shooting) to be able to do so by encouraging a culture of community safety and support.

Community safety is encouraged by the regulation of:

- *Firearms products:* which are assessed against risk characteristics; and
- *Licensing:* which determines who is considered responsible to use firearms products in a safe manner.

Firearms products

Products are regulated based on level of potential risk, to encourage and support community safety. Proposals in this RIS focus on adjusting the regulatory settings for two particular types of firearms products:

- Part A: Prohibited firearms for sport shooting; and
- Part B: Blank-firing guns.¹

Licensing

¹ A blank-firing gun is anything that resembles a firearm and is capable of firing blank cartridges, but not a shot or bullet, missile or other projectile.

Licensing is the entry point for those who wish to possess and use firearms. This process seeks to ensure that people are responsible, supported and will contribute to a culture of community safety and support. Proposals in this RIS focus on improving the licensing system to uphold public safety and to simplify the process where possible:

- Part C: Gang membership; and
- Part D: Visitors' licences.

Summary: Problem definition and options

What is the policy problem?

Firearms products

Part A: Prohibited firearms for sports shooting: the Associate Minister of Justice (the Minister) has asked the Ministry to provide advice on controls for prohibited firearms. Licence holders with a pistol target shooting endorsement cannot participate in three-gun sport shooting, due to the Arms (Prohibited Firearms, Magazines and Parts) Amendment Act 2019, which restricted the use of live ammunition in semi-automatic rifles with large capacity magazines to pest-control purposes.

Part B: Blank-firing guns: the Ministry of Justice (the Ministry) has identified that blank-firing guns pose a risk to community safety. This is because there are no controls on the possession of blank-firing guns (they can be purchased by anyone) and they can be easily converted into firearms. This has the potential to impact on public safety.

Licensing

The Minister asked the Ministry to consider improvements to the following areas to support legitimate firearms usage and improve public safety:

Part C: Gang membership: there are currently no explicit grounds to automatically disqualify an applicant from obtaining a firearms licence if they are a gang member; and

Part D: Visitors' licences: overseas visitors travelling to and from New Zealand (for example, for shooting competitions or hunting) must apply for a visitor's firearms licence every time they enter the country. Some visitors re-enter the country multiple times during a short timeframe. Requiring these visitors to re-apply is an inefficient process.

What is the policy objective?

The overarching policy objective of the Firearms Reform Programme is a firearms regulatory system that:

- supports the safe possession and use of firearms and other weapons for legitimate purposes (e.g. sport, hunting, collecting, and pest control); and
- imposes controls that protect individual and public safety from firearms-related harm.

Firearms products and licensing

The policy objectives specific to firearms products and licensing are:

- that firearms products are appropriately regulated, relative to the characteristics of the product, to mitigate their potential for harm to individuals and the public; and
- that only "fit and proper" people possess and use firearms.

What policy options have been considered, including any alternatives to regulation?

Part A: Prohibited firearms for sport shooting

- Option 1: Permit the use of prohibited firearms for sport shooting on pistol ranges.

- Option 2: Permit the use of prohibited firearms for sport shooting on pistol ranges by previous international competitors (10 people).
- Option 3: Retain the status quo prohibited firearms cannot be used for sport shooting (Ministry's preferred option).

Part B: Blank-firing guns

- Option 1: Require a firearms licence to purchase and import new blank-firing guns and grandfather out existing blank-firing guns that are not owned by licence holders (Ministry's preferred option).
- Option 2: Include blank-firing guns that can be readily converted into a firearm in the definition of a firearm and buyback blank-firing guns that are owned by non-licence holders.
- Option 3: Status quo – blank-firing guns can be purchased and imported by anyone including non-licence holders.

Part C: Gang membership

- Option 1: Include gang membership as an automatic disqualifying factor, preventing anyone identified as being in a gang from obtaining a firearms licence.
- Option 2: Maintain discretion for the regulator to determine if an applicant is fit and proper by taking into account gang membership and association (Ministry's preferred option).

Part D: Visitor's Licences

- Option 1: establish a system of multi-entry licences, allowing repeat visits under one visitor's licence (Ministry's preferred option).
- Option 2: remove the automatic expiry requirement of visitor's firearms licences.
- Option 3: create a streamlined system for Australian licence holders.
- Option 4: maintain the existing system where all visitor's licences expire automatically once the visitor leaves the country.

The Ministry has not considered non-regulatory options as the policy problems identified are within the Arms Act and must be addressed through legislative amendments.

What consultation has been undertaken?

The Ministry conducted public consultation on the Act over seven weeks (from 13 January to 28 February 2025). Views were sought on what is working well in the Act and what needs change, rather than specific policy proposals. The Ministry received 8,448 submissions.

Firearms products

- *Part A: Prohibited firearms for sport shooting:* submitters were split on the use of prohibited firearms in sporting competitions. Many licence holders sought the reinstatement of the repealed endorsement that allowed possession of semi-automatic firearms with large capacity magazines to enable participation in three-gun shooting competitions. Submissions from the non-firearms community supported retaining the prohibition on use of these firearms in sporting competitions or on shooting ranges; and
- *Part B: Blank-firing guns:* some submitters raised concerns that anyone can import blank-firing guns and convert them into firearms.

Licensing

- *Part C: Gang membership:* some submitters were in favour of stronger background checks on firearms licence applicants and supported the idea of including an automatic disqualification of people with a violent criminal history or gang affiliation; and
- *Part D: Visitors' licences:* some submitters found the system frustrating, with the need to obtain a licence for every visit to New Zealand and being advised to apply for this four-months in advance. Submitters also noted planning multiple trips within the space of a few weeks or months is difficult, as they cannot apply for a subsequent licence while holding a currently valid licence.

Is the preferred option in the Cabinet paper the same as preferred option in the RIS?

The Cabinet paper and RIS have the same preferred option for:

- Part B: Blank-firing guns; and
- Part D: Visitors' licences.

The Cabinet paper and RIS have different preferred options for:

- Part A: Prohibited firearms for sport shooting; and
- Part C: Gang membership.

Summary: Minister's preferred option in the Cabinet paper

Costs (Core information)

Outline the key monetised and non-monetised costs, where those costs fall (e.g. what people or organisations, or environments), and the nature of those impacts (e.g. direct or indirect)

In addition to the proposals in this RIS, the rewrite of the Act will have overall implementation cost implications e.g., Information Technology (IT) changes, developing operational guidance, public communications. These changes will require project management. s9(2)
(f)(iv)

Firearms products

Part A: Prohibited firearms for sport shooting:

- Monetised: The new prohibited firearms sport shooting regime can be managed within existing baseline appropriations, and from fees charged to those wishing to apply for an endorsement and ranges wishing to host sport shooting (fees would be determined through a consultation approach as required by section 82 of the Act).
- Non-monetised: the Ministry considers there will be public safety costs as some members of the public may feel less safe from the wider availability of prohibited firearms, particularly in more urban areas.

Part B: Blank-firing guns:

- Monetised: introducing further limitations on importing blank-firing guns has minimal costs. The regulator will need to update its internal and external documents and guidance. It is expected that this can be managed within existing baseline appropriations.
- Non-monetised: the Ministry considers there will be no costs.

Part C: Gang membership:

- Monetised: introducing gang membership as an automatic disqualifying factor for a firearms licence has minimal costs. The regulator will need to update its internal and external documents and guidance. It is expected that this can be managed within existing baseline appropriations. The regulator estimates implementation costs can be covered within the implantation project team.
- Non-monetised: the Ministry considers this will likely infringe on individuals' freedom of association as set out in section 17 of the New Zealand Bill of Rights Act 1990 (BORA). The Office of the Privacy Commissioner has advised automatically disqualifying someone from holding a firearms licence raises significant privacy concerns.

Part D: Visitors' licences:

- Monetised: introducing multi-entry visitor licences has some costs. The regulator will need to update its internal and external documents and guidance. **s9(2)(f)(iv)**
- Non-monetised: the Ministry considers there will be no costs.

Benefits (Core information)

Outline the key monetised and non-monetised benefits, where those benefits fall (e.g. what people or organisations, or environments), and the nature of those impacts (e.g. direct or indirect)

Firearms products

Part A: Prohibited firearms for sport shooting:

- Monetised: the Ministry considers there will be no monetary benefits.
- Non-monetised: there will be direct personal benefits to a small number of individual licence holders who wish to participate in three-gun sport shooting competitions.
- It may also enable clubs to grow and receive more membership fees to fund maintenance of the ranges.

Part B: Blank-firing guns:

- Monetised: the Ministry considers there will be no monetary benefits.
- Non-monetised: the Ministry considers public safety will be improved as the risk of significant volumes of these items being converted into firearms is reduced.

Licensing

Part C: Gang membership:

- Monetised: the Ministry considers there will be no monetary benefits.
- Non-monetised: This may reduce gang members lawfully accessing firearms.

Part D: Visitors' licences:

- Monetised: the regulator will benefit from a slight decrease in the number of applications to process, based on current figures this is less than 5% of all visitors licence applicants, though this figure could rise as a result of the new process. The regulator will still need to run checks on these return visitors without collecting the fee for an application.

- Non-monetised: approximately 20-40 overseas visitors per year will benefit from an easier process to visit New Zealand. This number is based on current figures, and could rise as a result of this new system.

Balance of benefits and costs (Core information)

Does the RIS indicate that the benefits of the Minister's preferred option are likely to outweigh the costs?

Firearms products

Part A: Prohibited firearms for sport shooting:

- The costs (increased risk to public safety) of permitting prohibited firearms for sport shooting are expected to outweigh the direct benefits for the small number of individuals that wish to participate in three-gun shooting competitions.

Part B: Blank-firing guns:

- The public safety benefits of regulating the importation and use of blank-firing guns are expected to outweigh the costs.

Licensing

Part C: Gang membership:

- The risk of increased appeals and costs to individual rights to freedom of association by including gang membership as an automatic disqualifying factor are considered higher than the benefits.

Part D: Visitors' licences:

- The proposal to introduce multi-entry licences is expected to have benefits by encouraging more visitors to re-enter New Zealand for shooting activities, as the process will be easier. The benefits are expected to outweigh the costs. There is expected to be a low cost to the regulator as they will still need to run checks on multi-entry visitors without recovering an application fee (currently \$25 per application).

Implementation

How would the proposal be implemented, who would implement it, and what are the risks?

These proposals require amendments to the Act and the Arms Regulations 1992 (the Regulations). The changes would be implemented by the regulator through updates to systems and processes, forms, operational guidance and communications. Transitional arrangements will be set out in the Act.

Limitations and Constraints on Analysis

The limitations and constraints on the analysis in this RIS include:

- the consultation process sought feedback on issues stakeholders had with the Act rather than on specific policy proposals;
- the criteria used to assess the proposals were agreed as part of the overall policy framework and work programme for firearms reform in advance of the policy proposals being developed [CAB-24-MIN-0158 refers]; and
- the Ministry was undertaking a large reform programme within a short timeframe, which limited the amount of time it could consider individual topics;

I have read the Regulatory Impact Statement and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the preferred options.

Responsible Manager(s) signature:



Kathy Brightwell
General Manager, Civil and
Constitutional Policy
29 May 2025

Quality Assurance Statement

Reviewing Agency: Ministry of Justice

QA rating: Meets

Panel Comment: A Panel within the Ministry of Justice has reviewed Regulatory Impact Statements for consistency with the quality assurance criteria. The Panel concluded that they meet the quality assurance criteria. In reaching this conclusion, the Panel noted that some criteria used to assess the options overlapped in substance and this could have affected the favourability of some options compared to the status quo. The criteria were set by Cabinet, which was noted as a constraint for all four Regulatory Impact Statements.

Introduction to Firearms Reform – Encouraging a culture of community safety and support (1 of 4)

Introducing the Arms Act 1983 (the Act)

1. The firearms regime is a system focused on regulating people and products to protect public safety while enabling legitimate possession of firearms by safe users. A diagram setting out New Zealand’s firearms regulatory regime is available in Appendix 1 of the accompanying Cabinet paper: *Firearms reform programme Phase 4: Rewrite of the Arms Act 1983 – legislative policy proposals*.
2. This Regulatory Impact Statement (RIS), *Firearms Reform – Encouraging a culture of community safety and support (1 of 4)*, is the first of a suite of four RIS which contain proposals to strengthen these settings and reduce unnecessary compliance burdens that do not support public safety. The others are:
 - *Firearms Reform – Enabling legitimate possession and use (2 of 4)*;
 - *Firearms Reform – Ensuring compliance through education and enforcement (3 of 4)*; and
 - *Firearms Reform – Maintaining public interest and safety (4 of 4)*.
3. This RIS focuses on enabling those who wish to undertake legitimate firearms activities (such as pest control, animal euthanasia on farms, and sport shooting) to be able to do so by encouraging a culture of community safety and support. The policy issues discussed in this RIS are:
 - *Firearms Products*:
 - Part A: Prohibited firearms for sport shooting; and
 - Part B: Blank-firing guns.
 - *Licensing*:
 - Part C: Gang membership; and
 - Part D: Visitor’s licences.

What objectives are sought in relation to the policy problems?

4. The overarching objectives of the firearms reform programme agreed by Cabinet in May 2024 [CAB-24-MIN-0158 refers] are to deliver a firearms regulatory system that:
 - supports the safe possession and use of firearms and other weapons for legitimate purposes (e.g. sport, hunting, collecting and pest control); and
 - imposes controls that protect individual and public safety from firearms-related harm.
5. The policy objectives specific to firearms products and licensing are:
 - that firearms products are appropriately regulated, relative to the characteristics of the product, to mitigate their potential for harm to individuals and the public; and
 - that only “fit and proper” people possess and use firearms.

What general consultation has been undertaken?

6. The Ministry of Justice (the Ministry) conducted public consultation on the Act over seven weeks (from 13 January to 28 February 2025). Views were sought on what is working well

in the Act and what needs change, rather than specific policy proposals. Submissions were received by email, post and through the Ministry's Citizen Space consultation hub. The Ministry received 8,448 submissions.

7. The Ministry directly engaged with the Minister's Arms Advisory Group, Dealers Reference Group, Te Puna Aonui Systems Working Group, Arms Engagement Group, Clubs and Ranges Group, Ministerial Advisory Group for the Victims of Retail Crime, Māori Firearms Forum, Māori Focus Group Wānanga (coordinated by the Ministry), Sporting Shooters Association of New Zealand, New Zealand Police Association, Theatrical Armourers Guild of New Zealand, and Firearms Community Advisory Forum.
8. The Ministry also engaged with other government agencies including New Zealand Police, Firearms Safety Authority (FSA), New Zealand Defence Force, Department of Conservation, Ministry for Primary Industries, New Zealand Customs Service, and Ministry of Culture and Heritage.
9. Feedback received through the consultation on specific topics is discussed in more detail in each of the policy proposal sections.

Assessing options to address the policy problem

What criteria would be used to compare options to the status quo?

10. The options have been considered against the criteria set out in the policy framework for firearms reform agreed in May 2024 [CAB-24-MIN-0158 refers], to ensure the proposals:
 - **Simple:** are simple and easy to understand and apply;
 - **Necessary:** are necessary to achieve the overarching objectives;
 - **Protect individuals:** protect individual freedoms and rights and the security and privacy of personal information;
 - **Protect the public:** protect the public from firearms-related harm; and
 - **Effective and Efficient:** provide for effective and efficient delivery of service.

What scope would options be considered within?

11. The scope of policy options was influenced by the ACT Party and National Party coalition agreement to "rewrite the Arms Act 1983 to provide for greater protection of public safety and simplify regulatory requirements to improve compliance". The focus is on rewriting the Act with the opportunity to take a systematic and considered approach to the Act as a whole, modernising the legislation to deliver public safety outcomes for New Zealand, and simplifying regulatory requirements.

How would the proposals be monitored, evaluated, and reviewed?

12. The Ministry will continue to monitor the Act as part of its regulatory stewardship responsibilities. This includes developing a monitoring and evaluation plan as recommended in the Review of the Firearms Registry, and a statutory review of the operation of the Act.

Firearms Products

Part A: Prohibited firearms for sport shooting

Section 1: Diagnosing the policy problem

What is the context behind the policy problem and how is the status quo expected to develop?

13. Until 2019, the Act allowed for licence holders to apply for an endorsement that enabled them to possess and use semi-automatics with large capacity magazines.
14. On 15 March 2019, a terrorist used large capacity magazines on standard category firearms (which he obtained legally) to attack and kill 51 worshippers at two Christchurch masjids. Globally, the use of firearms to kill as many civilians as possible has become an increasingly common terrorist tactic.² Terrorists prefer semi-automatics with large capacity magazines, given their ability to cause maximum casualties.
15. The availability of such firearms is one of a range of factors that make some countries more prone to terrorist attacks with firearms than others³. Limiting the availability of firearms means that attempts to obtain prohibited firearms not only take time and planning, but also significantly increases the likelihood of a terrorist being detected. The greater the availability of prohibited firearms in New Zealand, the proportionately greater the risks to public safety.
16. Following the 2019 Christchurch terrorist attacks, and petitions with 70,000 signatures calling for a ban of military style semi-automatic firearms and assault rifles,⁴ the government made changes to prohibit military style semi-automatics and other semi-automatics that have large capacity magazines (more than 10 cartridges). The changes were made through the Arms (Arms (Prohibited Firearms, Magazines and Parts) Amendment Bill. Since April 2019, prohibited firearms and their associated prohibited magazines can only:
 - be possessed and used by pest control businesses under very specific circumstances;
 - be possessed by collectors with the vital part stored elsewhere; or
 - be possessed and used by theatrical armourers with blank ammunition.
17. During consideration of the Arms (Arms (Prohibited Firearms, Magazines and Parts) Amendment Bill the select committee recommended not including a sport shooting exemption, stating “providing an exemption for sporting competitors would allow more semi-automatic firearms to remain in circulation than we consider desirable for public safety”.

² For example, firearms played a major part in terrorist attacks in Mumbai in 2008 (166 dead), Norway in 2011 (77 dead), Paris in 2015 (130 dead), Buffalo in 2022 (10 dead), and Moscow in 2024 (145 dead), in addition to the Christchurch attacks in 2019 (51 dead).

³ Countries with stricter rules around prohibited firearms tend to have less mass shooting such as Australia, Canada and the United Kingdom.

⁴ [Petitioners welcome gun law reform announcement | Scoop News](#)

18. The Minister of Police sought further advice as part of the policy development for the Arms Legislation Bill 2019. Cabinet agreed to retain the status quo of no exemption for sport shooting.
19. Previous owners and users of these firearms products were given a temporary amnesty from prosecution to allow them to surrender the products and apply for compensation through a “buy-back” scheme.
20. Before the law changes in 2019, there were 7,566 licence holders with endorsements that enabled them to possess and use semi-automatics with large capacity magazines. In 2019, Police estimated that 50 percent of these licence holders (3,783 people) may be participating in sport shooting at a local, national or international level. Police advised that in the 12 months before March 2019, 10 licence holders participated in international three-gun sport shooting competition events.
21. Three-gun events involve participants using a modern sporting rifle (such as an ArmaLite Rifle 15),⁵ a pistol, and a shotgun.⁶ Three-gun events are run by the International Practical Shooting Association (IPSC). Competitions generally involve courses where the shooter must move through different stages of the course and engage different target types in a variety of different positions, each stage requiring the use of one of the three types of firearms. Three-gun events are not included in international Commonwealth or Olympic sporting events.
22. The IPSC does not specify a maximum magazine capacity for the type of rifle used,⁷ but it does limit the magazine capacity for the type of shotgun used (up to 9 rounds).⁸ Police advise that participants in three-gun events typically use a prohibited rifle with up to 32 rounds. This means that three-gun events can involve the use of both prohibited shotguns and prohibited rifles. The specific type of firearms used are determined by the event organisers and will depend on what the range is certified for.
23. In May 2019, Police advised the Government to retain the ban on the use of prohibited firearms on ranges (Police reference IPR19/130 refers).⁹ This advice stated that expanding the use of prohibited firearms for sport shooting (such as three-gun events) “open New Zealand to taking on significant public safety risks when the primary benefit is private and there are many alternative sport shooting events and disciplines”. Police advised that permitting the use of prohibited firearms for sport shooting would be costly to administer for a very limited public or private benefit, but did not specify the estimated costs. Police also advised that there would need to be new policy and operational frameworks that would require a resource intensive inspection regime.

There are a variety approaches used internationally

24. New Zealand’s current regulatory framework relating to semi-automatics with large capacity magazines closely aligns with Australia, Canada and the United Kingdom.

⁵ These firearms include up to 30 round magazines.

⁶ [The Exciting Sport of 3-Gun Shooting • NSSF](#)

⁷ [IPSC :: The Rifle Divisions List](#)

⁸ [IPSC :: The Shotgun Divisions List](#)

⁹ [ipr-19-130-sporting-exemptions-options-discussion-03-06-19.pdf](#)

25. The International Practical Shooting Confederation (IPSC) held World Rifle three-gun competitions in 2017 in Russia, in 2019 in Sweden and in Finland in 2024. All three countries have compulsory military service and have political reasons for preparing civilians for firearms used by the military. Sweden also has stricter requirements than New Zealand for firearms licence eligibility.
26. New Zealand licence holders can participate in other international competitions run by both the IPSC and the National Rifle Association of America that do not require the use of firearms that are prohibited in New Zealand. There are many sporting codes, such as Formula 1, where New Zealanders who wish to participate and compete must travel or base themselves overseas due to limited resources or opportunities in New Zealand.

What is the policy problem or opportunity?

27. Licence holders cannot participate in certain sport shooting events and competitions (such as three-gun events) in New Zealand because they require the use of firearms that are prohibited under the Arms Act 1983.

What consultation has been undertaken on this topic?

28. The views of stakeholders on this topic have been shared through various channels since the law changes in 2019, including submissions on Bills, submissions to the Petitions Committee, and through consultation on the review of the Arms Act earlier this year.

There has been ongoing concern from some licence holders that the 2019 law changes did not include an exemption for sport shooting

29. Some licence holders have concerns that prohibited firearms can longer be used for sport shooting. These concerns have been raised regularly since 2019, though consultation on the Arms (Prohibited Firearms, Magazines, and Parts) Amendment Bill, Arms Legislation Bill, petitions to Parliament,¹⁰ submissions to the Petitions Committee and during consultation on the review of the Arms Act.
30. In June 2024, the Petitions Committee acknowledged that this was a complex area with a variety of views, and suggested that the following matters be considered as part of the upcoming review of the Arms Act.
 - The current lack of clarity on how many people would benefit from permitting prohibited firearms for sport shooting (noting that estimates ranged from 10 people competing internationally to one-sixth of all gun club members).
 - Ensuring the following bottom-line requirements:
 - Storage of firearms at a level equivalent to or greater than the current exemptions for pest control businesses and historic firearms.
 - Length of local club membership, such as a minimum of five years
 - Significant additional training and assessment on top of any regular licence requirements
 - Resourcing for ongoing close scrutiny and inspection of any licence holder who have a sport shooting exemption.
31. The committee acknowledged the willingness of gun clubs to contribute to screening, training, and monitoring. The committee also suggested that gun club processes would

¹⁰ [Petition of Niru Wijesundara: Allow gun club members to own banned semi-automatic rifles for competition](#)

need to be reviewed to identify whether clubs have the capability to identify owners with criminal or terrorist intent.¹¹

32. During consultation on the Arms Act rewrite, many submitters sought the “return” of their ability (through a licence endorsement) to use what was then referred to as military style semi-automatics for sport shooting.

Stakeholders affected by firearms violence and public safety advocates do not support the use of prohibited firearms for sport shooting

33. Since the law changes in 2019, stakeholders affected by firearms violence and public safety advocates have regularly reiterated their views through the media and in submissions that permitting prohibited firearms for sport shooting would increase public safety risks and could result in future terrorist attacks. These stakeholders include the Muslim Community, residents of Aramoana and Christchurch, and first responders (such as Police). They refer to the fact that the terrorist responsible for the Christchurch terrorist attacks was able to train and practice using large capacity magazines at a shooting club without any alarms being raised.

Some rural submitters want looser controls on using prohibited firearms for pest control

34. There were also some concerns from the rural community, who sought the ability to use prohibited firearms on their farms for pest control. This is because current pest control endorsements are limited to pest control businesses that meet very strict criteria to be able to use large capacity magazines.

Section 2: Assessing options to address the policy problem

What options are being considered?

Option 1 – Permit the use of prohibited firearms for sport shooting on pistol ranges

35. Option 1 would enable any firearms licence holder to apply for an endorsement to use prohibited firearms for sport shooting on a pistol range.
36. The use of prohibited firearms for sport shooting would be restricted to taking place at a certified pistol range. Pistol clubs and ranges would also need to meet additional requirements to enable the safe use of prohibited firearms, such as secure storage.
37. Participants in sport shooting events or competitions on a pistol range using prohibited firearms would have to hold an endorsement on their licence for this purpose. To hold an endorsement, licence holders would be required to:
- be a member of a pistol-shooting club for at least three years
 - attend at least six club events per year (where both a pistol and a prohibited rifle match can count towards attendance requirements on the same day)
 - comply with secure storage requirements consistent with a pistol endorsement
 - renew the endorsement every 2.5 years.

¹¹ [Petition of Niru Wijesundara: Allow gun club members to own banned semi-automatic rifles for competition](#)

38. International participants in sport shooting events would have to hold both a visitor's licence and an endorsement for using prohibited firearms for sport shooting. They would need to provide evidence to Pistol New Zealand and the regulator that they are member of a pistol club in their country of residence. These requirements would be similar to what international visitors need to do to hold a visitor's licence with a pistol endorsement to come to New Zealand to compete in pistol competitions.

Option 2 – Permit the use of prohibited firearms for sport shooting on pistol ranges by previous international competitors (10 people)

39. Option 2 is identical to Option 1, except that only New Zealand licence holders who travelled overseas to compete in international three-gun events between 2014-2019 would be eligible to apply for an endorsement to use prohibited firearms for sport shooting on a pistol range. Based on Police advice, this would apply to approximately 10 people. Under this option, new starters would not be eligible to apply for the endorsement.

Option 3 – Status Quo (Ministry's preferred option)

40. Option 3 retains the status quo, whereby prohibited firearms cannot be legally used for sport shooting.
41. This option does not prevent any person from competing in shooting events at the Olympic or Commonwealth Games, which do not include events that use firearms prohibited under New Zealand law.

How do the options compare to the status quo/counterfactual?

	Option 1: Permit the use of prohibited firearms for sport shooting on pistol ranges	Option 2: Permit the use of prohibited firearms for sport shooting on pistol ranges by previous international competitors (10 people)	Option 3: Status Quo – prohibited firearms cannot be used for sport shooting
Simple	- This option would not be simple to implement. The regulator would need to update systems and processes, forms, operational guidance and communications. Police would need to develop a new framework to ensure the safe use of prohibited firearms on pistol ranges. Pistol ranges may need to upgrade their facilities and/or processes.	- This option would not be simple to implement. The regulator would need to update systems and processes, forms, operational guidance and communications. Police would need to develop a new framework to ensure the safe use of prohibited firearms on pistol ranges. Pistol ranges may need to upgrade their facilities and/or processes.	0 No implementation necessary
Necessary	-- This option is arguably not necessary, as it benefits only a small number of private individuals. It does not contribute to the greater protection of public safety, simpler regulation or improving compliance.	--- This option is arguably not necessary, as it benefits only a very small number of private individuals (10 people). It does not contribute to the greater protection of public safety, simpler regulation or improving compliance.	0 Under the status quo, there would be no change to the existing public safety controls that are considered necessary.
Protect Individual	+ This option enables licence holders to apply for endorsement to use prohibited firearms for sport shooting, subject to complying with regulatory controls.	- Almost all licence holders who have sought the “return” of endorsements to possess and use prohibited firearms are unlikely to be eligible to apply to use prohibited firearms for sport shooting	0 Under the status quo, individuals cannot use prohibited firearms for sport shooting
Protect Public	--	-	0

	This option would increase the risk to public safety, because it will result in more prohibited firearms in New Zealand, which increases the risk that these firearms could end up in the wrong hands (through theft, for example). This option will also likely create uncertainty and fear for those who are concerned that it could increase the risk of another terrorist attack, especially the Muslim community. This option may also encourage further requests from other licence holders who are not eligible to use sport shooting such as farmers who want to use prohibited firearms for pest control.	This option would increase the risk to public safety, because it will result in more prohibited firearms in circulation in New Zealand, which increases the risk that these firearms could end up in the wrong hands (through theft, for example). However, this risk is smaller than Option 1 because the number of people who would be eligible to apply for an endorsement is very small, so the number of additional prohibited firearms will also be small. Despite the smaller risk than Option 1, this option will also likely create uncertainty and fear for those who are concerned that it could increase the risk of another terrorist attack, especially the Muslim community.	Under the status quo, the number of prohibited firearms will not significantly increase, because they are currently tightly controlled
Effective and efficient	- This option is not an efficient use of resources, because it will create monetary and non-monetary costs for pistol clubs, Police, the regulator and the general public, while delivering benefits to a small number of licence holders.	-- This option is not an efficient use of resources, because it will create monetary and non-monetary costs for pistol clubs, Police, the regulator and the general public, while delivering benefits to a very small number of licence holders (10 people)	0 Maintaining the status quo is effective in maintaining public safety, and efficient as it does not attract additional monetary and non-monetary costs
Overall assessment	- While this option enables those who are eligible for the relevant endorsement to be able to participate sport shooting, it would result in more prohibited firearms in circulation which increases the risk of the public harm.	- This option would result in a significant monetary and non-monetary costs for the benefit of a few individuals.	0 The status quo continues the existing public safety controls to limit the number of prohibited firearms in the country.

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

42. The primary trade-off is between public safety and individual choice for licence holders who wish to use prohibited firearms for sport shooting.
43. The Ministry recommends the status quo is retained and no changes are made to permit the use of prohibited firearms for sport shooting in New Zealand. The status quo (Option 3) aligns with the regulatory approach taken by our international counterparts in Australia, Canada and the United Kingdom, where semi-automatics with large capacity magazines are not permitted for sport shooting. The policy objective of this regulatory approach is to protect public safety by reducing the availability of firearms that can be used to cause maximum casualties in a short period of time. Tight regulatory controls on semi-automatics with large capacity magazines also increases the likelihood that attempts to obtain such weapons by bad actors will be detected. Option 3 therefore provides the greatest public safety benefits.
44. Options 1 and 2 would increase risks to public safety by increasing the availability of prohibited firearms in New Zealand, and the consequent risk that they will be accessed by bad actors and used to cause harm. Option 1 would create proportionately greater public safety risks than Option 2, as under Option 2 there would be a strict limit on the number of people who could apply for an endorsement to use prohibited firearms for sport shooting (approximately 10).
45. Options 1 and 2 do not meet the criteria of being simple or necessary. Options 1 and 2 would require Police to develop a new capability and regulatory framework to ensure that pistol ranges could be certified to a standard that enables the safe use of prohibited firearms for sport shooting. Under these Options, the regulator would need to update their systems and processes, forms, operational guidance and communications for the use of prohibited firearms for sport shooting. The regulator would also need to examine and classify any prohibited firearms to make sure they are suitable for use on a specified pistol range, as currently occurs with pistols.
46. Options 1 and 2 could require pistol clubs and ranges to upgrade their facilities and/or processes to enable the safe use of prohibited firearms for sport shooting, which would attract monetary and transaction costs. This is inconsistent with recent Government policy decisions and legislative amendments to reduce oversight and regulation for shooting clubs and ranges (see the Arms (Shooting Clubs, Shooting Ranges, and Other Matters) Amendment Act 2025).
47. The expansion of the proposal to include both New Zealand and international licence holders further increases the public safety risks as the proposal does not provide for sufficient licensing controls on international visitors that want to bring prohibited firearms into New Zealand.
48. In conclusion, both Options 1 and 2 would deliver private benefits to a small number of individuals, while creating monetary costs for pistol clubs and ranges, Police and the regulator, and non-monetary costs for the public in the form of increased risk to public safety. The private benefits are therefore significantly outweighed by the costs of these options. Any decision to widen the use of prohibited firearms on the range could result in

further requests to select committee to also loosen current controls on who is eligible for a pest control endorsement, which would also have public safety implications. This is because there were submissions from farmers and other land-owners who thought that the regulatory requirement of needing to be a professional to carry out pest control was too expensive and so adequate pest control was unable to occur.

Is the Minister's preferred option in the Cabinet paper the same as the agency's preferred option in the RIS?

49. No, the Minister's preferred option is Option 1, to permit the use of prohibited firearms for sport shooting on pistol ranges.

What are the marginal costs and benefits of the preferred option in the Cabinet paper?

Affected groups	Comment.	Impact	Evidence Certainty.
Additional costs of the preferred option compared to taking no action			
Clubs and ranges	No pistol ranges are currently certified for the use of any type of prohibited firearm for sport shooting, so they may need to be upgraded to enable prohibited firearms to be safely used there. Any upgrade costs would be range specific. There will also be operational and administrative costs to pistol clubs and ranges to meet the additional Police and regulator oversight and requirements for storage and use of prohibited firearms.	Variable depending on the club and the type of prohibited firearms proposed to be used.	Low
Regulators	Police have advised that there would be costs to Police and to the regulator associated with updating the range manual for managing the public safety risks associated with the use of prohibited firearms.	High	Medium

	The costs of processing the applications would be cost recovered from the licence holder.		
Licence holders	There would be costs associated with applying for (and renewing) an endorsement to use prohibited firearms for sport shooting.	Low	Low
Public	Some members of the public may not feel as safe if more prohibited firearms are available. These concerns are supported by the previous petitions of 70,000 people that wanted to see these items banned.	Medium	High
Total monetised costs			
Non-monetised costs		High	
Additional benefits of the preferred option compared to taking no action			
Licensed firearms owners	Small private benefits for those who want to use prohibited firearms to participate in sport shooting.	Low	Low
Total monetised benefits			
Non-monetised benefits		Low	

Section 3: Delivering an option

How would the proposal be implemented?

50. Subject to amendments to the Arms Act and regulations, Options 1 and 2 would be implemented by Police and the regulator.
51. Police have advised that in order to implement Options 1 and 2 they would need to develop new capability and a regulatory framework to ensure that pistol ranges are

certified to a standard that enables the safe use of prohibited firearms under section 380 of the Arms Act. This would involve updating the New Zealand Shooting Range Manual.

52. Police cannot draw on material developed or used for this purpose before 2019. This is because there was minimal oversight of the use of prohibited firearms on ranges, so no capability or regulatory framework was required. From the FSA's experience with Police shooting ranges, use of prohibited firearms increases the amount of damage to ranges requiring them to have more regular maintenance and repair. This is in part due to the rapid rate of fire, leading to increased wear and tear on backstops and bullet catches.
53. Police have advised that no pistol ranges are currently certified for the use of any type of prohibited firearm for sport shooting. Police has advised that they will need to review their list of currently certified ranges to ensure their certification allows for the calibre and firing range required. This means that the regulator would need to examine and classify any prohibited firearms to make sure they are suitable for use on a specified range, as currently occurs with pistols.

Firearms Products

Part B: Blank-firing guns

Section 1: Diagnosing the policy problem

What is the context behind the policy problem and how is the status quo expected to develop?

Blank-firing guns are used to start races and in theatrical events by non-firearms licence holders

54. A blank-firing gun is an item that resembles a firearm but is designed to only fire blank cartridges or caps.¹² It is estimated there are between 5,000 to 10,000 blank-firing guns in New Zealand. Some of these blank-firing guns are held by non-licence holders. As blank-firing guns do not meet the definition of a “firearm” there is no requirement for them to have a serial number or be registered.
55. Historically, blank-firing guns were used to start running races. However, modern technology now provides alternative options, such as electronic systems or starter pistols that cannot be converted because they do not use cartridges.
56. Blank-firing guns are also sometimes used in plays, movies and historical re-enactment events (such as public displays by reenactors at Museum heritage days). Most theatrical armourers are required to hold an endorsement or dealer’s licence for using and storing firearms for these activities, as they typically use standard firearms with blank cartridges. In 2023, Police undertook consultation about introducing controls on blank-firing guns such as requiring a firearms licence. Feedback indicated that there may be some re-enactors who only possess blank-firing guns for their events. However, most re-enactors who responded indicated that they held firearms licences in order to use standard firearms with blank cartridges.

There are limited regulatory controls on blank-firing guns

57. As there is no requirement to hold a firearms licence to possess blank-firing guns, Police have minimal oversight of who possesses blank-firing guns, or whether they would meet the “fit and proper” standard for firearms licence holders.
58. The only control on sales is the requirement for a permit to import. Currently, fewer than 10 blank-firing guns are imported each year. If a person wishes to import a blank-firing gun, they must apply to the regulator for a permit to import. The applicant is not required to provide a reason for importing the gun. The Police Armoury assesses the gun upon its entry to the country, and if the Armoury is satisfied that it is not a firearm, the regulator must issue the applicant a permit. The regulator can only refuse the permit if the gun has been assessed to be a firearm.

¹² A blank-firing gun is: anything that—
has the shape of a firearm or restricted weapon, or otherwise resembles a firearm or restricted weapon; and
is capable of firing blank cartridges, but incapable of discharging any shot, bullet, missile, or other projectile; and includes a starting pistol that fires a blank cartridge or a cap.

59. The very small number of importations of blank-firing guns is likely due to Police oversight increasing since the introductions of import permits.
60. If Police find converted blank-firing guns possessed by a person without a firearms licence, Police can charge the person with illegal possession of a firearm.

Most blank-firing guns can be readily converted into firearms

61. In checking imported blank-firing guns, the Police Armoury considers whether the item can be converted to meet the extended definition of a firearm as set out in section 2 of the Act, which is “anything that has been adapted so that it can be used to discharge a shot, bullet, missile, or other projectile by force of explosive”.
62. Requirements for licensing depend on the type of blank-firing gun. If the item:
- cannot be converted, then no licence is required;
 - can be converted to a firearm, it meets the definition of a firearm and is required to be registered and possessed by a licence holder;
 - can be converted and is fully automatic, it may meet the definition of a restricted weapon and no longer be able to be possessed; and
 - can be converted to a pistol, then an endorsement would also be required.

s6(c)

Blank-firing guns are being seized at crime scenes

66. Police advised the Police Register of Property (PROP) recorded that 306 blank-firing guns were seized between 1 January 2021 and 31 December 2024 at a crime scene. The Police

s6(c)

Armory tested these blank-firing guns and confirmed that they had been either fully or partially converted into a firearm.

Year	Number of blank-firing guns seized at a crime scene
2021	108
2022	92
2023	62
2024	44

67. It is not clear why there has been a decrease in the number of blank-firing guns being recovered at crime scenes. It could be related to the reduction in the number of blank-firing guns being imported, but it is too early to confirm this link.

Blank-firing guns are more highly regulated in comparable jurisdictions

68. Australia, Canada and the United Kingdom have stricter firearms controls than New Zealand in general, as well as controls regarding blank-firing guns.
69. The Protocol against the Illicit Manufacturing of and Trafficking in Firearms, their Parts and Components and Ammunition (Firearms Protocol) was adopted by the United National General Assembly by resolution on 31 May 2001 (resolution 55/255). The Protocol recommends including the words “readily convertible” in the definition of a firearm.
70. Typically, comparable countries have incorporated the recommendations of the Firearms Protocol into domestic laws:
- Australia: a standard firearms licence is required to possess a blank-firing gun.
 - United Kingdom: the definition of a firearm includes blank-firing guns that can be readily converted into firearms.¹⁵ It recently identified a number of blank-firing guns that can be readily converted to firearms and has offered a buy-back and amnesty to reduce the circulation of these items in the community.
 - Canada: all replica firearms (including blank-firing guns) are considered prohibited devices. Individuals who owned any replicas before 1 December 1998 do not need a licence to possess the item. Businesses may possess, acquire, or import replica firearms if they have a valid firearms business licence that allows them to possess prohibited devices for an approved purpose.¹⁶
 - United States: Rules regarding blank-firing guns differ by state. Blank-firing guns are illegal in Maryland, New Jersey, Rhode Island, New York, Connecticut, Minnesota, Wisconsin, Washington, D.C. and in Puerto Rico.

What is the policy problem or opportunity?

¹⁵ In the United Kingdom, the definition of a firearm includes the being readily convertible. It defines readily convertible in section 1 (6) of the Firearms Act 1982 to be: “it can be so converted without any special skill on the part of the person converting it and the work involved in converting it does not require equipment or tools other than such as are in common use by persons carrying out works of construction and maintenance in their own homes.

¹⁶ Specific types of firearms | Royal Canadian Mounted Police

71. Anyone can purchase, possess and use a blank-firing gun, which can be readily converted into a firearm. This means that there is anything to stop a criminal purchasing a blank-firing gun for conversion. Police has advised that converted or partially converted blank-firing guns are being used in the commission of crimes. There is an opportunity to reduce the availability of blank-firing guns that can be readily converted to firearms, and thereby improve public safety.

What consultation has been undertaken on this topic?

72. In 2023, Police undertook engagement with the firearms community on options to address the public safety issue that modified blank-firing guns pose to the community. This included engagement with representatives from living history and re-enactment groups who often use blank-firing guns in lieu of transporting firearms across the country for meet ups. This feedback was used to inform the development of these proposals as the Police was unable to progress this work further before the 2023 general election.
73. In early 2025, the Ministry undertook consultation on the Act. This received a few submissions on blank-firing guns:
- some non-firearm organisations suggested prohibiting the importation of blank-firing guns because of the risk of them being converted into firearms;
 - some submitters stated that there are no legitimate uses for blank-firing guns;
 - one small firearms organisation stated that the risks raised by Police on the conversion of blank-firing guns is out of proportion to the problem;
 - no feedback was received from large firearm organisations; and
 - the regulator suggested it should have discretion about whether to issue a permit to import for blank-firing guns, based on the reason supplied for importing. It also submitted that blank-firing guns should be treated as an arms item and fully automatic blank-firing guns should be treated as restricted weapons.

Section 2: Assessing options to address the policy problem

What options are being considered?

Option One: Require a firearms licence to purchase and import new blank-firing guns and grandfather out existing blank-firing from those who do not have a licence to possess them (Ministry preferred option)

74. Under this option, only a licence holder would be able to purchase and import a new blank-firing gun. The regulator would have the discretion to refuse a permit to import for a blank-firing gun, if it considers the applicant has not provided a legitimate reason for possessing the item and does not have a firearms licence.
75. This option would only apply prospectively. This means that people who currently possess or use blank-firing guns would not be required to hold a firearms licence to lawfully possess or use them. They could sell their blank-firing guns without being a licence holder. The FSA could encourage blank-firing guns to be handed in, if they are no longer being used by the owner.

Option Two: include blank-firing guns that can be readily converted into a firearm in the definition of a firearm and buyback blank-firing guns that are owned by non-licence holders

76. Under this option, only licence holders would be able to purchase and possess blank-firing guns that can be readily converted to firearms. Unlicensed individuals would be required to hand their firearms in to Police through a buy back or apply for a firearms licence to continue to possess their blank-firing gun.

Option Three: Status Quo

77. Under the status quo, anyone can purchase, possess and use blank-firing guns. The regulator will continue to require a permit to import for anyone wishing to import a blank-firing gun but they do not have discretion to decline an import if the blank-firing gun has not been adapted to become a firearm.

How do the options compare to the status quo/counterfactual?

	Option 1: Require a firearms licence to purchase and import new blank-firing guns and grandfather out existing blank-firing guns that are not owned by licence holders	Option 2 include blank-firing guns that can be readily converted as a firearm and buyback blank-firing guns that are owned by non-licence holders	Option 3 – Status Quo
Simple	0 The regulator could refuse a permit to import if the applicant does not have a firearms licence as there would be no legitimate reason for the blank-firing gun to be imported. Under this option, there would be no need for buy-back and so it would not have financial implications. However, there will be some complexity by allowing non-licence holders to continue to use blank-firing guns that they are already own.	-- This option would require the Police to identify what blank-firing guns are easily convertible and educate licence holders on the difference, so that they can easily understand why different blank-firing guns are treated differently. This option would require a buy-back that would add complexity to the implementation. As many blank-firing gun owners may not be licence holders it may be difficult for the regulator to contact the relevant people.	0 No implementation is required.
Necessary	+ There is evidence that blank-firing guns are being converted into firearms and used in the conduct of crime. Therefore, it is necessary to meet the objective of increasing public safety.	+ There is evidence that blank-firing guns are being converted into firearms and used in the conduct of crime. Therefore it is necessary to meet the objective of increasing public safety.	0 There is a risk that blank-firing guns which can be purchased without a firearms licence are converted for live fire.
Protect Individual	0 This option would limit the ability for individuals to import blank-firing guns without a legitimate purpose. Those who own a blank-firing gun would be able to continue to own it, but they would not be able to sell it. The impact on non-licence holder is considered low given that there are no legitimate reasons for a blank-firing gun to be owned by a non-licence holder given advances in technology.	0 Individuals who want a blank-firing gun but who do not want a firearms licence would not be able to use and possess blank-firing guns that are not readily convertible. This option would require a buy-back scheme that owners of blank-firing guns would be eligible for. The impact on non-licence holder is considered low given that there are no legitimate reasons for a blank-firing gun to be owned by a non-licence holder given advances in technology.	0 No impact on individual freedoms
Protect Public	+ This option would not address the safety risks associated with blank-firing guns that are already in circulation being converted. However, over the long term there would be fewer blank-firing guns in circulation, which would result in fewer blank-firing guns being converted into firearms.	++ This option would make it more difficult for unlicensed individuals to import blank-firing guns. However, any existing blank-firing guns that are not surrendered would continue to be attractive to criminals for conversion into firearms which could cause harm.	0 There are public safety risks associated with blank-firing guns being converted.
Effective and efficient	0 This option is the easiest to implement. It does not require any buy-back of those blank-firing guns that are owned by non-licence holders. However, it will have some operational challenges given that some non-licence holders may continue to own blank-firing guns while they are being grandfathered out.	- This option would require a buyback and education campaign. This would require blank-firing guns to be handed in by those who have never had a licence and do not want a firearms licence to continue to own their blank-firing gun. This would not be an effective or efficient use of resources.	0 It is efficient for anyone to purchase a blank-firing gun, but this is not an effective control.
Overall assessment	++ This is simple to implement, and does not impact existing blank-firing gun owners. However, there would continue to be risks associated with existing blank-firing guns that could be converted.	- This option would have the most safety benefits if blank-firing guns are removed from circulation. However, there would be significant costs through a buy-back and not all blank-firing guns may be returned.	0 There are public safety risks due to the lack of regulation for blank-firing guns.

Key for qualitative judgements:

++	much better than doing nothing/the status quo/counterfactual
+	better than doing nothing/the status quo/counterfactual
0	about the same as doing nothing/the status quo/counterfactual
-	worse than doing nothing/the status quo/counterfactual
--	much worse than doing nothing/the status quo/counterfactual

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

78. Option One is the preferred option as it is simple to implement and enables the regulator to refuse imports for new blank-firing guns. This option is not a ban as proposed by some submitters but provides further controls at the point of import. Given the advancements in technology, there are no longer legitimate reasons for a non-licence holder to purchase a blank-firing gun. There are a few people that do not have a firearms licence that use blank-firing guns for re-enactment purposes. These people will be able to retain their existing blank-firing guns but will not be able to purchase further blank-firing guns.
79. Option Two is not preferred as including blank-firing guns in the definition of a firearm would also mean that they may fall into other categories of firearms. For example, a fully automatic blank-firing gun would be classified as a restricted weapon and some blank-firing guns would be considered pistols and would require endorsements. This would be out of step with the risk profile of blank-firing guns that have not been converted to firearms. This would have a significant impact for those who own various types of blank-firing guns but have no intention of converting it into a firearm.

Is the Minister's preferred option in the Cabinet paper the same as the agency's preferred option in the RIS?

80. Yes

What are the marginal costs and benefits of the preferred option in the Cabinet paper?

Affected groups	Comment	Impact	Evidence Certainty
Additional costs of the preferred option compared to taking no action			
Blank-firing gun users	Given the limited legitimate reasons for a blank-firing gun and the current limited demand for imports, the impact on this group is considered low. There would be no change to the existing process for firearm licence holders to import blank-firing guns.	Low impact	High
FSA	The regulator already has processes for requiring a special reason on an import. It would align its processes for blank-firing guns import permits with other import permits that require a special reason. This can be implemented within FSA's existing baselines.	Low impact	High

Total monetised costs		Captured within existing baselines	
Non-monetised costs		<i>Low</i>	
Additional benefits of the preferred option compared to taking no action			
Police	The Police Armoury would be less likely to need to assess whether a blank-firing gun sample is a firearm if they are less likely to be imported due to the special reason barriers. However, there is currently limited import permit demand anyway. Currently, blank-firing guns make up 30 percent of the Police Armoury's workload. This workload will reduce if it becomes more difficult for blank-firing guns to be possessed by criminals. This is because current criminal investigations require that blank-firing guns require the Armoury to determine whether it has been converted into a firearm.	Low impact	High
Public	There are public safety benefits of limiting the number of new blank-firing guns coming into the country, but demand for blank-firing guns has already decreased. However, there would still be existing blank-firing guns that may be converted and cause public harm.	Low impact	Medium
Total monetised benefits		Low	
Non-monetised benefits		<i>Low</i>	

Section 3: Delivering an option

How would the proposal be implemented?

81. This proposal would require amendments to section 18 of the Arms Act regarding the import permit process. There would also need to be amendments to the definition of a blank-firing gun to separate it from a starter pistol that uses only caps.
82. Following the passing of the amendment, the regulator would require time to adjust it's import permit process for blank-firing guns to be the same as the import permit process for

other arms items that require a special reason to import. The FSA would need to communicate these changes to importers.

83. The regulator would need to update their forms and operational guidance to enable the change and communicate the changes to licence holders.

Licensing

PART C: Gang membership

Section 1: Diagnosing the policy problem

What is the context behind the policy problem and how is the status quo expected to develop?

Verifying gang membership in New Zealand

84. A gang is defined as any organisation, association, or group of persons that is specified by a name that is the same as, or substantially similar to, that of any organisation, association, or group of persons identified in Schedule 2 of the Gangs Act 2024 (the Gangs Act). A group can be listed if members or associates have engaged in offending, but not everyone in that group needs to have committed offending.
85. Gangs listed in Schedule 2 are based on recommendations from Police, informed by the National Gang List (NGL). The NGL is produced by Police's Gang Harm Insights Centre. Police uses the NGL to measure gang membership in New Zealand but acknowledge its limitations; these numbers are inexact and should be understood as indicative only.¹⁷ For example, indicators that lead to someone being added to the NGL (such as wearing colours affiliated with gangs) are more visible and reliable than those that might lead to removal (such as the difficulty in corroborating that a person has ceased to be involved with a gang).

s9(2)(h)

Gangs and criminal activity partially overlap

87. While gang members and gang communities are not necessarily anti-social, gang environments serve as a concentration zone for individuals that pose a high risk for exhibiting anti-social behaviour. For example, as at March 2025 Gang members are responsible for 22 per cent of all firearms offences.¹⁸ When considering harms by gang members, themes of criminal offending, family violence, intimate partner violence, and drug or alcohol abuse emerge. While all these elements exist in all communities, they are often overrepresented in gang-affected communities and even more so within gang-affiliated families.

¹⁷ Paul Bellamy, Parliamentary Library research paper, [New Zealand gang membership: A snapshot of recent trends](#), July 2022, Pgs 4-5.

¹⁸ Statistic provided by NZ Police.

88. While gangs are associated with harms from offending that their members commit, some communities and whānau with no history of criminal behaviour have longstanding familial and/or social connections with gang members and gangs.
89. Offending is not unique to gang members, nor necessarily mostly committed by them.¹⁹ An organised criminal group need not be a gang (such as a drug trafficking or money laundering network).

Members of gangs can apply for firearms licences

90. Section 22H of the Act sets out the automatic disqualifying factors which prevent a person from applying for a firearms licence. Being a member of a gang is not an automatic disqualifying factor for a firearms licence.
91. However, section 24A enables the regulator to determine that an applicant is not fit and proper if:
- the person is a member of, or has close affiliations with, a gang or an organised criminal group; or
 - the person is charged with or has been convicted of an offence in New Zealand or overseas that is punishable by a term of imprisonment (i.e., displaying gang insignia in public).²⁰
92. Section 24A provides the regulator with discretionary powers to consider each person's application on a case-by-case basis. For example, if a family member (such as a sibling) is a member of gang, the person may still be considered fit and proper.

What is the policy problem or opportunity?

93. The Minister directed the Ministry to consider whether it is an issue that there are no explicit grounds to disqualify someone from becoming a firearms licence holder if they are a member of a gang. The modernisation of the Act provides an opportunity to reassess the criteria considered when assessing whether an applicant is a fit and proper person to possess a firearm.

What consultation has been undertaken?

94. In early 2025, the Ministry undertook consultation on the Act. Some submitters were in favour of stronger background checks on applicants and supported the idea of including an automatic disqualification of people with a violent criminal history or gang affiliation.
95. The regulator considers the current criteria fit for purpose. In its submission, it noted the ability to apply discretion during a fit and proper person assessment enables tailored

¹⁹ [Toward an understanding of Aotearoa New Zealand's adult gang environment](#), PMCSA, Pg 37, 47.

²⁰ A person commits an offence if they knowingly, and without reasonable excuse, displays gang insignia at any time in a public place; this offence is liable on conviction to a term of imprisonment not exceeding 6 months or a fine not exceeding \$5,000.

interventions for licence holders in line with the levels of risk, the actual or potential consequences, and the behaviour, attitude and capability of licence holders or applicants.

96. The regulator noted an opportunity to include convictions under the Gangs Act in section 22H of the Act. Specifically, if a person is convicted of breaching a non-consorting order under the Gangs Act should be disqualified from holding a firearms licence.

Section 2: Assessing options to address the policy problem

What options are being considered?

Option One – Include gang membership as a disqualifying factor

97. Under this option, gang membership would be added as an automatic disqualifying factor in the Act. In practice, the regulator would check the NGL to identify if the applicant is a gang member. Associates of gangs would not be automatically disqualified.
98. For avoidance of doubt, this change would not be retrospective. That is, the regulator would not be required to review existing firearm licence holders to confirm whether they are gang members. Rather, as the persons licence comes up for renewal, or they are brought to the attention of the regulator, the regulator would reconsider the status of their licence in line with the new disqualifying factor.

Option Two – Status Quo (Ministry preferred option)

99. Under this option, the regulator would maintain discretion to determine if an applicant is fit and proper, taking into account gang membership and association.

Analysis

Difficulty verifying gang membership

100. It is inherently difficult to verify whether someone is a member of a gang. While the National Gangs lists provides the most reliable indication of patched and prospect gang membership, the Gang Intelligence Centre (GIC) advises that it should be used in conjunction with other information. H
101. Without the ability to accurately verify whether someone is a member of a gang, the decision to disqualify someone for being a gang member may provide avenues for applicants to challenge or appeal licensing decisions if the National Gangs List is not accurate.
102. In addition, the NGL is an operational practice, but if used to apply prohibitions could have implications for how the list is created and controlled. For example, people are added to the NGL based on an assumption they are associated with a gang, however this is not a conclusive test. Furthermore, if someone ceases to be associated with a gang, they may struggle to be removed from the list.

Freedom of association

103. Section 17 protects freedom of association. This includes forming or participating in an organisation, to share information and ideas, and to act collectively. This does not protect associations for illegal purposes. The fact that gangs facilitate criminal activity does not

make them illegal. Gang membership may also involve association for legal and pro-social purposes, including political purposes, which do receive the protection of section 17. This has been confirmed by the courts on numerous occasions when considering the legality of bail conditions that prohibit identified gang members from associating.²¹

104. If being a member of a gang were to be an automatic disqualifying factor, it may risk infringing freedom of association. If an individual has not met any other criteria during the fit and proper assessment, it could be unreasonable to restrict their lawful access to firearms and ammunition.

Disproportionate impact on Māori

105. Any interventions that target gang members will have a disproportionate impact on populations that are overrepresented in gangs. Gang membership is known to be concentrated among populations that are on average younger, disproportionately male, live in more deprived communities and Māori.
106. Both options (including the status quo) have a disproportionate impact. However, option 1 will remove the regulators discretion to assess whether the individual (and their associates) pose a risk. Option 1 is likely to result in reliance on the NGL as the source of whether an individual is a gang member. The NGL has known accuracy and system bias issues. Therefore, option 1 raises significant privacy implications which may fall disproportionately on vulnerable populations, including Māori.
107. Gang members and their whānau are also more likely to be victims of crime, so any reduction in gang harms will also benefit these groups by reducing gang access to firearms. For example, women and children related to gang members have a heightened risk of experiencing abuse, and fear of violence (from firearms) may be a barrier to leaving such a relationship.

²¹ See *Paora v R* [2016] NZHC at [32]; *Ross v R* [2021] NZHC 834; *R v Chapman* [2022] NZHC 153 at [20] – [21].

How do the options compare to the status quo/counterfactual?

	Option One – include gang membership as a disqualifying factor	Status Quo
Simple	- There would be no additional requirements for the regulator as they already access the National Gangs List when assessing someone for a firearms licence. It is inherently difficult to verify gang membership. While the NGL provides a reliable indication it is not a source of truth.	0 This option allows the regulator discretion to determine whether someone who is believed to be a gang member is fit and proper to use and possess a firearm. It allows for case-by-case assessment based on the individual. This acknowledges the limitations of the NGL.
Necessary	0 This option does not provide for any additional protections in terms of using firearms for legitimate purposes or meeting the existing character assessment criteria.	0 The regulator already considers gang membership as part of the assessment.
Protects individuals	-- This option may engage the right to freedom of association under the New Zealand Bill of Rights Act. This option raises significant privacy concerns.	0 There is a risk to freedom of association rights if gang membership were the only disqualifying factor.
Protects public	0 Removing the discretion from the regulator to determine a known gang member to determine whether someone is fit and proper may provide an additional safeguard for public safety.	0 This option allows the regulator discretion to determine whether someone who is a known gang member is fit and proper to use and possess a firearm.
Effective and efficient	- The difficulty in verifying gang membership could result in an increased number of appeals.	0 This option provides an additional factor when considering someone's fitness for a firearm licence. The regulator has advised a strong case (i.e., more than one criterion) for why someone is not fit and proper supports their decision.
Overall assessment	- This option may raise Bill of Rights issues, and could result in more appeals, without any significant benefits when compared to the status quo.	0 The regulator considers gang affiliation when determining if an individual is fit and proper.

Key for qualitative judgements:

- ++ much better than doing nothing/the status quo/counterfactual
- + better than doing nothing/the status quo/counterfactual
- 0 about the same as doing nothing/the status quo/counterfactual
- worse than doing nothing/the status quo/counterfactual
- much worse than doing nothing/the status quo/counterfactual

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

108. On balance, the status quo is considered sufficient to meet the overarching policy objectives.
109. The status quo enables the regulator to make a risk-based assessment of whether an individual is fit and proper to use and possess a firearm. The status quo enables the regulator to consider an applicant's association or membership of a gang but will also require the regulator to consider the broader criteria. For example, previous convictions, alcohol and substance use, storage requirements and medical fitness. It provides the regulator to holistically assess whether someone is fit and proper to be granted a firearms licence.

Is the Minister's preferred option in the Cabinet paper the same as the agency's preferred option in the RIS?

110. No. The Minister's preferred option is to include gang membership as a disqualifying factor.

What are the marginal costs and benefits of the preferred option in the Cabinet paper?

Affected groups	Comment	Impact.	Evidence Certainty
Additional costs of the preferred option compared to taking no action			
Regulated groups	Could make it difficult for individuals who are no longer involved with gangs but are still listed on the NGL. Due to external factors (i.e., varying legal fees), we are unable to provide cost estimates for individuals to appeal a decision at the District Court.	Medium N/A	Medium
Regulators	Regulator implementation costs can be covered within the proposed implementation project team.²² Ongoing operational costs can be absorbed within baseline.	Low N/A	High
Others (eg, wider govt, consumers, etc.)	May result in an increased number of appeals to the District Court, or judicial review.	Medium Each case costs the	Medium

²² The rewrite of the Act will have overall implementation cost implications e.g., Information Technology (IT) changes, developing operational guidance, public communications. These changes will require project management. s9(2)(f)(iv)

	appealing a decision with the District Court.	Justice sector between \$300-600. ²³	
Total monetised costs		Low	Medium
Non-monetised costs		Low	
Additional benefits of the preferred option compared to taking no action			
Regulators	Could lead to some time efficiencies if the regulator is able to instantly decline an application.	Low	Medium
Others (eg, wider govt, consumers, etc.)	May provide greater trust in firearms regulatory system.	Medium	Low
Total monetised benefits			
Non-monetised benefits		Medium	Medium

Section 3: Delivering an option

How will the proposal be implemented?

111. The regulator will be responsible for implementing this change. The regulator currently checks the NGL when someone applies for a firearms licence which will notify it of any gang associations. There may be some costs incurred in making the decision to decline applications received, due to people not knowing they are on the NGL, and the regulator needing to ensure its decision is accurate.
112. An individual whose application is declined based on 'gang membership' may deduce they are on the NGL and appeal the decision and their status on the NGL. This is likely to increase administrative burden for both parties. The regulator notes only 18 applications have been refused since 2022 based on gang membership and therefore it is unlikely option 1 is likely to increase the number of gang members applying for firearm licences.

²³ These cost estimates are based on the costs of category 1 and 2 cases, based on 2017/18 budget and disposal data, adjusted for inflation to Q4 2024, and include personnel, operating, property occupancy, depreciation, and capital charged. These estimates exclude Judicial costs and other justice sector expenses (e.g., Police prosecution). These estimates are conservative, as they do not account for other cost drivers like the increased average number of events per case since 2017/18.

Licensing

PART D: Visitors' Licences

Section 1: Diagnosing the policy problem

What is the context behind the policy problem and how is the status quo expected to develop?

113. Overseas visitors who wish to use a firearm without supervision in New Zealand are required to obtain a visitor's firearms licence. Visitors' licences enable visitors to New Zealand to attend hunts or shooting events, while ensuring they are deemed fit and proper to possess a firearm in New Zealand and have appropriate storage arrangements prepared.
114. Currently, the Act provides that a visitor's licence may last up to one year. Regardless of how long a visitor is in New Zealand, section 25(3) of the Act provides a visitor's licence automatically expires whenever the visitor exits the country.

Who can apply

115. To be eligible, the visitor must be aged over 16 years, have a firearms licence or equivalent in their home country (which must have similar firearms safety and licensing practices to New Zealand), be a fit and proper person, live outside New Zealand usually, and plan to visit for less than one year.
116. When considering an application, the regulator must find that the visitor is a fit and proper person, has appropriate storage arrangements for the visit, and has not had a firearms licence revoked or been disqualified from having a firearms licence in their home country.²⁴

Statistics on applicants

117. In the 2023/2024 financial year, 779 visitors' licences were issued, down from 846 in the prior year. Applications come from a wide range of countries:
- Australia: 61 percent of all applications submitted in 2023/2024, and 56 percent in 2022/2023;
 - United States: 20 percent of all applications in 2023/2024, and in 22 percent in 2022/2023; and
 - smaller numbers of applications from other countries, such as Denmark, Canada, and the United Kingdom.

²⁴ Evidence of appropriate storage requirements include details of a current New Zealand firearms licence holder with whom they will store firearms and ammunition. [Before you apply for a visitor's firearms licence | Firearms Safety Authority New Zealand](#)

118. Most visitors only make one application for a visitor's licence per year, although there is a small number of visitors who apply multiple times each year.²⁵ The average number of days a visitor remains in New Zealand is 22.²⁶ Upon leaving New Zealand their visitor's licence expires and if they wish to re-enter the country for shooting purposes they must apply for a new visitor's licence.

What is the policy problem or opportunity?

119. Anyone wishing to enter New Zealand multiple times within one year is required to reapply for visitor's licences each time. This is time-consuming and costly for both the applicant and the regulator. Consultation indicated that the burden of applying for a licence each time they enter New Zealand may be a factor deterring visitors from making multiple trips.²⁷
120. Making the user go through the full fit and proper test multiple times within the same year does not serve a clear public safety benefit. However, the public will want to be assured that all visitors are still licenced in their home country and have secure storage arrangements during their visit.

Comparable jurisdictions

121. Based on international examples from Australia, Canada and the UK, there are two main approaches:
- enabling the regulator to have discretion to determine the length of a licence: (without it automatically expiring upon leaving). It appears these licences are often issued for the duration of the visit, however it gives flexibility to issue them beyond that based on the specific circumstances of each application. The other approach is to have licences for a fixed length of time, allowing a user to enter and re-enter the jurisdiction at any point within that time.
 - Canada has a more varied approach though it is unclear if a similar regime would be viable here, as the import form does not assess a person's fit and proper status, or storage arrangements. Also, as there are likely people who travel here to shoot without bringing their own firearm. For instance, a visitor who is on a hunting trip may borrow a rifle and not be under the immediate supervision of a New Zealand licence holder, and thus would require a visitor's licence. In these circumstances there would still need to be a pathway to obtaining a visitor's licence that does not rely on an import permit.

What consultation has been undertaken?

122. Many submitters supported visitor licences, though some noted that the current process is burdensome and visitors having to reapply each time they enter the country is a barrier

²⁵ In the 2023/2024 financial year, 21 visitors made two applications. Only four people made more than two applications in that year. This trend is similar across the past five financial years (with the exception of 2020/2021 and 2021/2022 in which numbers of applications were very low, as the border was locked down under Covid-19 restrictions).

²⁶ Average over the period of 1 July 2018 to 31 December 2024.

²⁷ Applicants are advised to apply up to four months in advance of arriving in the country which may make multiple applications within the same year more difficult.

for visitors making multiple trips. Other submitters also noted that having to apply four months in advance, as the regulator advises visitors to do, is impractical.

123. The Department of Conservation highlighted the value of visiting hunters and suggested no further restrictions that reduce the appeal of visiting New Zealand. The regulator acknowledged the current process is overly burdensome and made suggestions such as tailoring licences to the purpose of the visit, and enabling multi-entry licences to be issued.

Section 2: Assessing options to address the policy problem

What options are being considered?

Option One – Multi-Entry Licence (preferred option)

124. This option would allow for multi-entry visitor's licences to be issued, allowing the user to exit and re-enter the country multiple times within the given time period (e.g. 12 months), without having their licence expire upon leaving the country.
125. This would be in addition to the status quo whereby the regulator would only grant multi-entry licences in limited circumstance (e.g. for the purposes of attending multiple shooting events). If not granted a multi-entry licence, then the licence still expires under section 25(3) upon leaving the country.

Option Two – Remove licence expiry requirement

126. This option removes section 25(3) of the Act which would mean that visitors' licences do not automatically expire upon the visitor leaving the country. This would give discretion to the regulator to determine the length of an individual's visitor's licence, up to a maximum duration of one year, which is the current maximum length of a visitor's licence under section 25(2) of the Arms Act.
127. The regulator would be able to issue a licence for up to 12 months if there was a specific need. The regulator could tailor the length of an individual visitor's licences based on the specific circumstances of each application (e.g. the applicant has indicated they will be attending multiple shooting competitions in a short period). This provides the most flexibility.
128. The main difference to Option One is the level of discretion given to the regulator. The visitor would still be subject to having approved secure storage and supplying the regulator with any necessary information prior to arrival.

Option Three – Trans Tasman

129. Given that Australia is by far the most common country of origin for visitor's licence applications, this option would allow Australian licence holders to use their firearms in New Zealand, under a streamlined system which requires only the most relevant information such as secure storage arrangements. The applicant would also need to include evidence that they hold an Australian licence.
130. This option is not mutually exclusive and could be done in combination with any of the above options.

Option Four – Status Quo

131. Maintains the current regime. Under section 25 of the Act, visitor’s licences last for a maximum duration of 12 months. Section 25(3) specifies that if a visitor leaves New Zealand prior to their licence expiring, then their licence automatically expires.

How do the options compare to the status quo?

	Option One – Multi Entry licence (preferred option)	Option Two – Remove expiry requirement	Option Three – Trans-Tasman	Option Four – Status Quo
Simple	+ This simplifies the law for users attending multiple events in a short time frame as they will not need to reapply every time to re-enter the country though they will still need to supply some information.	- Giving discretion to regulator may make it less clear as they will have to decide how to implement with limited legislative guidance. It may require more information from the applicant to allow the regulator to decide on the length of an application, but this would not be clear in the legislation.	+ Would make the process much simpler for Australian visitors but not for visitors from other countries.	0 Visitors experience frustration and administrative barriers when navigating the existing system.
Necessary	+ The streamlining of applications supports visitors who wish to use firearms for legitimate purposes.	+ The streamlining of applications supports visitors who wish to use firearms for legitimate purposes.	0 Supports the objective of allowing legitimate use, but with potential damage to the public safety objective.	0 Allows visitor's to use firearms in New Zealand
Protects individuals	0 No significant impact on individual rights and freedoms	0 No significant impact on individual rights and freedoms	0 No significant impact on individual rights and freedoms	0 No impacts on individual rights were identified.
Protects public	0 There is a risk that a visitor on a multi-entry licence may lose their fit and proper status in their home country, but this risk can be mitigated by the regulator checking this upon re-entry.	0 This option gives the regulator more discretion to determine the length of a licence based on specific individual factors, but no clear public safety benefit when compared to status quo.	- Less ability for the regulator to intervene or be aware of issues as less information is required from applicant.	0 Visitors go through a fit and proper check, which requires less than domestic firearms licence holders.
Effective and efficient	+ This would be a relatively simple change in process. The regulator would need to adjust to issuing multi-entry licences but would have the benefit of having less duplicative applications to process	- This is a more significant change in operational practice than other options and may require more work to develop operational guidance. May result in the regulator having less duplicative applications to process.	+ Streamlined applications would achieve greater efficiency as it would reduce the volume of substantive applications to process by over half – however information would still be required from the visitor upon re-entry.	0 Requires the processing of visitor's licence applications for each and every visit. Visitor's are told to apply four months in advance.
Overall assessment	+ Easier process for visitors, with some slight changes to the regulator's processes.	0 The benefits of this option are not clear when compared to status quo or option one.	- This option has significant public safety risks.	0 Visitor's licences expire upon leaving the country.

Key for qualitative judgements:

++	much better than doing nothing/the status quo/counterfactual
+	better than doing nothing/the status quo/counterfactual
0	about the same as doing nothing/the status quo/counterfactual
-	worse than doing nothing/the status quo/counterfactual
--	much worse than doing nothing/the status quo/counterfactual

Is the Minister's preferred option in the Cabinet paper the same as the agency's preferred option in the RIS?

132. The Minister's preferred option in the Cabinet paper matches the Ministry's preferred option in the RIS.

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

133. Option One is the preferred option as this is most likely to address the problem while meeting the overarching policy objectives. This option provides a balance between making the law clear and easy to understand, supporting public safety, and enabling visitors to participate in shooting events in New Zealand with less administrative burden. Providing for a multi-entry system within the legislation provides clarity to visitors and the regulator, while helping alleviate the issue for a wide range of visitors from different countries. While Option Two is similar, it does not provide the same level of legislative clarity that this option provides.
134. This option is in addition to the status-quo, it gives another tool to the regulator to use at their discretion. The default will still be licences expiring upon exiting the country, however this allows the regulator to decide to issue multi-entry licences and determine how long a multi-entry licence should last when they grant them (up to a maximum of 12 months). This could be of use in instances where, for example, a visitor indicates they would like to attend multiple shooting competitions, on multiple trips, within a three-month period.
135. Option three is simpler for the regulator as it would cut down on the volume of substantive applications. However, it has potential public safety impacts, as the regulator would have less information, and would not be required to run the full fit and proper check. It would also not solve the issue for individuals applying from countries other than Australia. This could be mitigated by being done in combination with Option One, however, the potential public safety impacts would remain, hence why this option is not recommended. There are also no current reciprocal arrangements in this space.

What are the marginal costs and benefits of the preferred option in the Cabinet paper?

Affected groups	Comment	Impact	Evidence Certainty
Additional costs of the preferred option compared to taking no action			
FSA	Would need to develop practices for issuing visitor's licences, including considering in what circumstances to issue them. Potentially less cost recovery for multi entrants as the regulator will still need to recheck their licence status without recovering a fee for an application. Based on the number of repeat applicants each year (21 as of	Low	Medium

	2023/2024) this is only expected to be approx. \$750.00 each year. s9(2)(f)(iv)		
Total monetised costs	s9(2)(f)(iv)	Medium	Medium
Non-monetised costs		Low	Medium
Additional benefits of the preferred option compared to taking no action			
Visitors	For those issued multi-entry licences, this provides an easier process with less administrative barriers and saves money from making repeat applications (\$25 per visitor's licence application). This could encourage more visitors to return to the country, which means they will spend more money in the New Zealand economy.	Low	High
FSA	Potential for some efficiencies to be gained as may result in processing less applications. Though as noted above, any efficiencies gained here are likely offset by the need to run checks on returning visitors.	Low	High
Total monetised benefits	Approx \$750.00 reduction in fees for visitors.	Low	Medium
Non-monetised benefits	Potential economic benefits if proposal facilitates an increase in the number of visitors.	Low	Medium

Section 3: Delivering an option

How will the proposal be implemented?

136. The regulator would be required to develop operational policy and guidance to determine how this is implemented. This may require changes to the application form to require that the visitor indicate if they would like to be considered for a multi-entry visitors licence.

This will require an update to systems to multi-entry licences from expiring automatically upon leaving the country. The regulator has indicated that they will need to build a new IT interface with customs and would require broader IT upgrades.