

BASC guidance on responding to a Northern Ireland Department of Justice consultation on proposed amendments to firearms licensing fees and the "Banded System".

28 April 2026

Introduction

The Northern Ireland Department of Justice (DoJ) is [consulting on proposals to increase all firearms licensing fees by 153 per cent and to make changes to the banded system.](#)

BASC is urging all certificate holders in Northern Ireland to respond to the consultation, which closes at 5pm on **29 May**.

This document contains background information and guidance on how to respond.

BASC's position

BASC does not support the DoJ's proposal to move to full cost recovery and is strongly opposed to any increase in fees without a full, independent, transparent review of the necessary processes within firearms licensing.

That review must involve the organisations on the Northern Ireland Firearms Representative Group (NIFRG), which is chaired by BASC. Without clarity on the work carried out by Police Service of Northern Ireland Firearms and Explosives Branch (PSNI FEB) staff, it is impossible to accurately determine the true cost of the various transactions.

BASC supports the addition of more calibers to the banded system, which is based on amendments we submitted to the Justice Committee in 2020. However, BASC is opposed to proposals move certain calibers between bands.

BASC guidance

This guidance can be used to respond to the consultation using either the DOJ's online consultation response form or the DoJ's downloadable response questionnaire.

Visit the following website for the consultation documents and response forms:

<https://www.justice-ni.gov.uk/consultations/consultation-proposed-amendments-firearms-licensing-fees-and-banded-system>

Questions 1 to 6

These are questions about you – answer as you see fit.

Question 7

The Department proposes to move to full cost recovery for firearms licensing in line with the 2018 Northern Ireland Audit Office recommendation and to comply with the Department of Finance's document Managing Public Money Northern Ireland. Do you agree with the Department's proposal to move towards full cost recovery for firearms licensing fees?

Please tick the 'No' box.

Explain your answer using some or all of the following points.

- I do not support the DoJ proposal to move to full cost recovery.
- I am strongly opposed to any increase in fees without a full, independent, transparent review of the necessary processes within firearms licensing. That review must involve the organisations on the Northern Ireland Firearms Representative Group (NIFRG). Without clarity on the work carried out by FEB staff, it is impossible to accurately determine the true cost of the various transactions.
- The consultation document focuses heavily on the £2M (approx.) shortfall, however it fails to provide any detail in relation to how that figure was achieved.
- The consultation refers to a PSNI FEB data collection exercise that took place in June 2025 however that data has not been included in the consultation, hence it is impossible to understand the true costs of the various transactions listed in Schedule 6 (the fees schedule)
- No assurances in relation to any improvement in service have been provided.
- There is a serious lack of accountability within PSNI FEB, and this has been the case for many years. A first step in achieving greater accountability would be the implementation of a Service Charter which is permitted under Managing Public Money in Northern Ireland (MPMNI). Additionally, there must be a mechanism for holding FEB to account when they fail to meet the agreed processing timescales set out in the Service Charter.
- Given the vital role that FEB plays in helping to ensure public safety, any income derived from firearms licensing fees should, in its entirety, be ringfenced for FEB. Additionally, the Chief Constable should ensure that FEB is always staffed to full capacity. The implementation of both measures would help ensure that FEB perform to the standards set out in MPMNI.
- The DoJ appeals process is broken, as those who appeal face protracted delays of up to and beyond two years. The broken appeals system means that a person aggrieved by a decision of the Chief Constable has no recourse. Once again this demonstrates a lack of accountability, contrary to the standards set out in MPMNI. The DoJ appeals process needs to be fixed.

Question 8

The Department proposes to add the 9mm/.357 air rifle to Band 2 of Schedule 1A. Do you agree with the Department's proposal in respect of the addition to Band 2?

Please tick the "No" box.

- I feel that air rifles should remain within what has been known as the air rifle band (Band 1).
- Including an air rifle in Band 2 undermines the integrity and credibility of the Banded System which has worked well.
- Banded system transactions significantly reduce the administrative burden on FEB and with that I feel strongly that the list of calibres should be significantly expanded compared to what currently exists. If PSNI and/or DoJ have any genuine public safety concerns in relation to any calibre within specific bands, these concerns need to be shared and discussed with key stakeholders.

Question 9

The Department proposes to add the .17 Winchester Super Magnum to Band 3 of Schedule 1A. Do you agree with the Department's proposal in respect of the addition?

Please tick the "No" box.

Explain your answer using some or all of the following points.

- .17 Winchester Super Magnum (.17WSM) should not be included in band 3 of Schedule 1A as this is a rimfire calibre which belongs in Band 2. Adding .17WSM to Band 3 undermines the integrity and credibility of the banded system.
- .17WSM should be added to Schedule 1A, but it should be added to Band 2, to sit alongside the other rimfire calibres with which it has more in common than those in Band 3.
- DoJ and PSNI are aware that banded system transactions significantly reduce the administrative burden on FEB and with that I feel strongly that the list of calibres should be significantly expanded compared to what currently exists. If PSNI and/or DoJ have any genuine public safety concerns in relation to any calibre within specific bands, these concerns need to be shared and discussed with key stakeholders.

Question 10

The Department proposes to add the 6.5 Creedmoor; 6.5x47 Lapua; .260 Remington and 7x57 Mauser to Band 4 of Schedule 1A. Do you agree with the Department's proposal in respect of the additions to Band 4?

Please tick the "Yes" box.

Explain your answer using some or all of the following points.

- I agree with these calibres being added to Band 4 of Schedule 1A.
- The DoJ and PSNI are aware that banded system transactions significantly reduce the administrative burden on FEB and with that, I feel strongly that the list of calibres should be significantly expanded compared to what currently exists.
- There are other calibres which could have been added, being similar in muzzle velocity and muzzle energy to those already included in this band.
- If PSNI and/or DoJ have any genuine public safety concerns in relation to any calibre within specific bands, these concerns need to be shared and discussed with key stakeholders.

Question 11

A draft Rural Needs Impact Assessment and Section 75 Equality Screening Form is available on our website along with Regulatory Impact Assessments for each proposal. We welcome any views or comments you may have on these documents or any other additional comments you wish to make regarding this consultation. Please provide any additional comments below.

Please add the following comments.

- I feel strongly that firearms dealer holdings under the Ministerial Directive are increased, as the current limits on holdings restrict trade.
- There should have been engagement with stakeholders prior to the consultation being published.
- BASC represent some of those who stand to be most heavily affected by these changes – i.e. rural residents and those who use firearms in connection with their livelihoods. The RNIA fails to recognise the economic and environmental contribution shooting makes to the rural community. The proposed increase will mean fewer individuals available to carry out pest and predator control which ultimately assists in maintaining a balance in the countryside.