

Regulatory Impact Statement: Firearms Reform – Permits to Possess and Manufacturing (1 of 3)

Decision sought	Analysis produced for the purpose of informing Cabinet decisions
Agency responsible	Ministry of Justice
Proposing Ministers	Hon Nicole McKee, Associate Minister of Justice (Associate Minister)
Date finalised	4 September 2025

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

- Firearms Reform – Permits to Possess and Manufacturing (1 of 3);
- Firearms Reform – Appeal Pathways (2 of 3); and
- Firearms Reform – Offences and Penalties (3 of 3).

The proposals in this suite form part of Phase 4 of the Government’s firearms reform work programme - the rewrite of the Act this parliamentary term. They also form part of a second tranche of policy proposals to rewrite the Act. A first tranche of policy proposals was agreed by Cabinet on 23 June 2025 [CAB-25-MIN-0203 refers].

There are two parts to the proposals in this RIS.

Part A: Permits to Possess focuses on enabling legitimate possession and use of firearms by clarifying that disassembled prohibited firearms are prohibited firearms.¹

Part B: Manufacturing² focuses on enabling those who wish to undertake legitimate firearms activities (such as manufacturing) to be able to do so by encouraging a culture of community safety and support. It proposes a new offence for the possession of digital files with the intention to illegally 3D print arms items.³

¹ Alongside the previous proposals set out in “Regulatory Impact Statement: Firearms Reform – Enabling legitimate possession and use”.

² Alongside the previous proposals set out in “Regulatory Impact Statement: Firearms Reform - Encouraging a culture of community safety and support”.

³ This is one of several new offences proposed as part of the rewrite of the Act. Further detail on the associated penalty and the costs associated with all the changes to offences and penalties are set out in *Regulatory Impact Statement: Firearms Reform – Offences and Penalties (3 of 3)*.

Summary: Problem definition and options

What is the policy problem?

Part A: Permits to Possess

Disassembled firearms

The High Court⁴ has raised concerns about ambiguity in the Arms Act because the definition of firearms includes disassembled firearms, but the ruling was unclear regarding whether the definition of a firearm also applies to specific types of firearms such as prohibited firearms.

Part B: Manufacturing

Emerging technologies, such as 3D Printing

The emergence of new technologies such as 3D printing could make manufacturing more accessible and inexpensive for private individuals. This is likely to result in the private manufacture of more sophisticated arms items in greater numbers, which could have public safety implications due to the lack of regulatory oversight.

What is the policy objective?

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

- supports the 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.

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

The RIS considers:

Part A: Permits to Possess

Disassembled firearms

- Option 1: status quo - lack of clarity on whether a disassembled pistol, prohibited firearm or restricted weapon is considered a pistol, prohibited firearm or restricted weapon.
- Option 2: insert an “avoidance of doubt” clause clarifying that disassembled firearms such as prohibited firearms parts are also considered firearms. (Ministry’s preferred option)
- Option 3: endorsement and permit to possess required for major firearms parts for prohibited firearms and restricted weapons (Associate Minister’s recommended option)

Part B: Manufacturing

Emerging technologies, such as 3D printing

- Option 1: status quo: 3D printing is not specifically regulated

⁴ *New Zealand Police v Cottle* [2024] NZHC 3415 [15 November 2024].

- Option 2: prohibit 3D printing of firearms
- Option 3: only licensed business managers may 3D print firearms
- Option 4: create a new offence for the illegal possession of blueprints or digital files necessary for the manufacture of arms items (preferred option).

What consultation has been undertaken?

The Ministry publicly consulted 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 to change, rather than specific policy proposals. The Ministry received 8,448 submissions.

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

No, the preferred option is not the same in the Cabinet paper and the RIS for:

- Part A Disassembled firearms

Yes, the preferred option is the same in the Cabinet paper and RIS for:

- Part B: Emerging technologies, such as 3D printing

Summary: Associate 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)

Police and the regulator have advised that a Programme Implementation Team would need to be established and in place for two years to manage the overall implementation of the rewrite of the Act, s9(2)(f)(iv)

Part A: Permits to Possess

Disassembled firearms

This option would introduce additional regulatory requirements that may be unnecessary, as the problem could be addressed by other options. Police have advised that the ongoing operating costs for this proposal can be met within baseline as the costs will be offset by the savings associated with other proposals in the Cabinet paper. These are enabling the temporary transfer in the Registry for prohibited firearms, restricted weapons and pistols (see recommendations 5-6).

Implementation costs would be covered by the proposed Programme Implementation Team.

Part B: Manufacturing

Emerging technologies, such as 3D Printing

This proposal is one of several changes to offences and penalties that are considered in the Regulatory Impact Statement: Firearms Reform – Offences and Penalties (3 of 3). The costs associated with all the changes to offences and penalties are set out in that RIS.

The implementation and operating costs of this option are likely to be minimal and cannot be itemised separately from the overall costs of the full package of changes to offences and penalties.

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)

Part A: Permits to Possess

Disassembled firearms

This option will provide clarity that major firearm parts for prohibited firearms and restricted weapons should be treated the same as a complete firearm (receivers and frames).

Part B: Manufacturing

Emerging technologies, such as 3D Printing

This option is expected to provide clarity for the firearms community and non-firearms users. It also creates efficiencies for law enforcement who can prosecute individuals who possess blueprints but have not yet illegally manufactured the arms item.

Balance of benefits and costs (Core information)

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

Part A: Permits to Possess

Disassembled firearms

The additional regulatory requirements to require a permit to possess for major firearms parts for restricted weapons and prohibited firearms are expected to outweigh the benefits. There are alternative options that could address the problem without the additional regulatory controls being introduced, the Ministry's proposed option would not result in any additional operating costs.

Part B: Manufacturing

Emerging technologies, such as 3D Printing

The additional clarity and efficiencies created by this option are expected to outweigh the minimal marginal implementation and operating costs.

Implementation

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

The regulator will be responsible for updating guidance material and updating the firearms community on the proposed changes.

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 policy proposals being developed [CAB-24-MIN-0158 refers]
- the Ministry was undertaking a large reform programme within a short timeframe, which limited the amount of time it could consider individual topics;
- the Associate Minister provided direction on what proposals she wanted to receive advice on. This limited our ability to consider alternative options.

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 option.



**Kathy Brightwell General Manager,
Civil and Constitutional Policy
Ministry of Justice
04/09/2025**

Quality Assurance Statement

Reviewing Agency: Ministry of Justice

QA rating: Meets.

Panel Comment: A Panel within the Ministry of Justice has reviewed three Regulatory Impact Statements for consistency with the quality assurance criteria.

The Panel concluded that papers 1 (Permits to Possess and Manufacturing) and 2 (Firearms Reform – Appeal pathways) meet the quality assurance criteria.

Paper 3 (Firearms Reform – Offences and penalties) partially meets the quality assurance criteria. The panel considered the statement to be complete and the result of adequate consultation. The statement is partially convincing. It applies a consistent analysis framework but compares only a limited number of high-level options against the status quo and is not consistently clear about the rationale for specific changes to penalty levels.

Introduction to Firearms Reform – Permits to Possess and Manufacturing

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.
2. This Regulatory Impact Statement (RIS), Firearms Reform – Manufacturing and Permits to Possess is the first of a suite of three RIS which contain proposals to strengthen these settings and reduce unnecessary compliance burdens that do not support public safety.
 - a. Firearms Reform – Permits to Possess and Manufacturing (1 of 3);
 - b. Firearms Reform – Appeal Pathways (2 of 3); and
 - c. Firearms Reform – Offences and Penalties (3 of 3).
3. The proposals in this suite of RIS form part of Phase 4 of the Government’s firearms reform work programme - the rewrite of the Arms Act this parliamentary term. They form part of a second tranche of policy proposals. A first tranche of policy proposals was agreed by Cabinet on 23 June 2025 [CAB-25-MIN-0203 refers].
4. The following proposal focuses on enabling legitimate possession and use of firearms (Part A):⁵
 - a. clarify that disassembled prohibited firearms are prohibited firearms.
5. The following proposal in this RIS focuses on encouraging a culture of community safety and support for legitimate firearms activities (such as manufacturing) (Part B):⁶
 - a. creating a new offence for the possession of digital files with the intention to illegally 3D print arms items.

What objectives are sought in relation to the policy problems?

6. 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:
 - a. supports the safe possession and use of firearms and other weapons for legitimate purposes (e.g. sport, hunting, collecting and pest control); and
 - b. imposes controls that protect individual and public safety from firearms-related harm.

⁵ Alongside the previous proposals set out in “*Regulatory Impact Statement: Firearms Reform – Enabling legitimate possession and use*”.

⁶ Alongside the previous proposals set out in “*Regulatory Impact Statement: Firearms Reform - Encouraging a culture of community safety and support*”.

What general consultation has been undertaken?

7. 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.
8. 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.
9. The Ministry also engaged with other government agencies including the New Zealand Police, Firearms Safety Authority (FSA), New Zealand Defence Force, Department of Conservation, Ministry for Primary Industries, New Zealand Customs Service, and Ministry for Culture and Heritage.
10. 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?

11. The options have been considered against the criteria set out in the policy framework for firearms reform provided to Cabinet in May 2024 [CAB-24-MIN-0158 refers], to ensure the proposals are:
 - **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?

12. 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?

13. 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 (in 2030).

Part A: Permits to Possess

Introduction to Permits to Possess

14. The proposal in Part A focuses on enabling legitimate possession and use of firearms. They should be read alongside the previous proposals agreed by Cabinet that were set out in “Regulatory Impact Statement: Firearms Reform – Enabling legitimate possession and use”.
15. Part A considers regulatory proposals related to disassembled firearms.
16. This Part provides some overarching background before dealing with the above issue.

Section 1: Diagnosing the policy problem

Endorsements and permits to possess are required to possess higher risk arms items.

17. If a person wants to possess any firearm or arms item other than those allowed on a standard firearms licence, they must apply for an endorsement on their licence. Endorsements are approvals to possess higher-risk arms items in a specified capacity and are intended to enable people to undertake particular activities, such as dealing, collecting, theatrical activities, or pest control. A person then must obtain a permit to possess these arms items, which attaches to their endorsement.
18. This section outlines what endorsements are for and how they differ from the permit to possess. The focus of the endorsement is on whether the person is fit and proper to hold the type of the firearm. Whereas, the focus of the permit to possess is to ensure that the specific item can appropriately be held on the endorsement.

The types of endorsements in the Arms Act

19. The Act provides for two categories of endorsements:
- a. **section 29:** an endorsement in respect of a pistol or a restricted weapon;⁷ and
 - b. **section 30A:** an endorsement in respect of prohibited firearm or prohibited magazine.⁸
20. Depending on the category, the regulator must consider different criteria and factors before granting an endorsement under either sections 29 or 30A. A firearm can only be

⁷ [Arms \(Restricted Weapons and Specially Dangerous Airguns\) Order 1984 \(SR 1984/122\) \(as at 11 December 2013\) Schedule Weapons declared restricted weapons – New Zealand Legislation.](#)

⁸ As defined in section 2A and 2B of the Arms Act.

used for the specified capacity for which the endorsement is granted. For example, a pistol could be used for target shooting or in a collection, but not both concurrently.

21. In 2019, the prohibited firearms and prohibited magazines endorsement (section 30A) was created as part of the response to the terrorist attack on Christchurch masjidain. This new endorsement type and can only be issued to licence holders who meet the criteria of an exempt person⁹.

Applying for an endorsement

22. The Act and Arms Regulations 1992 provide that an application for an endorsement must be made on a form provided by the regulator (hard copy or electronically). Forms are based on the specified capacity (e.g. as a collector or for use in target shooting) under which an applicant wishes to obtain a prohibited firearm or prohibited magazine. The applicant must provide the regulator with information about why those firearms and magazines are needed and their ability to safely possess, use, or supervise the use of those firearms.

Number and groups of endorsements

23. In April 2025, there were 6,514 licence holders who held an endorsement on their firearms licence. The endorsement groups are set out in Table 1 below.

Table 1: Number of licence holders in each specified capacity

Specified capacity	Number of licence holders in each category
Collectors	2,957
Dealer employees	228
Dealers	217
Licence holder who holds a memento/heirloom	469
Pest controllers	317
Pistol target shooters/pistol club members	3,797
Theatrical	145

Overseas jurisdictions

⁹ Section 4A of the Arms Act defines who is an exempt person and therefore eligible to apply for a prohibited firearm or prohibited magazine endorsement. This includes dealers, collectors, theatrical armourers and pest controllers.

24. Endorsements are used in other jurisdictions to manage and monitor the use and possession of higher-risk products by licence holders in their specified capacities. Australian states use endorsements in a similar way to New Zealand.¹⁰ Their endorsements have specific conditions depending on the type of arms item and the reason for requiring it. Following an endorsement being granted, the regulator considers the specific item proposed to be acquired against the conditions of the endorsement.
25. Other jurisdictions, such as Ireland¹¹ and Canada,¹² do not use endorsements to monitor and regulate the use of higher risk products. Instead, these jurisdictions achieve the same outcome through different regulatory measures such as conditions and special licences.

A permit to possess is also required to possess a prohibited firearm or prohibited magazine, pistol or restricted weapon

26. A permit to possess is official approval to buy or receive certain firearms products within New Zealand.¹³ The permit allows a person to buy or receive a specific product within a one-month period. Once the product is acquired, the permit expires and the specific firearm is listed on the endorsement.
27. An application for a permit to possess provides the opportunity for the regulator to assess whether it is appropriate for the endorsed licence holder to possess further prohibited firearms, prohibited magazines, pistols, Pistol Carbine Conversion Kits (PCKs) or restricted weapons. This assessment is based on their secure storage and other regulatory conditions on their endorsement as required in sections 31A-33A of the Arms Act and Regulation 28- 28AAA of the Arms Regulations 1992.
28. An application for a permit to possess may be declined if the regulator determines that the item requested is not consistent with a person's endorsement and/or they do not have an appropriate reason to acquire it. The regulator may also decline a permit to possess if it does not have sufficient information to determine whether the item has previously been owned illegally and/or used for criminal purposes.
29. The current process is paper-based:
 - a. The regulator processes the permit application within five working days, provided the application form was completed correctly.
 - b. Once a permit has been issued and the licence holder has taken possession of the firearm they must update the regulator through inputting possession into the Firearms Registry.

¹⁰ Such as endorsement to possess or use prohibited firearms for sport or target shooting (s 275 of the Firearms Act 1996 (ACT)); use pistols for sport, business or employment, or firearms collection (ss 16-17 of the Firearms Act 1996 (NSW)).

¹¹ Ireland (Firearms Act 1925): relies on adding conditions to its firearms certificates to achieve the same purpose as endorsements.

¹² Canada (Firearms Act 1995): 'registration certificates' are issued for possession of a prohibited firearm or a restricted weapon (s 12).

¹³ A permit to import performs this function when the product is bought or received from overseas.

- c. The current process to transfer possession of the firearm(s), is via the licence holder contacting the regulator's call centre. However, in 2027, a digital transfer functionality is expected to come into force that will enable digital transfers to occur within the Registry. This will relieve some of the manual processes that may be considered by some license holders to be a regulatory burden.

New Zealand requirements are aligned with similar jurisdictions

- 30. United Kingdom has similar permits to possess requirements to New Zealand, but requires a permit to acquire both standard firearms and endorsed firearms. Those who are required to obtain a permit include a firearms dealer, an auctioneer, pest control, sports or other approved activities, and may use this for the purpose of carrying out that business or activity (ss 8-12 of the Firearms Act 1968).
- 31. Australia also has similar provisions: permits are required for dealer employees and permits are required to carry or use firearms held under a collector's licence (ss 55 and 58 of the Firearms Act 1996). These jurisdictions also have tighter controls and require the item to be purchased from a dealer, as they do not allow private sales of firearms.

Disassembled Firearms

Background to disassembled firearms

32. Currently a permit to possess is only required when a licence holder acquires a prohibited firearm, prohibited magazine, PCCK, restricted weapon or prohibited magazine.
33. A recent High Court case¹⁴ highlighted that there is ambiguity regarding whether the definition of a prohibited firearm in the Arms Act includes dismantled or partially dismantled prohibited firearms.
34. Prohibited firearm endorsements are required when possessing prohibited firearm parts under section 2C (“meaning of prohibited part”) of the Arms Act, but only a complete prohibited firearm requires a permit to possess. This was to minimise the regulatory burden on licence holders. However, there are additional regulatory requirements for major firearm parts¹⁵ as they need to be registered following an activating circumstance, such as buying a new firearm. The additional registration requirement for major firearm parts is due to a major firearm part being a key component for the operation of the firearm.
35. The High Court heard while the defendant was legally entitled to have possession of the prohibited parts due to holding the necessary licence and endorsement, there was ambiguity about whether a permit to possess and registration was required when the prohibited firearm was disassembled as it could be interpreted as a group of prohibited parts stored together. That tension is the result of ambiguity in the interpretation of the definition of a prohibited firearm compared to the definition of a firearm.
36. Following the High Court decision, Crown Law has recommended clarifying the ambiguity and whether the definition of a “firearm” (which includes disassembled firearms) applies to pistols, prohibited firearms and restricted weapons.

What is the policy problem or opportunity?

37. The High Court has raised concerns about ambiguity in the Act because the definition of a “firearm” includes disassembled firearms, but it was not clear whether the definition of a “firearm” applied to other specific types of firearms such as prohibited firearms and therefore whether a permit to possess and registration is required when a prohibited firearm has been disassembled.
38. The Associate Minister considers that there is an opportunity to remove this ambiguity by treating major firearm parts for prohibited firearms and restricted weapons the same as an entire prohibited firearm.

What consultation has been undertaken on this topic?

¹⁴ *New Zealand Police v Cottle* [2024] NZHC 3415 [15 November 2024].

¹⁵ **Major firearm part** is defined as the action (frame, receiver, or upper receiver and lower receiver) of a firearm, the frame of a pistol, or a calibre conversion component or kit of a pistol.

39. No feedback was received as part of the consultation on this ambiguity. Some submitters raised concerns about the need for permits to possess now that the Registry is being implemented. Submitters generally agreed that prohibited firearms should be recorded in the Registry.
40. The Ministry of Justice discussed the High Court decision with Police and Crown Law. Police and Crown Law recommended that an avoidance of doubt clause be added to clarify that disassembled firearms such as prohibited firearms parts are also considered firearms.

Section 2: Assessing options to address the policy problem

What options are being considered?

Option 1: Status Quo

41. Under the status quo there is ambiguity on whether a disassembled prohibited firearm is a prohibited firearm. This means that a prohibited firearms endorsement holder could potentially hold a disassembled firearm including major prohibited firearm parts without a permit to possess. This option would not address the lack of clarity.

Option 2: Insert an “avoidance of doubt” clause to include prohibited firearms and restricted weapons in the definition of a firearm (Ministry’s recommended option)

42. This option would clarify in the Arms Act that a disassembled firearm that is classified as a prohibited firearm or restricted weapon is a complete firearm. This would ensure alignment between align with the existing definition of a “firearm” which includes disassembled standard firearms and the definition of a prohibited firearm and restricted weapon.

Option 3: Endorsement and permit to possess required for major firearms parts for prohibited firearms or restricted weapons (Associate Minister’s recommended option)

43. An alternative option that was suggested by the Associate Minister would be to treat major prohibited firearm parts as the same as a complete prohibited firearm or restricted weapon¹⁶
44. This would effectively mean that an endorsement and permit to possess would be required for major firearms parts, such as receivers, for prohibited firearms and restricted weapons. Both the endorsement and permit to possess would be required to ensure that the regulator is aware when a person holds or acquires the parts through domestic transfers.
45. There would not be any change to the existing requirements under section 2C and 19B for minor prohibited firearm parts under this option.

¹⁶ Arms (Restricted Weapons and Specially Dangerous Airguns) Order 1984.

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

	Option 1: Status Quo	Option 2: Insert an “avoidance of doubt” clause in the definition of firearm to include disassembled prohibited firearms and restricted weapons (Ministry’s preferred option)	Option 3: Endorsement and permit to possess required for major firearms parts for prohibited firearms or restricted weapons (Associate Minister’s recommended option)
Simple	0 The High Court decision has shown that this current definition is open to ambiguity and not simple to understand.	+	- This option would introduce the requirement for a permit to possess for major firearm parts for prohibited firearms and restricted weapons. This would place additional regulatory requirements on licence holders when they obtain new major parts for restricted weapons or prohibited firearms.
Necessary	0 Under the status quo there is ambiguity that could be addressed.	++ It is necessary that the Act is simple and easy to understand to enable compliance.	+ This proposal would clarify that major firearm parts are an essential part of a firearm. However, other options could address this issue without introducing additional regulatory requirements and costs.
Protect individuals	0 There will be no changes to the current user experience.	0 There would be no changes to the current user experience.	- This would introduce a requirement for a permit to possess for those who acquire additional major firearm parts for prohibited firearms or restricted weapons.
Protect public safety	0 This current ambiguity has resulted in confusion on how the obligations apply to users.	+ If the Act is easier to understand, then this would enhance public safety.	++ If the Act is easier to understand, then this would enhance public safety. It will also ensure that the FSA has the opportunity to decline an application for a firearm licence holder to acquire a major firearm part for a prohibited firearm or restricted who may not have a reason to hold it.

Effective and efficient	0 Confusing definitions are not effective or efficient.	+ If the Act is easier to understand then this would result in efficiencies. This option can be implemented without any additional costs.	0 If the Act is easier to understand, then this would result in efficiencies. However, this option may have unintended consequences for those who want to store a vital part at another licence holder's premises, given that receivers are a type of vital part.
Overall assessment		++ This option removes ambiguity without adding additional regulation.	+ This option removes ambiguity and increases public safety controls. However, it also has additional costs for government and licence holders.

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

- 46. The Ministry recommends Option 2 as we consider it is the simplest solution, with the least regulatory burden on users while supporting public safety outcomes. Permits to possess are currently required for pistols, restricted weapons, prohibited firearms and prohibited magazines, but are not required for any type of firearm parts.
- 47. The introduction of permits to possess for major firearm parts for prohibited firearms and restricted weapons (Option 3) would introduce additional regulatory requirements to these endorsed licence holders.
- 48. It is considered appropriate that major firearm parts have more regulatory requirements than other firearm parts given the need for major firearm parts to be registered as they are a key component of an operational firearm. However, the ambiguity raised by the High Court could be addressed through Option 2 without adding any additional regulatory requirements to major firearms parts for prohibited firearms and restricted weapons.

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

- 49. No, the Associate Minister's preferred option is to treat major firearm parts for prohibited firearms and restricted weapons the same as a complete firearm.

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	This change would introduce a requirement for licence holders to apply for a permit to possess a major prohibited firearm part. This would only impact those acquiring new major firearm parts such as receivers or frames. The impact is low as only a small number of licence holders have the relevant endorsements to acquire a prohibited firearm part.	Low	Medium
Regulator	Implementing this proposal will require the regulator to update website content, communicate to licence holders, create new forms, letters and correspondence, train staff, and update internal policies. There will be ongoing operating costs for the regulator due to processing applications for the new permits to possess for major parts for prohibited firearms and restricted weapons. This activity could be cost recovered. Police consider these operating costs can be	Estimated implementation costs for this option cannot be itemised. They are included as part of a proposed Programme Implementation Team manage the overall implementation of the rewrite of the Act s9(2)(f)(iv)	Medium

	met from within baseline, because the costs will be offset by cost savings from other proposals (temporary transfers of pistols, restricted weapons and prohibited firearms (Recommendations 5-7 of the Cabinet paper)).		
Total monetised costs		Medium	Medium
Non-monetised costs		Low	Medium
Additional benefits of the preferred option compared to taking no action			
Regulated groups	There is more clarity that receivers are a key part of the prohibited firearm or restricted weapon by having the same requirements as a complete firearm.	High	Medium
Regulators	There will be more clarity in the Act to make it easier for the regulator to enforce.	High	High
Non-monetised benefits		High	Medium

Section 3: Delivering an option

How will the proposal be implemented?

50. The Regulator would need to update their guidance and forms to require permits to possess for major prohibited firearms parts. No changes are required to the Registry as major firearm parts are already required to be registered.

Part B: Manufacturing

51. The proposal in Part B should be read alongside the previous proposals agreed by Cabinet that were set out in “Regulatory Impact Statement: Firearms Reform – Encouraging a culture of community safety and support”. This proposal focuses on encouraging a culture of community safety and support for legitimate firearms activities (such as manufacturing).
52. Emerging technologies such as 3D printing have been identified through consultation and our analysis as a key issue related to the manufacture of firearms. This Part provides some background on how manufacturing is regulated before dealing with the above issue.

Background

Who can manufacture

53. The Act regulates the manufacture of firearms and other arms items differently depending on who is manufacturing:
 - a. licensed firearms owners can manufacture most arms items they are legally able to possess, provided the items are intended for personal use only. Licensed firearms owners are not able to manufacture prohibited arms items; and
 - b. dealers who have been licensed for manufacture are the only people allowed to manufacture for someone else, regardless of whether money changes hands. Only a limited class of dealers are permitted to manufacture prohibited arms items.¹⁷
54. The process to obtain a firearms licence focuses on assessing whether the applicant is a fit and proper person to possess arms items, and whether they have appropriately secure storage facilities. It does not include any assessment of the applicant’s ability to manufacture arms items safely.
55. In contrast, the process to obtain a dealer’s licence includes an assessment of whether the applicant has the competencies and resources to carry out the activity for which the licence is sought (i.e. if the dealer licence is sought for the purpose of manufacturing, the applicant’s competency and resources to manufacture will be assessed). This assessment is made by the Regulator on a case-by-case basis, and an applicant’s competency and resources are not measured against any formal standard or qualification requirement.
56. There are currently:
 - a. 228,566 licensed firearms owners¹⁸ (who can manufacture for personal use); and
 - b. 87 dealers licensed for manufacture under ss 5(1)(e) and (f)¹⁹ (who can manufacture for others).

¹⁷ Exempt persons under section 4A(1A) or (1B) of the Act

¹⁸ As of May 2025.

¹⁹ As of February 2025.

What can be manufactured

57. “Arms items” is a defined term that includes a wide range of different parts that perform different functions (from entire firearms and essential parts such as receivers through to more minor parts such as accessories and grips).
58. The Act makes no regulatory distinction between the manufacture of different arms items within the same product class²⁰ (i.e. the manufacture of a grip is regulated the same as a receiver if they are both parts for a standard category firearm). We note that the risk to personal safety if an item is not made well is greater for some arms items than others.
59. The process steps that must be followed to manufacture depends on the product class of the arms item in question. The Act does not require any quality assurance processes or assessment for manufactured items (whether manufactured for supply or personal use) but the extent to which this is an issue is unclear.

How arms items can be manufactured

60. There are a range of different methods that can be used to manufacture arms items, from traditional tooling and machining, through to emerging technologies such as 3D printing. The Act takes a method-agnostic approach to regulating manufacture and does not prescribe how an arms item must be made.

International comparisons

Overall

61. New Zealand’s overall approach to regulating manufacturing is relatively permissive compared to similar jurisdictions such as Australia, Canada and the United Kingdom.
62. The key difference is that New Zealand allows licensed firearms owners to manufacture arms items for personal use, whereas these other jurisdictions only allow licensed dealers (or equivalent) to manufacture arms items.

3D printing

63. Australia, Canada and the United Kingdom primarily regulate alternative methods of firearms manufacture (such as 3D printing) through their general controls on manufacturers. However, these jurisdictions also either have in place or are considering additional controls relating to the possession and distribution of digital blueprints necessary to 3D-print firearms.
64. In Australia, approaches to digital blueprints vary by state. New South Wales and Western Australia have introduced offences relating to possession and distribution, while Victoria, Queensland, and Northern Territories continue to rely on their general authorisation frameworks to regulate 3D printed firearms. Canada recently passed legislation (former Bill C-21) creating offences prohibiting the possession and distribution of computer data for use in illegal firearms manufacturing. The UK has a bill (Criminal Justice Bill 2023) going through Parliament which would create an offence of possessing a 3D printer

²⁰ “Product classes” include standard category, pistols, prohibited items and restricted weapons.

template for a firearm as long as there is a reasonable suspicion of it being used in connection with a serious offence.

The UN Firearms Protocol

65. Some of the changes made to the Act through the Arms Legislation Act 2020 (in particular the introduction of offences relating to illegal manufacture²¹) were intended to bring New Zealand more in line with international best practice and to help facilitate New Zealand signing up to the UN Protocol Against the Illicit Manufacturing of and Trafficking in Firearms, Their Parts and Components and Ammunition (the UN Firearms Protocol).
66. New Zealand has not yet signed or ratified the UN Firearms Protocol. We note that as part of Phase 2 of the Government's firearms reform work programme, the Arms (Shooting Clubs, Shooting Ranges and Other Matters) Amendment Act 2025 made changes to the way ammunition sales are regulated. An effect of these changes was that New Zealand became further out of step with international best practice and no longer meets the minimum legislative requirements to be able to sign or ratify the UN Firearms Protocol.²²

3D printed firearms

Section 1: Diagnosing the policy problem

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

67. Emerging technologies (3D printing being the most notable example) and methodologies mean that there are an increasing number of ways to manufacture firearms and other arms items. The Act is currently agnostic on methods of manufacture and focuses instead on who is manufacturing and the items that are manufactured.
68. As such, the Act does not specifically regulate 3D printing firearms. It is lawful to print a 3D firearm or other arms items under both a standard licence (for personal use) and a dealer's licence – provided all other controls around manufacturing are complied with. There is also currently no legislation prohibiting persons in NZ from being in possession of or distributing 3D weapon imagery and files (which are a necessary component of 3D printing).

What is the policy problem or opportunity?

3D printed firearms generally

²¹ Section 55D of the Arms Act.

²² Acceding to the Firearms Protocol requires States to have: a system of government authorisations or licensing intending to ensure legitimate manufacturing of, and trafficking in, firearms; an effective system of control over the import and export of firearms, and measures relating to arms brokering; measures relating to the marking, tracing, confiscation, reactivation and security of firearms; and criminal offences for illegal manufacturing of, and trafficking in firearms.

69. Historically, manufacturing arms items required a level of expertise, skill and resource that acted as a natural barrier to widespread proliferation of homemade arms items.
70. The emergence of 3D printing has the potential to lower that barrier for private individuals by making manufacturing simpler, more accessible and inexpensive. Acquiring 3D printing technology and materials is simple and relatively affordable, the level of skill and expertise required is lower than for traditional manufacturing methods, and there is a lot of easily accessible information and communities online to help build a person's capability.
71. The extent of legally 3D printed firearms or other arms items in New Zealand is not yet clear. However, the possession of 3D printing technology (for any purpose) is becoming relatively commonplace, and this is likely to result in the private manufacture of more sophisticated arms items in greater numbers. There is a risk that this may undermine Police's ability to detect and determine when arms items have been illegally manufactured and increase the likelihood of arms items being supplied to unlicensed individuals.
72. Police have noted an increase in the seizure of 3D printed firearms linked to illegal firearms activity (although non-3D printed firearms are still more commonly used). Offenders found in possession of these firearms often included those with known gang links or involvement in criminal adjacent activity. While the intended use of these seized 3D printed firearms is often unclear, Police consider it is almost certain that some were manufactured for the purpose of sale.
73. Some 3D printed firearms seized by Police were designed to closely resemble children's toys and were not immediately recognisable as firearms. Concerns have also been raised about the inability to trace 3D printed arms items or detect them using x-rays or metal detectors (due to them often containing far less metal than firearms manufactured by more traditional means).

3D blueprints or digital files

74. Although the Act provides an offence for unlawful manufacturing, it does not capture the possession of 3D firearms blueprints or digital files for the purpose of manufacturing a firearm. We consider that this is a regulatory blind spot that limits Police's ability to effectively disrupt illicit manufacturing of firearms.
75. We note that there are other tools available to regulate the possession of these types of documents. For example, the Classifications Office has recently classified four specific 3D printing firearms blueprints as 'restricted' under the Films, Videos, and Publications Classification Act 1993 (the Classification Act).
76. However, while the Classification Act may be an effective tool to restrict public access to specific 3D printed firearms blueprints, we do not consider that it is a useful catch-all mechanism for firearm regulation. The Classification Act operates on an individual publication basis and would not allow for a blanket classification of blueprints for 3D printed firearms as a 'class' of publications. If parts of the publication change (such as a

few words within the document) then it is considered a new publication and must be classified again. We note that AI tools already exist that can easily make minor changes to publications to circumvent classifications.

What consultation has been undertaken on this topic?

77. Submitters from public consultation showed support for the current method-agnostic approach to regulating manufacturing, with many licensed firearms owners valuing the ability to use different methods to legally manufacture their own firearms parts for personal use. Several submitters also noted that the pace of technological change would make efforts to ban 3D printed firearms/3D printing redundant.
78. The regulator has suggested that the legislation should introduce new offences that regulate the use and possession of firearm digital design files without a lawful reason. Other submitters also shared this view, with some suggesting that the possession of firearm digital design files should be limited to licenced dealers.

Section 2: Assessing options to address the policy problem

What options are being considered?

79. Officials have considered the following options to address this issue:
 - a. **Option 1:** status quo. 3D printing is not specifically regulated (as described in paragraphs 85-94 above);
 - b. **Option 2:** prohibit 3D printing of firearms and other arms items;
 - c. **Option 3:** restrict 3D printing of firearms and other arms items to licensed business managers;
 - d. **Option 4:** make it an offence to possess blueprints or digital files with the intent to illegally manufacture firearms or other arms items (preferred option).
80. We note that time constraints have limited our ability to consider more specialised options related to 3D printing, such as requiring all firearms to contain enough metal to be detected by x-ray or metal detectors.
81. We consider that options such as this could be further explored as part of a future work programme as the scale and nature of the issues presented by 3D printed firearms (and effective methods of addressing those issues) becomes clearer both within New Zealand and international contexts.

Option 2: prohibit 3D printing of firearms and other arms items

82. Under this option, 3D printing would be banned as a method of manufacture for firearms and other arms items.

Analysis

- 83. This option is simple and easy to understand. There may be public safety benefits in limiting the extent of manufacture that occurs as it would reduce the risk of 3D printed firearms being supplied to unlicensed individuals.
- 84. However, we consider that it would be inconsistent with the overall approach to regulating manufacture, would be very difficult to enforce and arguably goes further than is necessary to address the policy issue.
- 85. 3D printing has many legitimate uses and some of the materials used for 3D printed firearms, such as the polymers, are also used to make other (non-firearms related) products. Effectively prohibiting 3D printing firearms manufacture would require cooperation with other agencies and private retailers to regulate the various points that relate to 3D printing (such as printers, materials, inks, blueprints, manuals, and access to platforms and forums). Given this, specifically regulating the possession of 3D printers or the materials they use would be challenging.
- 86. We also note that 3D printed arms items themselves are not necessarily an issue, and that 3D printing is likely a safer alternative to other 'improvised' methods of manufacture²³ (as 3D printing leaves less room for human error).
- 87. This option is also unlikely to be an enduring solution. While 3D printing is a current issue, other technologies around manufacturing are likely to emerge in the future and a regulatory approach that focuses on specific methodologies may struggle to adapt.

Option 3: restrict 3D printing of firearms and other arms items to licensed business managers

- 88. This option would specifically regulate 3D printing of arms items by restricting 3D printing of arms items to licensed business managers – ie only licensed business managers would be able to use 3D printing as a method of manufacture. All other methods of manufacture would be available to licensed firearms owners for personal use.

Analysis

- 89. Licensed business managers are subject to more levels of scrutiny than licensed firearms owners and there may be public safety benefits associated with restricting 3D printing to this class of individuals. Police support this option and consider it to be a balanced approach to dealing with this emerging issue.
- 90. However, we note that the scale and nature of the issues presented by 3D printed firearms in a New Zealand context when compared to other methods of manufacture are still not clear. Restricting one method of manufacture but not others without a solid policy rationale may have perverse outcomes (noting our previous comment that 3D printing is likely a safer alternative to other 'improvised' methods of manufacture).

²³ For example, homemade firearms manufactured from household items.

91. Restricting 3D printing to licensed business managers would not align with the overall approach under the Arms Act to allow licensed firearms owners to manufacture arms items for personal use (noting that submissions from the firearms community strongly supported retaining the ability to manufacture for personal use).
92. New Zealand's distance from international markets can make acquiring arms items prohibitively costly and care should be taken to ensure policy responses do not incentivise unsafe methods of manufacture, stifle innovation or drive-up costs.

Option 4: create an offence to possess blueprints or digital files with the intent to illegally manufacture firearms or other arms items (preferred option)

93. Under this option, the new legislation would create an offence for the possession of digital files or blueprints with the intent to illegally manufacture arms items. It would not be an offence to possess digital files or blueprints with the intention to 3D print an arms item that the person is legally able to manufacture.
94. By way of example, under this option it would be an offence for:
 - a. a person who does not hold a firearms licence to possess digital files or blueprints with the intention of manufacturing any arms item
 - b. a licensed firearms owner to possess digital files or blueprints with the intention of manufacturing an arms item they are not legally able to possess²⁴ or manufacture²⁵
95. The option builds on existing offences in the Arms Act related to unlawful manufacturing by extending the law to also capture 3D firearms digital files or blueprints.
96. Variations of this option could also be implemented alongside each of the other options considered. If Option 2 (banning 3D printing of firearms) was also implemented, it would be an offence to possess digital files or blueprints with the intention of 3D printing arms items. If Option 3 (restricting 3D printing of firearms to licensed business managers) was also implemented, it would be an offence to possess digital files or blueprints with the intention of 3D printing arms items without holding a business manager's licence.

Analysis

97. We consider that this option would be simple to implement and provides a mechanism to regulate the unlawful possession of digital files and blueprints and allows for more proactive law enforcement to make it harder for individuals to illegally manufacture firearms.
98. We note that other comparable jurisdictions have similar offences (see paragraph 82) and this option brings New Zealand more in line with the way they regulate printing 3D firearms and possession of 3D firearms blueprints and digital files.

²⁴ For example, a pistol or restricted weapon if they do not hold the appropriate endorsement.

²⁵ For example, a prohibited item

99. We consider that careful drafting will be required for the definitions of digital files and blueprints to ensure that the legislation is not so prescriptive as to be easily circumvented, or so broad as to inadvertently capture too wide a range of publications. International examples will be able to be used as a basis for drafting.
100. Including a requirement for intent to illegally manufacture will help avoid people being prosecuted for accessing documents inadvertently or out of curiosity. We note that Police have expressed concern that needing to prove intent may make proving the offence challenging. However, we consider that it is appropriate given the relatively significant penalty associated with the offence (up to 10 years imprisonment).
101. Note that this is one of several new offences proposed as part of the rewrite of the Act. Further detail on the associated penalty and the costs associated with all the changes to offences and penalties are set out in Regulatory Impact Statement: Firearms Reform – Offences and Penalties (3 of 3).

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

	Option 1 – Status Quo	Option 2 – prohibit 3D printing firearms	Option 3– restrict 3D printing to licensed business managers	Option 4 – offence to possess blueprints or digital files with the intent to illegally manufacture firearms or other arms items
Simple	0 Treats 3D printing the same as other methods of manufacture. Clear and easy to understand.	0 This option is clear and easy to understand but enforcement would likely be challenging, given the legitimate uses for 3D printing.	- This option introduces complexity by restricting the use of some methods to licensed dealers, but not others.	+ Simple and easy to understand and provides clarity for the firearms community and non-firearms users on the use and possession of digital files and blueprints.
Necessary	0 Does not achieve greater protection of public safety as it does not respond to the emerging issues associated with 3D printing.	- Goes further than is necessary to achieve government objectives. There are likely to be some benefits associated with 3D printing that would not be available under this option.	0 Provides additional oversight with possible public safety benefits. However, it is not yet clear whether 3D printing requires more regulation than other methods.	+ Retains the status quo of licence holders lawfully being able to use and possess digital files and blueprints, and clarifies that non-licence holders cannot possess these files/documents necessary to manufacture arms items.
Protect individuals	0 No change to individual's ability to use 3D printing technology.	-- Likely to be seen as controversial and a disproportionate response to 3D firearms by the firearms community. Likely to stifle innovation and drive-up costs for firearms products. May also incentivise more unsafe methods of manufacture.	- May drive-up costs for firearms products. Likely to be seen as controversial and a disproportionate response to 3D firearms by a proportion of the firearms community. May also incentivise more unsafe methods of manufacture.	0 Small risk that offence would capture people who access documents out of curiosity is mitigated by requiring intent to use document to illegally manufacture.
Protect public interest	0 Does not address any risks to public safety specific to 3D printing.	- Limited benefits to public safety, which are likely outweighed by enforcement difficulties and possible proliferation of arms items made using more unsafe methods of manufacture.	+ Likely to have benefits for public safety by providing greater oversight of 3D printing and limiting this method of manufacture to a class of people who are subject to greater levels of scrutiny.	+ Benefits public interest by allowing more proactive law enforcement intervention and providing greater oversight of 3D printing.
Effective and efficient	0 Regulatory approach to 3D printing aligned with the regulation of other methods of manufacture in New Zealand.	-- Likely to face significant implementation and enforcement challenges given 3D printing has many legitimate (non-firearms) uses. Creates misalignment with how other methods of firearms manufacture are regulated in New Zealand.	0 Some implementation and enforcement difficulties are likely given 3D printing technology is used for a range of other legitimate (non-firearms) purposes. Creates misalignment with how other methods of firearms manufacture are regulated in New Zealand.	+ Creates efficiencies for law enforcement who are able to prosecute individuals who possess blueprints for illegal purposes but have not yet manufactured the arms item. Require to prove intent may make prosecution challenging in some circumstances.
Overall assessment	0 The status quo treats 3D printing the same as other methods of manufacture. This ensures a consistent approach, but may not address issues specifically associated with 3D printing.	-- On balance, this option is much worse than the status quo. It would risk stifling innovation and driving up costs, create misalignment within the Act, and likely face significant implementation and enforcement challenges.	- On balance, this option is marginally worse than the status quo. It would create misalignment within the Act and likely face some implementation and enforcement challenges.	+ On balance, this option is an improvement on the status quo (recommended). It would provide clarity, allow for more proactive law enforcement and bring New Zealand in line with comparable jurisdictions.

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

102. We consider that Option 4 provides the best balance between addressing the specific issues caused by 3D printing while ensuring that the regulatory controls on manufacture can be enduring and able to accommodate the emergence of future technologies.

103. We note that Police support implementing both Options 3 and 4.

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

104. Yes.

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

105. This option is one of several changes to offences and penalties that are considered in the Regulatory Impact Statement: Firearms Reform – Offences and Penalties (3 of 3). The costs associated with full package changes to offences and penalties are set out in that RIS.

106. The marginal implementation and operating costs of this option are likely to be minimal and cannot be itemised in detail, separate from the overall costs of the full package of changes to offences and penalties. The description of costs in the table below is, accordingly, high level.

Affected groups	Comment	Impact	Evidence Certainty.
Additional costs of the preferred option compared to taking no action			
Regulated groups	People who are prosecuted may incur legal fees. People convicted will face a sentence of up to 10 years in prison (loss of liberty, loss of job and income)	Medium	High
Police	Implementation costs including updating NIA, developing guidance, and developing and delivering training for frontline staff and prosecutors.	Low	High

Ministry of Justice	As a new category 3 offence, this will be eligible for jury trial. An increase in the number of category 3 court cases and jury trials will result in increased operating costs (increase judicial time, court registry and legal aid costs).	Low	High
Crown Law Office	An increase in the number of jury trials will increase operating costs (Crown prosecution costs), because jury trials are prosecuted by the Crown, not Police.	Low	High
Department of Corrections	Could result in more people imprisoned, on home detention or community detention, which would increase operating costs.	Low	Low
Total monetised costs		Low	High
Non-monetised costs		Low	High
Additional benefits of the preferred option compared to taking no action			
Regulated groups	Greater clarity for regulated groups.	Low	High
Regulators	Creates efficiencies for law enforcement who are able to prosecute individuals who possess blueprints but have not yet illegally manufactured the arms item.	Medium	High
General Public	Some public safety benefits expected by closing a regulatory loophole.	Low	Low
Total monetised benefits			
Non-monetised benefits		<i>Medium</i>	<i>Medium</i>

Section 3: Delivering an option

How will the proposal be implemented?

107. The Arms Act and Arms Regulations 1992 will need to be amended to implement the preferred option.
108. Police and the regulator will be responsible for implementing the preferred option. The regulator will communicate these changes to licence holders and update its operational guidance. Police will maintain responsibility for investigating and prosecuting the criminal offence under the Act.
109. The Ministry will work with Police and the regulator to operationalise the updated legislation.