

# Regulatory Impact Statement: Purchase of ammunition as an activating circumstance

<b>Decision sought</b>	Analysis prepared to support Cabinet decisions on the potential deferral of the purchase of ammunition as an activating circumstance in the Firearms Registry
<b>Agency responsible</b>	Ministry of Justice (the Ministry)
<b>Proposing Ministers</b>	Associate Minister of Justice (the Associate Minister)
<b>Date finalised</b>	2 April 2025

**Proposal:** Under section 41(1)(e) of the Arms Regulations 1992 (the Regulations), the purchase of ammunition is an activating circumstance that requires firearms licence holders to register their firearms and other arms items in the Firearms Registry from 24 June 2025. The Associate Minister seeks a deferral of this requirement to 1 December 2026.

## Summary: Problem definition and options

### What is the policy problem?

In 2023, the Regulations were amended to provide for the operation of a Firearms Registry (the Registry). The Regulations require all firearms to be registered by 31 August 2028. Registration is being implemented in a phased approach to spread the number of registrations across the five-year period, to allow the Firearms Safety Authority (FSA) time to process the registrations. Before 31 August 2028, licence holders can either register voluntarily, or be compelled to register within thirty days of an ‘activating circumstance’. Current activating circumstances include the purchase of a new firearm, application for a new licence or endorsement (there will be a peak in licence renewals in 2026), or being subject to compliance or enforcement action by the FSA.

From 24 June 2025, the Regulations state that the purchase of ammunition will be added as an activating circumstance. The Associate Minister’s preferred approach is to defer this date until 1 December 2026 to allow time for trust and confidence in the Registry to improve. This will be supported by the implementation of the recommendations from the Ministry of Justice Review of Firearms Registry review (the Review). In addition, a deferral would allow time for a definition of ammunition to be added to the Act, to increase clarity and certainty in the law.

### What is the policy objective?

The objective of the Associate Minister’s preferred approach is to allow more time for the FSA to build public trust and confidence in the Registry through:

- improvements to the Registry as recommended in the Ministry’s Firearms Registry

- Review; and
- consideration of including a definition of ammunition in the Arms Act 1983 (the Act) to increase clarity and certainty about what ammunition would be considered an activating circumstance.

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

The Ministry has considered the following options for deferring the purchase of ammunition as an activating circumstance.

- Option 1: deferring the purchase of ammunition as an activating circumstance from 24 June 2025 until 24 June 2028
- Option 2: deferring the purchase of ammunition as an activating circumstance from 24 June 2025 until 1 December 2026. (**Associate Minister's preferred option**).
- Option 3: pause all activating circumstances from 24 June 2025 to 1 December 2026.
- Option 4: maintaining the status quo, with purchase of ammunition remaining an activating circumstance as currently provided in the Regulations (**Agency's preferred option**).

Non-regulatory options have not been explored because the regulation is already in place. However, the FSA has offered to educate licence holders on what it considers ammunition when enforcing licensing, registration and clubs and ranges requirements.

### **What consultation has been undertaken?**

No formal consultation was carried out on this proposal. However, the Ministry considered feedback and advice from the Minister's Arms Advisory Group (MAAG) on option 1.

In analysing options 1, 2 and 3 for this RIS, the Ministry also used the stakeholder feedback it received to inform the Ministry's 2024 review of the Firearms Registry. The consultation period for this review provided licence holders with an opportunity to raise concerns about the Registry and its operations, including the purchase of ammunition as an activating circumstance. That consultation process did not pose any specific questions relating to activating circumstances.

No concerns were raised specifically about this activating circumstance, the definition of ammunition, or that it was encouraging firearms users to stockpile ammunition. However, some licence holders who did not support the Registry wanted to see all activating circumstances repealed and the Registry decommissioned.

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

No.

## Summary: Associate Minister's preferred option in the Cabinet paper

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### Costs (Core information)

#### Option 1: Defer the purchase of ammunition as an activating circumstance until 24 June 2028

This proposal poses the following costs:

- Deferral to 24 June 2028 has the same effect as repealing this regulation entirely because the Regulation requires that anyone who hasn't had an activating circumstance before 24 June 2028 must register their firearms by 31 August 2028.
- This effective repeal will limit the progressive and steady input of firearms data into the Registry to the current activating circumstances and voluntary registration only.
- Deferring the purchase of ammunition as an activating circumstance may:
  - impact the ability to make diversion more difficult. This could, in turn, impact on the safety of frontline police who may not know the number of firearms stored at a property;
  - increase the cost of investigations where firearm harm has occurred as Police will have to manually go through sales data to ascertain the ownership of a firearm.
  - demotivate those who may have otherwise registered their firearms voluntarily by sending a message that progressing implementation of the Registry is not a priority for the Government.
  - negate a key purpose for the \$1.4 million investment already made by Police on a platform to support the monitoring of ammunition sales.
  - cause reputational risk to the Government arising from victims of firearms harm questioning why a delay is necessary when the Registry is already operating and the Ministry's review shows it is already contributing to public safety
  - increase operational or resource costs for FSA, which will have to ensure the call centre is resourced to cope with any surges of registration in July/August 2028, which in turn may impact on the call centre user experience.

#### Option 2: Defer the purchase of ammunition as an activating circumstance until 1 December 2026 (Associate Minister's preferred option)

Option 2 presents similar risks to Option 1 as it will not encourage uptake prior to the 2026 licensing peak.

Additionally, the cost of a surge of registrations outlined in Option 1 may not be avoided because this option will coincide with a forecast surge in registrations in 2026 when many licence holders will have to apply for a new 10-year firearms licence (which remains an activating circumstance).<sup>1</sup>

#### Option 3: Pause all of the activating circumstances from 24 June 2025 to 1 December 2026

<sup>1</sup> There is a 10 yearly cyclical bell curve due to the introduction of 10 year licences in the 1990s. [Firearms +licensing progress update | Firearms Safety Authority New Zealand](#)

Option 3 presents similar risks to Option 2 as it will not encourage uptake prior to 2026. There will be the same risks that the expected surge of registrations after 1 December 2026 will be greater as fewer people register before the peak firearm licence applications. It will also mean that there may be more people who do not have an activating circumstance applied until 24 June 2028, because their firearms licence came up for renewal between 24 June 2025 and 1 December 2026.

#### **Option 4 - status quo (Agency's preferred option)**

There are no identifiable additional monetised or non-monetised costs to maintaining the status quo as the FSA has already invested in the required systems.

### **Benefits (Core information)**

#### **Option 1: Defer the purchase of ammunition as an activating circumstance until 24 June 2028**

This option would provide time for the FSA to build trust and confidence in the Registry before some licence holders need to register their firearms, provided that another activating circumstance does not occur. It also provides time for a definition of ammunition to be put into the Act.

#### **Option 2: Defer the purchase of ammunition as an activating circumstance until 1 December 2026 (Associate Minister's preferred option).**

Option 2 delays implementation of the activating circumstance but avoids the effective repeal of the regulation caused by Option 1. This option would provide time for the FSA to build trust and confidence in the Registry before some licence holders need to register their firearms, provided that another activating circumstance does not occur. It also provides time for a definition of ammunition to be put into the Act.

#### **Option 3: Pause all of the activating circumstances from 24 June 2025 to 1 December 2026.**

Option 3 effectively pauses all activating circumstances. This would provide more time for the FSA to build trust and confidence in the Registry through improved communication, before licence holders need to register their firearms. It also provides time for a definition of ammunition to be put into the Act to provide clarity and certainty in the legislation.

#### **Option 4 - status quo (Agency's preferred option)**

This option provides the best value for money. There are no additional costs to maintaining the status quo, as the FSA has already invested in the required systems.

FSA has confirmed it can provide more education on the definition of ammunition to assist licence holders. This can be done within current budget settings.

Maintaining the status quo will support the original policy intent of the regulation which is to support operational efficiency and maintain a positive user experience by spreading the number of registrations across the Registry's five-year implementation period.

A steady input of data under the status quo will also mean the Police is able to use the Registry more quickly as a database to support investigations and keep frontline Police safer by providing data on where legally possessed firearms are located. The Registry Review demonstrates that registration deters the diversion of firearms into the wrong hands, providing benefit to public safety.

### **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?**

Our analysis suggests that the benefits of the Associate Minister's preferred option is unlikely to outweigh the costs. The deferral of the purchase of ammunition as an activating circumstance is likely to lead to a higher cost to public safety through fewer registrations of firearms in the short term, which results in a delay in mitigating the risk of firearm diversion, and less data available for Police to use in the investigation of firearm-related crime.

The Associate Minister's proposal risks resourcing and operational pressures on the FSA by encouraging a surge of registrations in mid-2028. This would likely place significant pressure on the Registry call centre, which would impact the user experience, particularly for rural licence holders whose lack of internet connectivity will mean they rely on the call centre.

### **Implementation**

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

#### **Options 1 and 2 (defer ammunition as an activating circumstance)**

Following the amendment to the Regulations, the FSA would be responsible for communicating the change to all licence holders and make any operational changes required. Operationally, the FSA would also be responsible for the implementation of ammunition as an activating circumstance once it comes into force.

The deferral of this activating circumstance will delay the effectiveness of the Registry and risk poor service if there is a surge of registrations close to the new deadline.

#### **Option 3 (pause all of the activating circumstances from 24 June 2025 to 1 December 2026)**

This option would be similar to Option 2. However, the FSA will be responsible for communicating the pausing of the Registry implementation from 24 June 2025 and then recommencing the activating circumstances from 1 December 2026.

The deferral of these activating circumstances will delay the effectiveness of the Registry and risk substandard service if there is a surge of registrations close to the new deadline. This presents risk to frontline Police and the public by delaying the registration of firearms.

#### **Option 4 (status quo)**

The FSA will implement this option. An IT solution has been built and funded, and is set to launch in time for the current Regulations implementation date of 24 June 2025. A

communication plan has been prepared by the FSA to educate licence holders about the requirement of ammunition as an activating circumstance. The FSA has confirmed that the system will be completed before 24 June 2025. It relies on current systems that are in use and are continuously updated to improve the user experience.

### **Limitations and Constraints on Analysis**

The Ministry has used the evidence it has to hand, which includes responses to a questionnaire that was sent to key stakeholders as part of the Ministry's Registry Review. This review provided licence holders with an opportunity to raise any concerns about the purchase of ammunition as an activating circumstance, together with any other concern relating to the Registry. However, it did not seek feedback specifically on the area of activating circumstances. While no concerns were raised regarding this particular activating circumstance, there were some concerns about the impact that the existing activating circumstances are having on the number of firearms being purchased from dealers.

**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.**

**Responsible Manager(s)  
signature:**



**Kathy Brightwell  
General Manager- Civil and  
Constitutional  
2 April 2025**

### **Quality Assurance Statement**

**Reviewing Agency:** The Ministry of Justice    **QA rating:** Does not meet

**Panel Comment:**

A quality assurance panel with members from the Ministry of Justice has reviewed the *Regulatory Impact Statement (RIS), Purchase of ammunition as an activating circumstance*. The panel considers that it does not meet the Quality Assurance criteria. The RIS does not explain in a convincing way why there is a problem that the options will address, and only considers a limited range of options. It does not have a single set of policy objectives. The RIS is largely complete but could do more to identify constraints in the Ministerial direction and lack of consultation. There has been no consultation on this proposal, but the authors have incorporated perspectives from earlier consultation as far as is relevant.

## **Section 1: Diagnosing the policy problem**

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

## **A Firearms Registry was established to provide oversight on the possession of lawful firearms**

1. The Firearms Registry (the Registry) was launched by the Firearms Safety Authority (FSA), a business unit of Police, in June 2023 as part of the response to the 2019 terrorist attack on the Christchurch masjidain. It is provided for in Part 9 of the Arms Regulations 1992 (the Regulations).
2. The Registry, once fully established, will provide a centralised digital record of all lawful firearms and other arms items in New Zealand to support safe and responsible use<sup>2</sup>. It will also document when registered items change hands lawfully, are imported or exported, or are lost, stolen or destroyed.
3. The Registry will provide more oversight of the possession of firearms in New Zealand through a 'digital picture' of the number and locations of firearms around the country. As a result, the Registry is intended to act as a deterrent to the diversion of firearms from licensed to unlicensed hands.
4. Firearms can be used to cause harm to the public if they end up in unlicensed hands. In 2024, 5,071 people were charged with firearms related offences in New Zealand including 29 homicides and 215 acts intended to cause injury. Registering firearms through a series of activating circumstances will enhance public safety, making firearms harder to divert, while supporting the safe possession and use of firearms, for example, for food-gathering.
5. The Registry database can also be used by Police to ascertain the potential number of firearms present in a property prior to entering. However, the Police also uses other sources of information to determine the risk of firearms being used at a call-out, such as the reason for the call-out.

## **The Registry is being implemented in a phased approach**

6. The Regulations require that all firearms be registered by 31 August 2028. A phased approach to registration has been drafted into the Regulations. This was done to prevent operational and resource pressure on FSA trying to process large numbers of registrations in a short timeframe, and to ensure that the Registry user-experience is well supported, efficient and timely.
7. A phased approach also ensures a steady input of data, allowing Police to use the Registry and its data as early as possible for supporting both frontline safety (by identifying the presence of firearms before entering properties) and to support firearm harm investigations.
8. The Regulations spread registrations through a series of 'activating circumstances' across the five-year implementation period. An activating circumstance is an activity specified in the Regulations that compels the licence holder to register their firearms<sup>3</sup>.

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<sup>2</sup> Regulation 36 of the Regulations defines arms items to include any firearm, prohibited magazines, major firearm part, restricted weapons or pistol carbine conversion kit (but does not include specified firearms that an individual may possess without requiring a firearms licence).

<sup>3</sup> Regulation 41 (1).

Individuals can voluntarily register their firearms at any time but are obliged to do so within 30 days of an 'activating circumstance'.

9. From 24 June 2023 until 24 June 2025, activating circumstances included the following:
  - purchase of a new firearm;
  - application for a firearms licence and/or endorsement; or
  - a change of circumstance or receiving an improvement notice from the FSA or any other compliance activity.
10. From 24 June 2025, the following activating circumstances will be added:
  - firearms dealers to register their firearms stock and specified arms items in the Registry (the dealer stock obligations) (Regulation 41(4)); and
  - licence holders to register their firearms if they purchase ammunition (Regulation 41(1)(e)).
11. The reason for including the purchase of ammunition as an activating circumstance is because it signals to the FSA that the licence holder is frequently using their firearms rather than just storing the firearms in their secure storage<sup>4</sup>This will require licence holders who are frequently using their firearms to register them ahead of those who have firearms but are not using them. Ammunition is also purchased more regularly than firearms and so is more likely to encourage firearm registrations.
12. It is important to note that there is no requirement to register ammunition itself.

*Initially Police requested ammunition as an activating circumstance be deferred until 2028*

13. In December 2023, Police sought Ministerial direction from the Minister of Police and the Associate Minister of Justice on whether it could defer the ammunition and dealer obligations from 2025 to 2028. This was because the coalition agreement indicated a need for the Firearms Registry to be reviewed in 2024. Police noted that because procurement would need to begin in February 2024 for an IT platform to provide a technology solution to operationalise these regulations, it would be fiscally prudent to delay implementation of the activating circumstances until the results of the Review were released.
14. At this time the IT platform was going to be used for both for the registration of dealer stocks, and as a means for informing the FSA about the purchase of ammunition to be able to enforce the activating circumstance. The Associate Minister of Justice agreed to this deferral.

*However, a technical solution was found to monitor the purchase of ammunition that could also be used to notify FSA of an activating circumstance*

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<sup>4</sup> It is noted that not all firearms users will need to purchase ammunition, but the original policy intent used the purchase of ammunition as a proxy for those who may be using firearms more frequently and therefore at higher risk of being stolen, as they are not always in secure storage.

15. In February 2024, the FSA found a technical solution that could be used to monitor ammunition purchases both as an alert to suspicious buying, and to notify FSA of a purchase of ammunition. Police noted that this solution could be implemented in time for 24 June 2025 (Police Briefing BR2418 refers). Subsequent briefings therefore did not recommend deferral of ammunition as an activating circumstance. The proposed new solution involved expanding the existing dealer transaction form that has been used since June 2023 to record all firearms dealer transactions<sup>5</sup>. The expanded dealer transaction form would also record all ammunition transactions by both dealers and ammunition sellers. The FSA confirmed that its original request for the deferral of ammunition as an activating circumstance was no longer needed.

*No concerns about ammunition as an activating circumstance were raised in the Registry Review*

16. On 27 May 2024, Cabinet agreed to a Terms of Reference for the review of the Firearms Registry (CAB-24-MIN-0179 refers). The purpose of the review was to determine:
- the actual and potential costs of the Registry;
  - the extent to which the Registry is or will contribute to effectively improving public safety;
  - whether the requirements (including activating circumstances) are necessary, appropriate and streamlined; and
  - what changes, if any, are required to ensure the most effective running of the Registry.
17. The Ministry of Justice completed the Review between June and December 2024. The results of the Review are included in the Cabinet paper to which this RIS is attached. Information from the targeted engagement is discussed in more detail in para 33-37 of this RIS. However, no specific question was asked relating to activating circumstances. Of the 103 responses received, no one raised ammunition as an activating circumstance as a concern or a reason to avoid registration, and no one mentioned this regulation was encouraging people to stockpile ammunition. Some responses sought the removal of all activating circumstances, as they did not agree that rifles and shotguns should be registered.
18. Some submitters noted their distrust of the Registry, particularly in relation to the privacy or security settings of the Registry and the protection of personal information. The Review investigated this issue and found that the FSA had processes in place that meet government privacy standards. To address this lack of trust, the Review recommended the FSA and Police provide the Minister with a communications plan no later than 1 July 2025 to educate licence holders on how their information is protected, and how they can access and correct this information.

**What is the policy problem or opportunity?**

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<sup>5</sup> [Using the Dealer Transactions form | Firearms Safety Authority New Zealand](#)

19. The Associate Minister of Justice is seeking deferral of the purchase of ammunition as an activating circumstance from 24 June 2025 to 1 December 2026 to allow time to:
- implement improvements in the Registry as recommended in the Ministry's Firearms Registry Review, which will support trust and confidence in the Registry; and
  - consider including a definition of ammunition in the Arms Act to provide greater certainty and clarity in the law.

### **Who will be impacted by this option?**

20. The purpose of the Registry is to provide a complete record of all lawfully held arms items in New Zealand as a means of mitigating the risk of firearm diversion into criminal hands. Firearm diversion into the criminal hands risks safety to the public.
21. There are 230,738 firearms licence holders as of 31 December 2024 who will be required to register their firearms following an activating circumstance. Of the 59 percent of licence holders who have recorded their ethnicity in the Police database, 90 percent are New Zealand European and seven percent are Māori.
22. All four options will impact the public (including victims of firearms harm, licence holders and Police), if this deferral means that the Registry is not able to achieve its public safety objectives and reduce the risks of firearms moving from legal to illegal possession. Between 2007-2021, 1,076 people were killed by homicide and 17 percent of these homicides involved a firearm<sup>6</sup>. Based on a 2018 sample, Māori represented 30 percent of victims of firearms offences where there was an identified victim whose ethnicity was known. By 2020, this had increased to 37 percent.

### *Impact of options 1, 2 and 3 on licence holders*

23. The Associate Minister considers firearms licence holders will benefit in the following way:
- allowing time for the FSA and the Police to consider the operational and communications improvements outlined in the Registry Review around privacy and security settings and the purpose of the Registry;
  - greater confidence for firearms licence holders who are delaying the purchase of ammunition in order to avoid registration due to a lack of trust in the privacy and security of the Registry; and
  - increased clarity and certainty in the law, through the rewrite of the Arms Act including a definition of ammunition.
24. The Ministry considers these options could have a behavioural impact on licence holders who would otherwise voluntarily register their firearms without waiting for an activating circumstance. Options to defer the activating circumstances may send the message that early registration is not a priority. However, Police has advised that as, at 31 January 2025, 32 percent of licence holders have registered their firearms. This is more than the initial modelling, which projected 25 percent by June 2025. The Ministry notes that 30 percent of licence holders who have registered their firearms

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<sup>6</sup> [Homicide Victims Report 2022 and Historical NZ Murder Rate Report 1926-2022 | New Zealand Police](#)

have done so without an activating circumstance, so indicating they had some trust and confidence in the system.

25. These options also have the potential to impact the user experience. The surge in registrations closer to 2028, may be exacerbated by these options if there are not sufficient registrations before the peak in firearms licence applications in 2026. This would impact the ability of the FSA call centre to assist licence holders to register their firearms. However, it is unclear exactly what the impact of this will be given that licence holders may choose to register their firearms before an activating circumstance and it is difficult to predict when activating circumstances may occur.
26. The call centre provides licence holders with no or poor internet connectivity the ability to register their firearms over the phone. The Registry review found that currently the call centre wait time is three minutes. A surge in registrations may increase wait times.

#### *Impact of options 1, 2 and 3 on the public and victims of firearm harm*

27. The Registry Review found that the Registry, one year into implementation, is already showing early signs of improving public safety by making firearm diversion more difficult.
28. The roll out of activating circumstances supports the consistent entry of data over the implementation period. Delaying this entry through option 1, 2 and 3 will delay data input, which in turn will impact the depth of data Police will have to hand over the course of the implementation period for firearm harm related investigations. This has the potential to impact public safety.

#### *Impact of options 1, 2 and 3 on Police and FSA*

29. The intent of activating circumstances is to spread registration of the Registry's implementation period to remove resource pressures on FSA associated with surges in registrations. These options remove this phased approach, which in turn is likely to cause surges in registrations. This will put resource and operational pressure on FSA, particularly the call centre.
30. There is also a potential impact to frontline Police as firearms data input is slowed down due to the deferral. It will also limit the ability of Police to use the Registry as a tool for firearm harm investigation until the Registry is more established.

### **What objectives are sought in relation to the policy problem?**

31. The overarching objective sought for options 1, 2 and 3 is to provide more time for licence holders to register their firearms while further steps are implemented by FSA to increase licence holder trust and confidence in the Registry. These options would also allow time for legislation to be amended to provide greater certainty and clarity in the

law, and address any potential confusion about the definition of ammunition.

32. The overarching objectives sought for option 4 is the maintenance of the original policy intent behind for the Registry to ensure it is fit for purpose so that it can:
- support the safe possession and use of firearms and other weapons for legitimate purposes (e.g. sport, hunting, collecting and pest control); and
  - impose controls that protect individual and public safety from firearms related harm.

## **What consultation has been undertaken?**

### *Informal consultation with Ministers Arms Advisory Group (MAAG)*

33. The Ministry discussed deferral of the purchase of ammunition as an activating circumstance to 24 June 2028 with the MAAG (option 1). The MAAG reported divergent views on the proposal and recommended further consultation.

### *Targeted engagement on the Review of the Firearms Registry*

34. As part of the Review of the Firearms Registry, the Ministry considered information received as part of a stakeholder engagement period from 6 August to 28 August 2024. During the engagement period, the Ministry received 103 responses. Of these 35 were from the firearms community (including 18 from dealers). There were 68 submissions from the non-firearms owning community including 55 individual responses from the Muslim community. This engagement included asking questions about whether any of the regulations were considered unnecessary for public safety, but did not specifically ask for views on activating circumstances.
35. The Review did not receive any concerns specific to the purchase of ammunition as an activating circumstance. However, one person raised concerns that the activating circumstances generally were having an impact on the number of new firearm purchases as people held off registering for as long as possible. Similarly, there were concerns that activating circumstances generally were having negative economic impact on dealers and their ability to sell firearms (currently purchasing a firearm is an activating circumstance which requires registration).
36. Three people opposed the registration of ammunition (which is not proposed) and one organisation requested that the ammunition sales be recorded. None of the responses suggested that this activating circumstance was encouraging the stock piling of ammunition or raised any concerns about the definition of ammunition as causing confusion.
37. Submitters raised concerns about the security of information in the Registry. The Review identified some communication gaps that could be addressed to better support registration uptake. To assist with this, the Review recommends the FSA provide the Associate Minister of Justice and the Minister of Police with a refreshed communications plan no later than 1 July 2025 to cover the following:

- a strengthened FSA Registry purpose statement drafted in consultation with the MAAG and Ministry of Justice so that the firearms community have a clearer understanding of the Registry's intent;
- targeted information for all clubs and ranges about the correct process for registering club firearms;
- a communications plan to better support the registration of Māori firearms licence holders; and
- communications on the privacy and security of Registry information, and communications to users about their rights under the Privacy Act to access and correct personal information.

## **Section 2: Assessing options to address the policy problem**

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### **What criteria will be used to compare options to the status quo?**

38. The Ministry of Justice has used the following criteria for assessing the options:

- **Safety** – the potential for the option to contribute to protecting the public and frontline Police from firearms-related harm.
- **Value for money** – the extent to which the approach represents the effective use of public money;
- **User friendly** – the potential for the option to enhance or diminish end-user experiences with the regulator (FSA);
- **Flexible**- The ability to give the licence holder confidence and choice on when they register their firearms over the five-year implementation period, provided no other activating circumstance occurs.

### **What scope will options be considered within?**

39. The Associate Minister has asked for this targeted amendment alone prior to the Arms Act rewrite, given that the changes will need to occur prior to 24 June 2025. There are no non-regulatory options available as the regulation is already in place.

40. The Ministry has consulted Police (including the FSA) and the Office of the Privacy Commissioner on options and incorporated their feedback to ensure that implementation risks are considered.

### **What options are being considered?**

The following options have been considered in the analysis:

### **Option One – deferring the purchase of ammunition as an activating circumstance until 24 June 2028**

41. Under this option, the purchase of ammunition as an activating circumstance would be deferred until 24 June 2028. This means that licence holders would not be required to register their firearms if they purchased ammunition until 24 June 2028 (unless another activating circumstance applied).
42. This approach gives time to build trust in the Registry via implementation of communications and operational improvements recommended in the Registry review, and to include a new definition of ammunition into the legislative process for the rewrite of the Arms Act.

### **Option Two – deferring the purchase of ammunition as an activating circumstance until 1 December 2026 (Associate Minister’s preferred option)**

43. Under this option, the purchase of ammunition as an activating circumstance would be deferred until 1 December 2026. This means that licence holders who purchase ammunition would not be required to register their firearms until 1 December 2026.
44. This option would provide 18 months for operational and communications improvements to build trust in the Registry, and a new definition of ammunition to be developed as part of the Arms Act rewrite. However, it would only benefit those licence holders who do not have another activating circumstance.

### **Option Three: Pause all of the activating circumstances from 24 June 2025 to 1 December 2026.**

45. Under this option, all of the activating circumstances would be paused from 24 June 2025 to 1 December 2026. This would provide 18 months for operational and communications improvements to build trust in the Registry, and a new definition of ammunition to be developed as part of the Arms Act rewrite.

### **Option Four – Maintain the Status Quo (Agency’s preferred option)**

46. Under this option, from 24 June 2025, firearms licence holders who purchase ammunition will continue to need to register all of their arms items within 30 days of the ammunition purchase. This does not include the ammunition itself.
47. The intention of this activating circumstance is to encourage those who actively use their firearms to register these firearms as early as possible, thereby avoiding a peak of registrations in 2027/2028. The purchase of ammunition was identified as an activating circumstance because frequent users of firearms are more likely to purchase ammunition rather than another firearm.

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

- ++ 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

	<b>Option one – deferring the purchase of ammunition as an activating circumstance until 24 June 2028</b>	<b>Option two - deferring the purchase of ammunition as an activating circumstance until 1 December 2026</b>	<b>Option Three- pausing activating circumstances from 24 June 2025 to 1 December 2026</b>	<b>Option Four – [Status Quo / Counterfactual]</b>
<b>Safety</b>	<p style="text-align: center;">-</p> <p>Delaying this activating circumstance has the potential to delay a steady progression of the registration of firearms and other arms items. The purchase of ammunition was identified as an activating circumstance that would result in an increase in registrations due to the higher likelihood of firearms users purchasing ammunition rather than a new firearm.</p> <p>This delay in registration will lead to a delay in firearms data being entered into the Registry. This in turn delays the ongoing implementation of the Registry, lessening the amount of data available for Police to use when assessing whether a firearm is present at a location before entering. This has the potential to impact the safety of front-line Police. The delay in data will also</p>	<p style="text-align: center;">-</p> <p>Delaying this activating by 12 months still delays the steady progression of registration of firearms, potentially causing the risks to Police and public safety outlined for Option 1.</p>	<p style="text-align: center;">--</p> <p>Pausing all activating circumstances would impact the planned staged progression of registration, potentially increasing the risk to Police and public safety outlined in Option 1.</p>	0

	impact the Police's ability to use this data for the investigation of firearm harm related crime until just before 31 August 2028.			
<b>Value for money</b>	<p style="text-align: center;">-</p> <p>The investment to date on monitoring ammunition sales will not be effectively used. It would still be available for identifying unusual sales such as purchasing ammunition from multiple dealers. However, it would no longer be used to increase the uptake of the firearms registrations through the purchase of ammunition being an activating circumstance.</p> <p>Given that there are no additional costs to implement the purchase of ammunition as an activating circumstance over and above what has already been spent by Police, this option is not considered the best value for money</p>	<p style="text-align: center;">-</p> <p>This option would be similar to Option 1. However, the investment to date, will be able to increase firearm registrations from 1 December 2026 (18 months after the status quo). However, it will still reduce the number of firearm registrations that may occur prior to the firearms licensing peak and therefore would not effectively use the existing system.</p>	<p style="text-align: center;">--</p> <p>This option would be similar to Option 1. However, the investment to date would not be utilised (including systems that are already in operation), to be able to increase firearm registrations from 1 December 2026 (18 months after the status quo). However, it will still reduce the number of firearm registrations that may occur prior to the firearms licensing peak and therefore would not effectively use the existing system.</p>	0
<b>User friendly</b>	<p style="text-align: center;">-</p> <p>This delay to the purchase of ammunition as an activating circumstance will mean that there may be less registrations prior to the peak in firearm licence applications in 2026. This would mean that the number of registrations may not be effectively spread out and this could result in</p>	<p style="text-align: center;">-</p> <p>This option, while deferring ammunition as an activating circumstance to 1 December 2026 would lessen the risk of licence holders waiting until 2028. It will not encourage registrations ahead of the firearm licensing peak in 2026.</p>	<p style="text-align: center;">--</p> <p>This option would result in a greater peak in firearms registrations in the last 18 months of the Registry's implementation. This is because it will not encourage registrations ahead of the firearm licensing peak in 2026/2027.</p>	0

	<p>additional resourcing pressures for the FSA.</p> <p>This surge would impact FSA administration of registrations, increasing wait times in the call centre and negatively impacting the user experience for firearms holders.</p> <p>This could impact how user friendly and efficient the system is for licence holders as register their firearms. For example, call centre wait times could increase.</p> <p>This option may also be confusing to licence holders who don't understand why this activating circumstance has been deferred and not others.</p>	<p>Therefore, this option will be similar to Option 1).</p>		
<b>Flexible</b>	<p style="text-align: center;">+</p> <p>This option would provide flexibility for those who want to purchase ammunition and delay registering until 24 June 2028 <b>and have no other activating circumstance.</b></p> <p>The Registry Review recommended the FSA implement a communications plan (within current budget) to address the lack of trust on privacy and security settings, as well as the overall purpose of the Registry.</p> <p>This option would provide more time for FSA to build the trust those who do not trust the privacy and security settings of the Registry. However, this flexibility is</p>	<p style="text-align: center;">+</p> <p>This option would provide flexibility for those who want to purchase ammunition and delay registering until 1 December 2026 <b>and have no other activating circumstance.</b></p> <p>This option mirrors the points made for Option 1 under this criterion with the following addition:</p> <ul style="list-style-type: none"> <li>This option allows for a faster uptake of registrations compared to Option 1. However, as the peak in firearms licence applications is expected to</li> </ul>	<p style="text-align: center;">++</p> <p>This option would allow those who do not have trust and confidence in the Registry to wait to register their arms items until the FSA has had a chance to improve their trust and confidence in the Registry through operational changes and improved communication.</p> <p>This option mirrors the points made for Option 1 under this criterion with the following addition:</p> <ul style="list-style-type: none"> <li>This option enables more time to be provided before needing to register for all licence holders who do not have trust and confidence in the privacy and security settings of the Registry.</li> <li>This option will mean a greater number</li> </ul>	0

<p>limited as other activating circumstances (such as a new endorsement on a licence or change in circumstance) are still in operation.</p> <p>This option may ease the perceived need for stockpiling ammunition. However, the Ministry was unable to corroborate evidence of any change in behaviour in ammunition purchasing directly to avoid registration. Our research suggests that the ability to stockpile will be limited by the cost of ammunition and current supply constraints as a result of current world events.</p> <p>Even if there was evidence of stockpiling due to this activating circumstance, this option is unlikely to have much impact as any stockpiling is likely to have already occurred given the proximity of the Regulation going live (24 June 2025).</p> <p>This option provides the flexibility for a definition of ammunition to be included in the Arms Act 1983 rewrite.</p> <p>The Ministry notes that a submission process has already been undertaken as part of the Registry review, where no one specifically raised any confusion around the definition of ammunition, or concern about ammunition as an activating circumstance.</p>	<p>occur in 2026 (due to the introduction of 10-year licences in the 1990s), there will still be a heavily reliance on the firearms licence activating circumstance rather than registrations occurring ahead of the firearms licensing peak.</p> <ul style="list-style-type: none"> <li>• Delaying some registrations by not having the purchase of ammunition as an activating circumstance will only serve to put pressure on FSA services. For example, this will impact the user experience of this call centre service (wait times will increase).</li> <li>• This option provides time for further communication and education to occur on the Registry and develop a clear definition of ammunition in the Arms Act. However, some users who oppose the Registry may want to see further activating circumstances also deferred or repealed so that they don't have to</li> </ul>	<p>of licence holders will not have an activating circumstance prior to 24 June 2028, particularly if their firearms licence is due for renewal between 24 June 2025 and 1 December 2026.</p>	
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	<p>The deferral would run the risk of demotivating those who may have otherwise registered their firearms as it sends the message that the Registry is not seeking registrations until 2028, and that early and steady registration is not a government priority.</p>	<p>register their arms items.</p> <ul style="list-style-type: none"> <li>This option provides more time for people to stockpile ammunition before the activating circumstance comes into force.</li> </ul>		
<p><b>Overall assessment</b></p>	<p style="text-align: center;">-</p> <p>Overall, this option may slow the uptake of registrations in the short and medium term and create a surge of registrations in 2028. This will result in a poorer user experience from stretched FSA services to cope with the surge. The slowing down of registrations would mean Police and FSA would not have a steadily growing database to use for operational and investigative purposes until 2028. This has the potential to impact the safety of the public and frontline Police.</p> <p>This option may also demotivate some licence holders from registering their firearms as it sends a signal the government is not placing a priority on implementing the Registry.</p> <p>This option may provide time for FSA and Police to implement a communications plan to build trust in the Registry.</p>	<p style="text-align: center;">-</p> <p>Overall, this option would still slow the uptake of registrations by impacting the current momentum. However, it does provide more time for education about the Registry and a definition of ammunition to be created to provide more clarity in the Arms Act.</p>	<p style="text-align: center;">--</p> <p>Overall, this option provides the most flexibility for all licence holders, particularly those who do not have trust and confidence in the Registry. However, under this option, there is a greater risk of a peak in firearms registrations that undermines the quality of service that the FSA can provide (particularly to rural communities who often need to register their arms items over the phone). It also expected to slow the number of registrations the most which could have public safety implications if Police do not know how many arms items are in the community or at a particular address.</p>	<p style="text-align: center;">0</p>

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

48. The Ministry and Police prefer Option 4 - status quo, where the purchase of ammunition is an activating circumstance from 24 June 2025. This requirement ensures that the staged implementation of arms items owned by firearm licence holders continues.
49. Delaying the additional activating circumstances would reduce the amount of information that is entered into the Registry in the short term. This means that the Registry will be less useful over that period if there is less uptake. The number of registrations would depend on the rate of voluntary uptake and whether other activating circumstances apply in individual cases.
50. Police's preference is not to delay the implementation date of this aspect of the Registry. There are still 70 per cent of firearms licence holders that need to register their firearms over the next four years. Deferring the purchase of ammunition as an activating circumstance will slow the number registrations down. This could have an unintended consequence by placing more reliance on the firearms licence application as an activating circumstance or more licence holders waiting until 2027/2028, which would have resourcing implications for the FSA and the service that they can provide users. By keeping the status quo, this reduces the risk of a degraded service by overwhelming the call centre.
51. Police also note that the \$1.4 million financial cost associated with the oversight of the ammunition transactions will have been completed by April 2025. There are no additional costs for implementing the ammunition obligations in 2025 making the status quo cost-neutral.

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

52. No, the Associate Minister's preferred option is to defer the purchase of ammunition as an activating circumstance until 1 December 2026.

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

Affected groups	Comment	Impact	Evidence Certainty
<b>Additional costs of the preferred option compared to taking no action</b>			
Firearm licence holders	Could result in a degraded licence holder service if more licence holders register their arms items in 2027/28 and the call centre wait time increases.	\$ nil Medium	Low -The impact on the service that the FSA can provide to licence holders depends on the number of people who register before 2027.
Regulator (FSA)	Could put more pressure on FSA resources, if more licence holders register their arms items in 2027/28.	\$ nil Medium	Low - The impact on the service that the FSA can provide to licence holders depends on the number of people who register before 2027.
General public	Some stakeholders may perceive the delay in registering firearms as a threat to public safety.	\$ nil Low	Low - it is difficult to determine perceptions without consultation.
<b>Total monetised costs</b>			
<b>Non-monetised costs</b>		Low	
<b>Additional benefits of the preferred option compared to taking no action</b>			
Firearms licence holders	Some firearm licence holders may perceive a delay in needing to register their firearms as a benefit if they are wanting to wait longer before registering their firearms. However, 30 percent of registered firearms have been registered without an activating circumstance. Therefore, it is unclear what percentage of licence holders are avoiding activating circumstances.	Low	Low - it is difficult to predict any change in behaviour as a result of this change.
<b>Total monetised benefits</b>		Unknown	
<b>Non-monetised benefits</b>		Low	

## Section 3: Delivering an option

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### **How will the proposal be implemented?**

53. If Cabinet agrees to defer, Regulation 41 (1) (e) of the Arms Regulations will need to be amended before 24 June 2025. This could occur as part of the Arms (Shooting Clubs and Ranges) Amendment Regulations 2025 that are expected to go to the Cabinet Legislation Committee in May.
54. The FSA will communicate with licence holders through their partnership team that the purchase of ammunition as an activating circumstance has been deferred until 1 December 2026. The FSA will need update their internal processes so that the purchase of ammunition is not enforced as an activating circumstance from 24 June 2025.

### **How will the proposal be monitored, evaluated, and reviewed?**

55. The Ministry and FSA will continue to monitor the implementation of the Registry as part of their regulatory stewardship responsibilities. Following a recommendation from the Registry Review, the Ministry of Justice will be drafting a monitoring and evaluation plan is being developed that will include reviewing the Registry in 2028.