

COUNTRYSIDE ALLIANCE BRIEFING NOTE:

PROPOSED ALIGNMENT OF SECTIONS 1 AND 2 OF FIREARMS ACT 1968

Contents

Key Points	2
Background	3
Current licensing requirements:	4
Section 2	4
Section 1	4
Current Firearms Licensing Structures	6
Impacts of Full Alignment	6
Countryside Alliance Position	8
Value of Shooting	9
Technical Data	9
Current Differences Between Section 2 Shotguns and Section 1 Firearms	9
Comparative Lethality of Section 2 Shotguns and Section 1 Firearms	9
Conclusion	10

Key Points

- **British firearms legislation is amongst the most stringent in the world. To own either a Section 2 shotgun or Section 1 firearm, the same rigorous character suitability, background and medical requirements must be met.**
- **Full alignment of Section 2 with Section 1 of the Firearms Act 1968 is unnecessary and would deliver little tangible benefit for public safety.**
- **Full alignment would bestow a considerable additional administrative burden upon police firearms licensing units, which are already stretched to capacity. The financial and logistical burden on gun owners and traders would likewise be substantial and would cause significant damage to the rural economy, conservation efforts and communities across the country and especially in the more remote parts of Britain.**
- **As part of any changes to the status of Section 2 shotguns, a single, centralised firearms licensing body with full digitisation should be created to replace the current 43 separate licensing authorities in Britain. The body should be akin to the DVLA or DBS, which would improve public safety, provide a consistent service for gun owners and allow police forces to focus on law enforcement, rather than licensing – a function they were never set up to deliver. Shotgun and firearms licences should be digitised in a central database to allow real-time checking by dealers and private sellers.**
- **A centralised licensing body would directly address many of the deficiencies which have led to issues with the current system. If improved public safety is the issue, then the first step must be to address a licensing system that urgently needs modernisation. Even full alignment of Section 2 and Section 1, which would have severe economic and social consequences, would not improve public safety if the underlying system remains flawed.**

Background

- Firearms controls in the UK are among the most stringent in the world. However, the government is proposing to consult on changes to the current rules including greater alignment between the conditions for licensing Section 1 and Section 2 firearms under the 1968 Firearms Act. This follows two tragic incidents involving shotguns licensed under Section 2:
 - In 2021, Jake Davison murdered 5 people with a legally held Section 2 shotgun. Devon and Cornwall Police were warned on multiple occasions of Davison's unsuitability to possess a Section 2 shotgun. The inquest into the shooting found "serious failure" by the police firearms licensing unit failing to follow the current, stringent firearms legislation in granting and later failing to revoke Davison's shotgun licence. In response the coroner's inquiry into this incident, a Firearms Enquiry Officer (FEO) training programme was introduced in 2024 by the College of Policing.
 - In 2024, Nicholas Prosper used a forged paper Section 2 shotgun certificate to acquire a Section 2 shotgun in a private sale. Nicholas Prosper was not licensed to possess or acquire a Section 2 shotgun. He used the shotgun to murder three members of his family before the false transfer could be flagged by the licensing authority. The establishment of real-time checks of the National Firearms Licensing Management System by dealers and private sellers would prevent this from being possible. In response to this incident, the Bedfordshire Police and Crime Commissioner called for "a national database of firearm licence holders" – a proposal supported by the Countryside Alliance.
- As at 31 March 2024, there are 172,509 Section 1 licence holders, 539,607 Section 2 shotgun licence holders and 3,208 Registered Firearms Dealers in England, Scotland and Wales for whom legitimate shotgun ownership and use is an integral part of both work and way of life.
- Firearms legislation as we know it was introduced in 1920, when rifles were subject to licensing by local chief constables. The 1920 Act was brought in in response to crime and risk of civil unrest in Britain and Ireland in the wake for the First World War, when there was an abundance of military rifles available. Licensing of shotguns was not introduced until 1968.
- The differences between Section 1 and Section 2 firearms are based on a recognition not only of the difference in lethality between Section 1 and Section 2 firearms but also the purposes for which they are used, by whom and the practical circumstances in which they are used. For example, it is an offence to use a shotgun or low powered rifle to shoot a deer precisely because they are less lethal and would therefore cause an animal welfare issue.
- What matters in terms of public safety is that anyone having access to any type of firearm is a fit and proper person who poses no risk to the public or themselves. The law is already the same for background, suitability and medical checks conducted by licensing authorities in advance of issuing licences, whether Section 1 or Section 2.

Current licensing requirements:

Section 2:

- **To hold a Section 2 shotgun certificate the applicant must:**
 1. Have good reason for possessing a shotgun.
 2. Pass background, character and medical checks. Following the government's February 2025 response to the 2023 consultation on recommended changes to firearms legislation, applicants will have to nominate two referees to provide character references, increased from the one referee previously required.
 3. Demonstrate their suitability in a face-to-face interview with a FEO
 4. Have suitable storage for their firearms approved by the police. Police FEOs inspect storage and security arrangements before granting a certificate, and frequently when renewal applications are processed.
- Section 2 shotgun certificate holders may possess any number of shotguns on their certificate, so long as they have the required storage and security arrangements.
- Sale or transfer of Section 2 shotguns can be conducted freely between those holding shotgun certificates and/or registered firearms dealers. Both buyer and vendor must inform the police of the transfer within 7 days.
- In total ca. 150,000 Section 2 shotgun transfers are processed in England, Scotland and Wales each year.

Section 1:

- **To hold a Section 1 firearms licence the applicant must:**
 1. Prove good reason for possessing each individual firearm.
 2. Pass background character and medical checks. Applicants must nominate two referees to provide character references.
 3. Demonstrate their suitability in a face to face interview with a FEO.
 4. have suitable storage for their firearms and any ammunition approved by the police. Police FEOs inspect storage and security arrangements before granting a certificate, and frequently when renewal applications are processed.
- Section 1 firearm licence holders may only possess the number and type of firearms as exactly stipulated on their certificate and satisfy the police that they have good reason to possess each firearm.
- Sale or transfer of Section 1 firearms must be conducted through the certificate 'variation' process, which must be conducted in advance, unless the purchaser has a vacant 'slot' on their certificate, which would be the case for a new licence holder. The variation process, which is controlled by police licensing departments, carries a £47 cost to the

applicant if the variation is not like-for-like and is often subject to lengthy delays. Police must be informed of transactions by all parties within 7 days.

- In total ca. 3,700 Section 1 firearms variations and are processed in England, Scotland and Wales each year.

Key differences between Section 1 and Section 2 requirements:

Reason

- A person must prove good reason for each Section 1 firearm they wish to possess. For a Section 2 shotgun they need only have a good reason for having a shotgun.

Number of firearms

- Section 1 firearm licence holders may only possess the number and type of firearms as exactly stipulated on their certificate. Section 2 certificate holders may possess any number of shotguns.

Ammunition

- Section 1 ammunition must be stored securely. Section 2 shotgun ammunition must be stored in a way that avoids access to those unauthorised to hold it.
- Transactions of Section 1 ammunition must be recorded on the firearms certificate, but the police need not be notified. For Section 2 shotgun ammunition no record is required.
- Section 1 firearms licence holders can only hold and purchase the quantity of Section 1 ammunition stipulated on their certificate. Section 2 licence holders are not limited in the quantity of shotgun ammunition they may hold or purchase.

Sale and transfer

- Unless a 'vacant slot' is on one's certificate, sale or transfer of Section 1 firearms must be conducted through the certificate 'variation' process, which must be conducted in advance. The process, which is controlled by police licensing departments, carries a £47 cost to the applicant for non-like-for-like variations and is often subject to lengthy delays. Police must be informed of transactions by all parties within 7 days. Section 2 shotgun transfers can be conducted freely between those holding shotgun certificates and/or registered firearms dealers. Both buyer and vendor must inform the police of the transfer within 7 days.

Borrowing or lending

- A Section 1 firearm may be used by a person who is not licensed to hold that firearm only in the presence of the owner. Age restrictions apply.
- A Section 2 shotgun may be lent by the person to whom it is licensed to another licence holder for up to 72 hours without the requirement to enter the details of the gun onto the borrower's certificate or inform the police. The borrower and firearm do not need to remain in the presence of the lender during that 72-hour period.

Current Firearms Licensing Structures

- Firearms licensing is conducted by 37 separate bodies, consisting of 43 individual or collective police forces in England, Scotland and Wales. The interpretation and implementation of firearms law, despite the introduction of statutory guidance, varies across forces.
- Many police forces are unable to provide an acceptable service level for firearms licensing. In 2024 Gloucestershire Police was unable to fulfil its statutory duty and ceased granting firearms licences for a period. This year, 2025 a collective police licensing authority declared a critical incident in its licensing activities.
- The 2021 Plymouth shooting was attributed to the “serious failure” of Devon and Cornwall Police to conduct firearms licensing according to the law and statutory guidance. This tragic incident and its attributed causation prompted the 2023 consultation on ‘recommendations for changes made to the Home Office’.
- Both Section 1 firearm certificates and Section 2 shotgun certificates are printed on security paper, with watermarks and UV fluorescent ink. Variations and transfers are indicated on certificates manually with ink by RFD or private seller. The police must be informed of the variation or transfer by both transferor and transferee within seven days of the transaction for Section 2 shotguns and Section 1 firearms.
- Following the findings of the coroner’s report of the Plymouth shooting, in 2024 a formal training programme for FEOs was introduced by the College of Policing. The course includes range days hosted by the British Shooting Sports Council, which allow FEOs the opportunity to handle and fire the firearms they licence.

Impacts of Full Alignment

Full alignment would be hugely damaging for the shooting industry, and the rural economy more widely. It would also create an unmanageable burden for the police without any improvement in public safety.

Police forces

- In a scenario of full alignment of Sections 1 and 2 of the Firearms Act 1968, the increase in administrative burden on police forces would be considerable. All 150,000 shotgun transfers would become firearms variations (currently 3,700 p.a.), which require significantly more police hours to complete. It should be noted that a number of forces would be unable to meet the additional administrative burden – many struggle to cope with the current conditions.

Shooting community

- If Section 1 conditions were applied to Section 2 shotguns there is a great risk that they would be applied unnecessarily and unwarrantedly to the detriment of shooting activities and purposes.
- Full alignment would lead many shotgun shooters to give up their involvement in shooting. If participation in shooting decreased by 1/3 then the loss to the UK economy would be £1.1 billion.
- The increased cost to licence holders from shotgun transfers having to be treated as variations could be £7 million p.a.. not to mention the cost to the police. The impact of

such cost increase would invariably lead to a downward trend in shotgun sales, causing harm to the UK economy both in terms of trade but also in the numbers engaged in shooting activities.

- The economic impact of full alignment across the wider economy and especially in rural areas would be significantly greater than £7 million from job losses to losses of businesses dependent on shooting.
- Applying a Section 1 level of burden of proof of good reason for Section 2 licensees would also lead to many people giving up shooting and shotgun ownership. The bureaucratic burden would make shotgun ownership considerably less attractive, especially for those occasional shooters.
- For Section 1, proof of good reason might take the form of rifle club membership or written permission from a landowner to manage deer on their land. Such examples would be difficult for many with shotguns, as many might only shoot game or clays a few times a year by non-guaranteed invitation.
- Section 1 ammunition is usually stored in low volume and is easily accommodated in a small safe, or compartment within a gun cabinet. Section 2 shotgun ammunition is bulkier and used in much larger volumes than Section 1 ammunition and is therefore often stored in larger amounts. The same level of secure storage would be impractical and unaffordable for those without means and space should Section 1 and 2 be fully aligned. Full alignment would therefore disproportionately impact those in lower-income households.
- The loss of the 72-hour borrowing/lending rule for Section 2 shotguns in the case of full alignment would cause significant difficulty and disruption for many Section 2 licence holders in a variety of situations such as when travelling to participate in shooting.
- Section 1 style licensing of individual Section 2 shotguns would cause the unnecessary disposal of many antique and valuable shotguns. Many licensees have gun cabinets containing historic and varying styles of shotgun which might only be used very occasionally, as such Section 1 style individual licensing may require their sale or disposal with no benefit to public safety.

Rural communities

- A reduction in those shooting would result in many jobs being lost, from gamekeepers and clay shooting coaches to gun dealers and those working in the many rural businesses which rely on shooting, especially during the winter months, such as bar and hotel staff.
- Shooting often underpins rural communities, and without it many faced with loneliness and lack of opportunity would lose a key conduit for socialising and physical exercise. There is also a likelihood that more remote schools, post offices and pubs would be forced to close.
- Shooting in its many formats has formed an important part of rural British life for at least two centuries and should therefore be considered to have intangible cultural value which would be placed at risk in a full alignment scenario.

Conservation and Farming

- Full alignment would hinder the ability of farmers to protect their crops and livestock. Farmers rely on shooters to manage pest species.
- The wildlife management and conservation activities carried out by those involved in shooting would suffer, putting many of our rarest species of ground-nesting bird, such as the curlew and lapwing, at greater risk. A reduction in shooting would lead to fewer cover crops, less predator control, less tree planting and woodland

management on farmland, supplementary feeding of farmland birds and more. The Game and Wildlife Conservation Trust has conducted many peer reviewed studies into the positive conservation impacts of land management for game shooting.

- Reducing shooting activity would directly threaten the government's 2024 manifesto promise to "promote biodiversity and protect our landscapes and wildlife".

Countryside Alliance Position

- The Alliance has always supported changes to firearms law and guidance that improve public safety. For example, we supported the increase to two referees for Section 2 applicants which brings Section 2 into line with Section 1. However, we do not support alignment or other changes that do nothing to improve public safety, while harming an important industry which contributes so much to communities and to the management and restoration of the environment.
- Since 1968 there has been increasing alignment of shotgun (Section 2) and firearm (Section 1) legislation, resulting in the current system, which is one of the most stringent and safest firearms and shotgun laws in the world but these changes have all recognised that public safety is what matters, while recognising the important distinction between different types of firearms and the role they play economically, socially and in terms of wildlife management.
- Examining recent incidents of the criminal misuse of Section 2 shotguns, it is clear that: full alignment is not necessary; there would be no tangible benefit to public safety from full alignment; and that the area that needs attention is the licensing process rather than legislation itself. The issues identified in the recent inquiry following the 2021 Plymouth shooting could be addressed with changes to the operation of licensing rather than full alignment, which would only burden the police and the shooting community.
- The licensing of firearms by police forces is a vestige of the Firearms Act 1920, similar to how county and borough councils used to conduct vehicle registration and driver licensing as a result of the Motor Car Act 1903. It should be noted that police forces have never been set up with firearms licensing as a core function.
- The Countryside Alliance proposes significant reform in the underlying way firearms licensing is performed and processed in Britain, which would address current concerns and weaknesses without harmful consequences to individuals, rural communities, the economy and the environment. We advocate the creation of a single, central licensing authority, along the lines of DBS and DVLA, which would have regional teams of FEOs.
- For firearms licensing still to be conducted in the outdated manner of 1920 by so many separate licensing authorities is both ineffective and inefficient. We need a purpose-built, effective and efficient single licensing body that provides licence holders with a consistent and efficient service whilst delivering the highest levels of public safety.
- We propose that the National Firearms Licensing Management System is fully digitised and accessible in advance of or at the point of sale by a licence holder wishing to conduct a firearm or shotgun transaction to eliminate risk of illegitimate transactions including the creation of fake firearms and shotgun certificates. This would enable real time tracking of firearm and shotgun ownership by licensing authorities. This would prevent a repeat of the 2024 Prosper shooting.
- To alleviate administrative burdens further for licensing authorities, sound moderators, also known as 'silencers', should be removed from the list of defined Section 1 firearms. This action would come with no increase of risk to public safety. In Spring 2024 the then government announced its intention to remove sound

moderators from firearms licensing controls and launched a consultation on the proposal. The outcome of this consultation is awaited.

Value of Shooting

- The 2024 Value of Shooting report, conducted by Cognisense, evidences the major contribution that shooting makes to the rural economy, conservation and social wellbeing.
- Shooting is worth £3.3bn to the UK economy, Gross Value Added per annum.
- Shooting activities generate the equivalent to 67,000 full-time jobs.
- Shooting providers and volunteers carry out conservation work to the value of £500m, equivalent to 26,000 full-time jobs and 14m workdays per annum.
- Three out of four people who take part in shooting say that it important to them and their personal wellbeing. This takes the form of both social interaction and physical exercise.
- Shotgun shooting contributes greatly to ancillary industries, such as hotels and shops in the more remote regions of Britain, especially in colder months when there is less of a tourist trade.

Technical Data

Current Differences Between Section 2 Shotguns and Section 1 Firearms

- A Section 2 shotgun is defined in the Firearms Act 1968 as a “*smooth-bore gun (not being an air gun), which has a barrel not less than 24” in length and [...] not exceeding 2” in diameter; either has no magazine or has a non-detachable magazine incapable of holding more than two cartridges; and is not a revolver*”.
- Section 2 shotgun cartridges are those which contain five or more shot, none of which exceeds 0.36” in diameter.
- Section 1 shotguns are those which do not meet the criteria for Section 2, e.g. those with a detachable magazine, or which can hold more than two cartridges in a non-detachable magazine.
- Section 1 air guns are those which have a muzzle energy greater than 12 ft·lbs.
- Section 1 rifles cannot be automatic or semi-automatic, with the exception of .22 rim-fire rifles, which may be semi-automatic. Section 1 rifles must have a barrel at least 30 cm in length.

Comparative Lethality of Section 2 Shotguns and Section 1 Firearms

- All air weapons, shotguns and rifles are classified as “lethal” by the Firearms Act 1968. Only airsoft guns are not classified as “lethal”. The terminology used in the Act is “lethally barrelled”.
- Firearms legislation as we know it was introduced in 1920, when rifles were subject to licensing by local chief constables. The 1920 Act was brought in in response to crime and risk of civil unrest in Britain and Ireland in the wake for the First World War, when there was an abundance of rifles available. Licensing of shotguns was not introduced until 1968.
- Bullets fired from Section 1 firearms can travel 2-3 miles and can be lethal at ranges of well over one mile.
- The lethal range of a shotgun with ammunition legal under Section 2 is approximately 50 yards. Section 1 shotgun ammunition, e.g. solid “slugs” have a lethal range of 150

yards. Shot can travel further than these ranges but is very unlikely to be lethal to humans.

- It is an offence under Section 4 of the Deer Act 1991 to shoot a deer with a shotgun because they are less lethal than rifles deemed suitably lethal for deer.
- Section 2 shotguns can fire one, two or a maximum of three shots before they must be reloaded by hand. Section 1 firearms are not restricted in their magazine capacity and therefore can fire many more than three shots before reloading is required. This is a reason for difference in licensing criteria but not suitability of individuals, which is the same and is key in terms of public safety.

Conclusion

A reformed licensing process would improve public safety and support the legitimate shooting industry. Simply aligning Section 2 with Section 1 would add hugely to the burden on police forces whilst achieving nothing beyond harming the shooting community, rural businesses, the economy and the environment.

The Countryside Alliance will continue to support reform that demonstrably delivers greater public safety and calls on the government to address the root cause of problems, based on experience and findings following failures that have led to recent tragic events, which is not about alignment but about how licensing is delivered.