

Written evidence submitted by Mr M D Jenvey (OWB82)

(Only relating to clauses within the Bill relevant to proposed restrictions on sporting firearms)

SUBMISSION TO PUBLIC COMMITTEE – OFFENSIVE WEAPONS BILL

As a private individual & very experienced target rifle shooter, I wish to submit:

- The clauses linked to firearms are punitive.
- There is no statistical substance or historic / current risk assessment that shows any viable reason(s) for their inclusion.
- The Home Office has been obstructive & not forthcoming.
- No proof of higher risk to the public has been shown.
- Inputs to the initial Consultation have been ignored.
- No National Shooting Authorities were approached for the Consultation.
- The Bill goes against previous Home Affairs Select Committee Input.
- Bias / misunderstanding has been shown in Parliament - legislation cannot be so enacted.
- There is possible ECHR focus.
- The current conditions for award / retention of Firearms Certificate are more than sufficient.
- Banning such firearms is pointless – (1997 handgun ban).

SHOOTING “CV”

- Began shooting with Air Training Corps (ATC) in 1971; achieved marksman badge on first shoot. Was within top 100 shots in ATC for 3 consecutive years.
- Royal Air Force service 1976-1995 – Officer In Charge of Shooting at numerous bases, & Strike Command Shooting Secretary. Represented RAF in Target Shooting.
- Regional Instructor with National Rifle Association; national assessor for range safety instruction.
- Current Range Officer for ATC.
- Cambridgeshire Full-bore Shooting Secretary.
- Cambridgeshire County District Superintendent English Twenty.
- Shooting target rifles from 1971 – 2018 (& ongoing), including representing England.

FREEDOM OF INFORMATION QUESTIONS

The Offensive & Dangerous Weapons Consultation (since closed) opened to the public 14 Oct 2017. I submitted a response to the Consultation & also submitted questions under Freedom of Information (Fol) as listed (cases 45786 & 45792). It was necessary to remind the Home Office several times that their responses were

delayed. These reminders included multiple inputs from my MP (Heidi Allen) & also the Information Commissioner's Office (ICO) (case number FS50714409); I can provide evidence of the message chains if required. **Please see ANNEX A.**

HOME OFFICE RESPONSE dated 24 Jan 2018 (please see ANNEX B)

This response was not satisfactory in numerous ways; no statistics are available to show associated crime / risk to public for the rifles in question. In particular, the denial of information relating to Mark Groothuis is considered to be very relevant & should be considered as a point of great interest for the Committee to research further. Also worthy of note, the HO respondent, Graham Widdlecombe, is also mentioned in my request for Internal Review & he should also be considered as "person of interest."

Therefore I requested an Internal Review on 23 Mar 2018.

Another person, who also submitted FOI questions & a submission to the Committee, quoted this to me. The response (FOI 45787) from the Home Office:

"The Home Office does not hold information on the calibre of firearm used in offences involving firearms or whether the offence was committed by a licensed firearm holder."

This adds indisputable evidence that such firearms / crime statistics cannot be provided "in toto" let alone .50 / MARS rifles – yet a ban is proposed.

REQUEST FOR INTERNAL REVIEW – please see ANNEX C

The most recent reminder from the ICO was sent to the Home Office on 29 Jun 2018; as at 3 Jul, there was no response from the Home Office, this is nearly 4 months from the original request. My MP's office had input from the Home Office; in an email sent to me on 12 Jul:

"We are still in the process of carrying out the Internal Review (IR) , which looks independently and thoroughly into the handling of FOI request 45786.

I consider the original FOI request, and subsequent IR to be complex, and I cannot confirm when a response will be issued.

However, I can assure you that the case is being dealt with urgently."

This has to be considered as extremely strange as expected answers / range of statistics to my FOI questions should have been considered as just part of all detailed input into the background Home Office assessment prior to the Bill being published. Yet they are viewed as complex with no timescale available for any response – with the Bill in progress. The Committee should find this exceptionally worrying.

INCORRECT PARLIAMENTARY ANSWER ¹

Quote (as answered by Nick Hurd MP - Minister of State at the Home Office):

"A small number of shooting clubs are approved to use firearms which use armour-piercing ammunition."

To the best of my knowledge, that was impossible; armour-piercing (AP) ammunition is not legal for general possession under Section 5 of the Firearms Act 1968.

The answer was subsequently corrected (I made input via my MP) but it was a huge coincidence that this was an active issue whilst the Consultation was still live. Who was briefing wrong information that gave such a dangerously incorrect / biased slant?

COMMONS LIBRARY BRIEFING PAPER – published JUN 2018 ²

The Commons Library Briefing Paper figures confirm that handguns are the main firearm (& are a repeat of the information / quote in one of my original Fol questions):

"Since 2008/09, handguns have remained the most commonly used non-air firearm type, accounting for 42% of non-air firearm offences in 2016/17.

The use of Imitation firearms has increased the most among non-air firearm offences, from 18% of all non-air firearm offences in 2008/09 to 28% in 2015/16, before falling to 26% in 2016/17.

Rifles have remained the least common non-air firearms type accounting for around 1% of all offences over the period."

So, handguns, currently banned for the short-barrelled firearms types favoured by criminals (black powder pistols aren't going to be a weapon of choice) & imitation firearms are the primary types (68%) used in crime. Long-barrelled firearms are not the weapon of choice, based on their being cumbersome to hide / use / acquire ammunition. Consequently, this proposed legislation is looking at completely the wrong areas.

POSSIBLE EUROPEAN CONVENTION OF HUMAN RIGHTS CONFLICT – A1P1 ³

¹ <http://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2017-10-25/109587/>

² <http://researchbriefings.files.parliament.uk/.../CBP-7654...>

This area has already been raised in Parliament & needs to be considered with respect to freedom of possessions:

Quote:

"For example, a licence would be protected by A1P1 provided the licence holder had a reasonable and legitimate expectation as to the lasting nature of the licence."

DANGEROUS & OFFENSIVE WEAPONS CONSULTATION RESPONSE ⁴

Please see paragraphs 44 onwards.

Despite the significant number of inputs to the Consultation (firearms questions), someone **(Who? Groothuis? Widdlecombe?)** clearly decided that these were not relevant or appropriate. If anything, it could be considered likely that a pre-conceived course of action (inclusion of clauses in Offensive Weapons Bills) was already set in place. It is suggested that the Committee needs to dig deep here.

To highlight a section from the Home Office response to me 24 Jan:

"No decisions have yet been made in relation to these rifles. This will be taken following the consultation and in the light of the responses received, set against the Government's assessment of the risk and threat at that time."

This seems to be very contradictory taking into account the responses to the Consultation & the subsequent inclusion of the firearms-related clauses in the Bill.

INCORRECT / MISLEADING COMMENTS BY PUS VICTORIA ATKINS ⁵

During the Second Reading of the Offensive Weapons Bill, it was stated by Victoria Atkins MP that gun crime would reduce as a result of the proposed changes in the Bill. This is impossible as the types of firearms specified (0.5" rifles & MARS actions rifles) have never been used in crime; the comment was at best a serious error, misleading the House, or at worse, a deliberate effort to move the Bill in the wrong direction. Adding up bias from this & previous Government inputs, it is not

³ <https://publications.parliament.uk/.../ldeucom/82/8210.htm>

⁴

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/717673/SUMMARY_OF_CONSULTATION_RESPONSES.pdf

⁵ <https://www.facebook.com/VictoriaAtkinsOfficial/videos/1703062483074575/>

unreasonable to assume that the pathway was set in stone some time ago. This is not how democracy / legislation should work.

FIREARMS CERTIFICATE HOLDERS ⁶

As at 31 Mar 2018, there were some 157,581 Firearms Certificate (FAC) holders, with 577,547 firearms held under such FACs:

Of the 577,547 firearms (covered by firearm certificates) as at 31 March 2018, the majority (58%; 335,162) were rifles, followed by sound moderators at 30% (175,687).

The requirements to hold an FAC make this group of the public one of the most stringently assessed / monitored sports group in the UK; for example, from Apr 2016, information sharing processes were included to ensure medical fitness to hold an FAC. Moreover, it is not a “given” that a FAC will be issued or retained:

9,696 new applications for firearms, of which 98% were granted and 2% were refused.

345 firearms certificates revoked; a decrease of 4% (-13) compared with the previous year.

The Home Office cannot provide statistical evidence to show correlation of FAC holders / legally held firearms used in crime. Their case is non-existent.

As a reminder from (partial quote] my FoI question of 15 Oct 2018:

“As a consequence, it was agreed that any risk of legally held firearms being used for criminal purposes was so low that”

Where are the latest risk assessments that have changed the emphasis so drastically? Why are there no corresponding clauses in the Bill to increase the penalties for illegal possession & / or use of handguns / imitation firearms? This smacks of punitive action against FAC holders with no legitimate basis / grounds to warrant such action.

HOME AFFAIRS SELECT COMMITTEE REPORT ⁷

⁶

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721286/firearm-shotgun-certificates-england-and-wales-march-2018.pdf

⁷ <https://publications.parliament.uk/pa/cm199900/cmselect/cmhaff/95/9502.htm>

The current clauses ignore many points raised in the report. Indeed, there are actions (provide details of weapons seized over one year) that do not seem to have been carried out. The Home Office is attempting to vary the conditions / requirements for firearm ownership in a way that was not intended. Moreover, there has been zero input from the Home Office to show additional threat to the public.

LETTER FROM HEIDI ALLEN MP TO THE HOME SECRETARY – please see ANNEX D

My MP, Heidi Allen wrote to the Home Secretary on 11 Jul, listing numerous areas of concern.

CONCLUSION

From 15 Oct 2017, I have attempted to fact find / ascertain behind the scene circumstances relating to the firearms-related aspects for the initial Consultation, & latterly, their inclusion in the Offensive Weapons Bill. I cannot claim any associated success despite repeated efforts / reminders via my MP & the ICO.

The Home Office responses have been exceptionally tardy in a way that has to be considered as being obstructive. I very much hope that the Public Bill Committee can see that this is a huge issue – there cannot be a minimal (or even zero) production of evidence to members of the public, but miraculous (contradictory) submissions within a Bill / associated discussion. Moreover, there are disturbing signs that despite a complete lack of any statistical evidence or suitable risk assessment, there is a push to railroad through the relevant clauses.

The firearms clauses in the Bill do not have any evidential material to warrant their inclusion. They should be struck out.

ANNEX A TO SUBMISSION – MR M D JENVEY

Fol 15 Oct 2017:

To whom it may concern,

With reference to the recent Home Office announcement:

<https://www.gov.uk/.../home-secretary-to-consult-on-new...>

This FoI request relates to moving two firearms (.50 calibre and certain rapid firing rifles) from the general licensing arrangements to the stricter provisions of section 5 of the Firearms Act 1968.

In order to assess the reasoning behind these proposals, there has to be firm statistical evidence to show the dangers to the public (versus the infringement to the legitimate target shooting population).

I would also like to establish if this element of the consultation was already in the pipeline for the consultation, or, in light of the horrific tragedy in Las Vegas, it was added on a populist / opportunist consideration.

There is no data to support this change; from the Government's own statistics:

<http://researchbriefings.parliament.uk/.../Summary/CBP-7654>

"Since 2008/09, handguns have remained the most commonly used non-air firearm type, accounting for 42% of non-air firearm offences in 2016/17. The use of imitation firearms has increased the most among non-air firearm offences, from 18% of all non-air firearm offences in 2008/09 to 28% in 2015/16, before falling to 26% in 2016/17. Rifles have remained the least common non-air firearms type accounting for around 1% of all offences over the period."

Therefore, it is necessary to show that ".50 calibre and certain rapid firing rifles" are a notable source of crime, either now or based on future predictions.

From within Home Office data, it must be a requirement (published) to show the numbers / prevalence of those offences committed where FAC owners were involved - surely if you intend a consultation, with probable negative effects for the shooting community, it is necessary to establish a baseline figure for measurement purposes & associated best course of action - if indeed, any is required.

Since their name change from ACPO, please note that failure to publish minutes from the Firearms and Explosives Licensing Working Group (FELWG) has kept background discussions about firearms & the Police viewpoint very much in the dark. Amongst other things, this is not conducive to trust or an open exchange of views. The discussions of the FELWG need to be public.

I observe that from 2008:

<https://publications.parliament.uk/.../80602w0043.htm...>

Quote:

The potential requirements for the sharing of information between the National Ballistics Intelligence Service Database (NABIS) and the National Firearms Licensing Management System was examined, and discussed, in detail by key stakeholders (including forensic and investigatory professionals) throughout the lifetime of the project management process.

It was found that the potential crossover between the data held by the systems was very small, due to the very low instances of legally held firearms being used in gun crime and the small overlap in information shared between the two applications. Furthermore, the data descriptors of 'firearms recovered at Scenes of Crime' and 'firearms being licensed' may be somewhat different and, as a result, inquiries would be passed from NABIS to expert firearms officers in the Licensing Departments. As a consequence, it was agreed that any risk of legally held firearms being used for criminal purposes was so low that given the difficulty of automating a matching process between systems, the cost of building such an interface would outweigh any perceived benefits.

The NABIS system has been designed to accredited police corporate data model standards, which means that information sharing may be possible in the future providing that there is a business case to do so.

In short, there seems to be Home Office "interest" for a problem that did not exist then, does not exist now & is exceptionally unlikely (if at all) to exist in the future.

I am aware of the issuance of the consultation, & I do not believe that the background has been expanded in sufficient detail or that all the aspects pertaining to licensed firearms holders have been taken into account:

<https://www.gov.uk/.../offensive-and-dangerous-weapons...>

Please find my questions to be answered under Fol:

1. What was the time-line / timescale / pivotal point or exact event that dictated the inclusion of ".50 calibre and certain rapid firing rifles" in the consultation (separate sub-answers for .50 calibre & rapid firing rifles)?
2. Why were the appropriate shooting organisations (NRA / BASC etc) not consulted before the Home Office announcement?
3. Please provide copies of communication with BASC / NRA (or any such

shooting body) for the 6 weeks prior to the announcement of the consultation.

4. What department(s) instigated the process for including these categories of firearms in the consultation?

5. Please provide copies of all related (internal / external) communications with such department(s) as at Question 4 for the 6 weeks prior to the issuance of the consultation.

5. Why have these categories of firearms been included in the consultation (separate sub-answers for .50 calibre & rapid firing rifles)?

6. What is the full statistical data over the last 10 yrs to show any / all aspects of legally owned (i.e. licensed) firearms used for gun crime purposes, to include (but not limited to):

a. Type of firearm.

b. Calibre.

c. Nature of criminal activity.

7. What gun crime has been committed in the last 10 yrs by licensed owners of these specified categories of firearms (separate sub-answers for .50 calibre & rapid firing rifles)?

8. Please provide copies of ALL minutes of all meetings for the FELWG (Firearms and Explosives Licensing Working Group).

Fol 16 Oct 2017:

To whom it may concern,

The aim of this request is to establish any relevant links to the recent Home Office consultation, especially to the .50 calibre & rapid firing rifles aspects:

<https://www.gov.uk/.../offensive-and-dangerous-weapons...>

Please provide copies of all emails associated with Mark Groothuis (possibly a member of FELWG, South East representative) to/from the Home Office for the last 6 months.

Copies of FELWG minutes have been addressed under a separate Fol request (15 Oct).

ANNEX B TO SUBMISSION – MR M D JENVEY

Your request has been handled as a request for information under the Freedom of Information Act 2000.

I am sorry for the delay in replying and we would be happy for you to submit a late response to the consultation *[MDJ's note – this was not possible due to the lack of information & subsequent for an Internal Review, not answered as at 06 Jul 2018].*

Please be assured that your response will be included in the final analysis of all comments received.

I am able to disclose the following information: In answer to questions 1-6, the firearms licensing system is kept under review to safeguard against abuse by criminals and terrorists and to preserve public safety. This includes ensuring the suitability and security of people permitted to possess or trade in firearms, and preventing the diversion of lawfully-held firearms into criminal hands.

The Home Office public consultation on offensive and dangerous weapons launched 14 October 2017 included proposals on making changes in respect of large calibre and certain rapid firing rifles and was part of our continued review process. The reasons are set out in the consultation document which was published in order to gain a wide range of views rather than separately consulting individual associations. It was also the intention to obtain views on how any restrictions thought necessary might be framed bearing in mind the importance of ensuring that any definitions adequately captured the weapon types that are of concern, and are neither too narrowly, nor too widely, drawn.

No decisions have yet been made in relation to these rifles. This will be taken following the consultation and in the light of the responses received, set against the Government's assessment of the risk and threat at that time.

In response to questions 7 and 8: the Home Office holds some of the information but not all that you have requested. Information on offences involving firearms by type of weapon and type of offence is already reasonably accessible to you. The latest information was published in the Appendix Tables of the 'Focus on Violent Crime and Sexual Offences' statistical bulletin which is available here:

<https://www.ons.gov.uk/file...>

Tables 3.02 and 3.03 will be of most relevance. Historical information on offences involving firearms by type of weapon and type of offence can be found online in the following statistical bulletins: • 2001/02 to 2010/11: 'Crime in England and Wales 2001/2002: Supplementary Volume' series; and, • 2011/12 to 2014/15: 'Focus on Violent Crime and Sexual offences' series.

As explained in the public consultation and Impact Assessment, one 0.50 calibre

weapon was stolen between 2007 and 2017. *[MDJ's note – the rifle was recovered & not used in any associated crime.]*

The statistical releases detailed above do not break down the figures in such a way as to show whether the weapon was also used in crime. Section 21(1) of the FOIA exempts the Home Office from having to provide you with this information because it is already reasonably accessible to you. If you have any difficulties in accessing this information at the sources which I have indicated, please contact me again.

In response to question 9: the minutes of the Firearms and Explosives Licensing Working Group are prepared by the National Police Chiefs Council and are published on their website:

<http://www.npcc.police.uk/FELWG.../FELWG%2021%209%2017.pdf>.

[MDJ's note – this is evasive; ALL minutes were requested but not provided]

In response to question 10:

We neither confirm nor deny whether the Home Office holds any of the requested information in relation to your request for copies of all e-mails associated with Mark Groothuis specifically in relation to 0.50 calibre and rapid firing rifles by virtue of section 31(3) of the Freedom of Information Act which relate to law enforcement. This section of the FoI Act exempts us from our duty to say whether or not we hold the information you ask for. Further explanation of this decision, including the relevant public interest test, can be found in the annex to this letter. This response should not be taken as conclusive evidence that the information you have requested exists or does not exist.

ANNEX C TO SUBMISSION – MR M D JENVEY

To who it may concern,

Thank you for your reply dated 24 Jan 2018.

The response is very sparse, & to me, evasive. Moreover, the excessive timescale taken to produce so little information is very worrying. At the very least, it was grossly inefficient; at the very worst, it could be seen as deliberate concealment.

"In answer to questions 1-6, the firearms licensing system is kept under review to safeguard against abuse by criminals and terrorists and to preserve public safety. This includes ensuring the suitability and security of people permitted to possess or trade in firearms, and preventing the diversion of lawfully-held firearms into criminal hands. The Home Office public consultation on offensive and dangerous weapons launched 14 October 2017 included proposals on making changes in respect of large calibre and certain rapid firing rifles and was part of our continued review process."

This response is nothing more than waffle. There is no reason why my specific questions 1 - 6 cannot be answered. Therefore, I re-request answers to these questions.

Therefore, please answer each question 1 - 6 individually.

In particular, the omission of consulting national shooting organisations in advance is very telling; it gives the perception of pre-conceived direction, especially considering the positioning /style of questions at the end of the consultation; the majority of responses would undoubtedly be in favour of stricter controls / increased judicial sentences - knife crime & acid attacks were (are) very much in the news & it's impossible to justify easier access / lesser sentencing. So, respondents to the consultation were likely to be in the "toughen things up" mode as they rolled through the questions. The additional question at the end of the survey about firearms - especially without amplifying comments - would have attracted the same tough approach too.

Furthermore, & a significant concern, the respondent, Graham Widdlecombe, is a member of FELWG & therefore has a vested / biased interest in ensuring minimal exposure / no negative publicity / achievement of consultation aims.

9. Please provide copies of ALL minutes of all meetings for the FELWG (Firearms and Explosives Licensing Working Group).

You only provided ONE such event; my question referred to ALL; there was no limitation on timescale. Please respond again, accurately.

I am requesting an internal review of the decision not to confirm that Groothuis' emails exist (name confirmed in older FELWG minutes) & **I similarly request a more comprehensive reply**. Note that this FoI request was sent 16 Oct, not Nov as you stated. A simple mistake but it shows errors in your process & attention to detail, which further reduces my confidence in the accuracy of other elements in your response.

Example of FELWG minutes including Groothuis, & Widdlecombe ("Head of Firearms"):

<http://www.npcc.police.uk/FELWG%20Minutes/FELWG%206%209%2016.pdf>

There are action items against Groothuis in other minutes which would suggest involvement linked to the stated rifles.

"We neither confirm nor deny whether the Home Office holds any of the requested information in relation to your request for copies of all e-mails associated with Mark Groothuis specifically in relation to 0.50 calibre and rapid firing rifles by virtue of section 31(3) of the Freedom of Information Act which relate to law enforcement."

Section 31(3) of the Freedom of Information Act is not meant to be used in a way to conceal important information; the emails will show any clear trend towards a biased approach or there is a valid reason for denying such information. Considering the FELWG composition & the undoubted closeness between Groothuis & Widdlecombe, it seems highly likely that there is internal "protectionist" or evasive element in play here.

Considering:

"In response to questions 7 and 8: the Home Office holds some of the information but not all that you have requested."

Combined with:

"As explained in the public consultation and Impact Assessment, one 0.50 calibre weapon was stolen between 2007 and 2017. The statistical releases detailed above do not break down the figures in such a way as to show whether the weapon was also used in crime."

From one of the tables, for example, 3.07 shows that over 50% of fatalities are committed with handguns, almost all of which have been illegal since 1997.

Note that fatalities also includes suicides (in which the victim is also the perpetrator). I suggest that the Home Office is targeting the wrong group of people.

To remind you, one topic was mentioned in minutes from a FELWG meeting, Mar 2016:

http://shootingshed.co.uk/wp/wp-content/uploads/2015/09/FELWG_Minutes-March-2015.pdf

*Item 8.f - Theft of Firearms. "NaBIS reported that stolen firearms that go onto to be used in criminal shootings, **are extremely rare.**"*

This emphasis seems to have changed drastically.

It is impossible to break down the firearms crime statistics into those categories committed by FAC holders (i.e. legally held) or, non-FAC holders (illegally held). Moreover, statistics do not differentiate between calibre or action of rifle; a break barrel .22LR would be in the same class as a .50. Consequently, if you do not have data / statistics available, or cannot show that one of the quoted "dangerous weapons" was / was not used in a crime, then that is a huge inherent weakness within the Home Office data which adversely affects the potential findings / recommendations of the associated consultation. The risk has not been proven in any way, hence very flawed consultation which was pushed out with a "fear factor" added on.

I look forward to a far more open, transparent response. Moreover, I do not expect such a tardy reply; I will contact the Information Commissioner's Office without hesitation again should the need arise (previous complaint FS50714409).

ANNEX D TO SUBMISSION – MR M D JENVEY

Text of letter sent by Heidi Allen MP to the Home Secretary, 11 Jul 2018:

HEIDI ALLEN MP

SOUTH CAMBRIDGESHIRE
HOUSE OF COMMONS
LONDON SW1A 0AA

The Rt Hon Sajid Javid MP
Home Secretary
Home Office
2 Marsham Street
London
SW1P 4DF

11th July 2018

Dear Sajid,

I am writing on behalf of a number of constituents with regard to the provisions of the Offensive Weapons Bill relating to firearms. Many of my constituents are engaged in shooting sports. They feel that they are being unfairly targeted by the provisions in the Bill which they believe lack any evidential credibility and will not result in any reduction in firearms crime.

I appreciate that there has previously been a consultation but concerns remain about its effectiveness and the reliability of the information and evidence gathered during the consultation. In particular, my constituents are concerned about the robustness of the evidence which has led to the Home Office proposing to ban a number of firearms which are presently legal and used by the shooting sport community.

Whilst the shooting community are already subject to wide-ranging security and other checks (and they make no complaint about this), the proposals will remove two specific groups of rifles (high muzzle energy and “rapid firing”) but there does not appear to have been an adequate explanation provided to the shooting community about why this is considered necessary or what specific objective would be served by the measures.

In particular, I would be grateful if you would respond to the following issues:

1) Please confirm whether you are in a position to publish the evidence on which the Home Office relied in making its assessment that the particular types of firearms should be banned. If you are not in a position to publish that evidence in full, please explain the justification for withholding that information. Concerns have been expressed to me about the lack of transparency, particularly as the National Crime Agency and ACPO were consulted as part of the consultation.

2) Please outline what specific evidence was taken into account by the Home Office in deciding to ban these types of rifles.

3) During the consultation, concerns were expressed by respondents about the (i) methodology, (ii) evidence of causation and (iii) risk assessments undertaken by the Home Office when deciding to proceed with its plans. Please confirm the specific measures used by the Home Office in assessing (i) to (iii).

4) Please advise what assessment has been made by the Home Office about public safety issues and confirm the number of offences recorded in each of the last five years which involved rifles of the types which it is proposed to ban and of those offences, please confirm the number of rifles which were legally held.

5) Please advise what reductions in the level of crime are anticipated as a result of the measures in the Bill regarding firearms.

6) As outlined above, there are stringent regulations and safeguards associated with the obtaining of a firearms certificate. They are clearly considered by the Home Office to provide the best way of ensuring public safety. As a result, please advise why those safeguards are not considered to be sufficient in relation to the rifles which the Bill would ban.

I am grateful for your consideration of these issues on behalf of my constituents.

Yours sincerely
Heidi Allen

MP for South Cambridgeshire

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