



COUNTRYSIDE ALLIANCE BRIEFING NOTE:

PROPOSED ALIGNMENT OF SECTIONS 1 AND 2 OF FIREARMS ACT 1968

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Key Points

- **British firearms legislation is among 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. An alignment of referee requirements for the two Sections was brought in by this government following its announcement in February 2025.**
- **Full alignment would bestow a considerable additional administrative burden on police firearms licensing units, which are already stretched to capacity. This may prove detrimental to their ability to uphold public safety whilst delivering a satisfactory service.**
- **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, especially in the more remote parts of Britain. Alignment would reduce the total value to the shooting community, the Exchequer and the wider UK economy by £2.38 billion in the first year, and would result in a loss of 13,600 to 17,400 full-time employees.**
- **If improvement of public safety is the key consideration and the government concludes that changes are necessary, rather than counterproductive alignment of Sections 2 and 1, a single, centralised firearms licensing body with full digitisation should be created to replace the current 43 separate licensing authorities in England and Wales.**
- **Akin to the DVLA or DBS, this body 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.**

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 brought Section 2 into line with Section 1. However, we do not support full 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 laws in the world. These changes have all placed public safety as paramount, 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 the area that needs attention is the licensing process rather than the legislation itself. The issues identified in the 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. Police forces were never set up with firearms licensing as a core function.
- The Countryside Alliance proposes significant reform in the underlying way firearms licensing is conducted in England and Wales, 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 based on a 1920s system with 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, while 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. It would prevent a repeat of the 2024 Prosper shooting.

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 (firearms like rifles etc.) and Section 2 (standard shotguns) 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 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 to follow the current, stringent firearms legislation in granting and later failing to revoke Davison's shotgun licence. In response to 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 have prevented 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 2025, there were 170,529 Section 1 licence holders, 526,402 Section 2 shotgun licence holders and 3,113 Registered Firearms Dealers in England, Scotland and Wales for whom legitimate firearms 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 following the First World War due to concerns about crime and risk of civil unrest in Britain and Ireland, 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 their difference in lethality, but also of the user profile and the purposes for which and 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, an exception being "the farmers' defence".
- 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.
- Licensed shotgun holders account for a vanishingly small proportion of criminal activity: ca. 0.00006% of all recorded crime in England and Wales over the past six years, according to Gun Trade Association research.

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. Applicants have to nominate two referees to provide character references, as for Section 1, increased from the one referee previously required following the government's February 2025 alignment of Section 2 and Section 1.
 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.
- To be granted a shotgun certificate, the issuing police chief constable must be satisfied that the applicant has good reason for it.
- 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 firearms licence holders may only possess the number and type of firearms as exactly listed on their certificate and prove to the police that they have good reason to possess each firearm.
- Sale or transfer of Section 1 firearms can be conducted between those holding firearms certificates and/or registered firearms dealers. It must be conducted through the certificate 'variation' process, which is required to be completed in advance of the transaction. The process, which is controlled by police licensing departments, carries a £47 cost to the applicant 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, i.e. in a locked safe. Section 2 shotgun ammunition must be stored in a way that prevents 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 such record is required.
- Section 1 firearms licence holders can only hold and purchase the quantity of Section 1 ammunition stipulated by the police licensing department on their certificate. Section 2 licence holders may purchase and hold any amount of shotgun ammunition so long as the holder can store them in line with the statutory guidance and explosives regulations.

Sale and transfer

- To sell, buy or transfer a Section 1 firearm, a 'variation' must be applied for and obtained from the police firearms licensing department in advance of the transaction. The process carries a £47 cost to the applicant and is often subject to lengthy delays. Section 2 shotgun transfers can be conducted freely between those holding shotgun certificates and/or registered firearms dealers.

Borrowing or lending

- A Section 1 firearm or Section 2 shotgun 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 Section 2 licence holder for up to 72 hours. The borrower and shotgun do not need to remain in the presence of the lender during that 72-hour period.

Current Firearms Licensing Structures

- Under the Firearms Act 1968, the chief constable of each police force is legally responsible for firearms licensing in their area. There are a handful of firearms licensing collaborations between forces, resulting in the 43 chief constables presiding over 38 separate firearms licensing departments. Each chief constable sets the risk tolerance in their own area. Therefore, the interpretation and implementation of firearms law varies across forces, sometimes leading to mistakes in judgement, despite the introduction of statutory guidance.
- 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. In January 2026 His Majesty's Inspectorate of Constabulary and Fire & Rescue Services reported "accelerated cause for concern" in its inspection of the tri-force collaboration area of Bedfordshire, Cambridgeshire and Hertfordshire Constabularies, citing inadequate management of licensing arrangements causing risk to public safety.
- 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 failure of police firearms licensing prompted the 2023 consultation on 'recommendations for changes made to the Home Office'.
- 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.
- Both Section 1 firearm certificates and Section 2 shotgun certificates are still printed on security paper, with watermarks and UV fluorescent ink. Shotgun or firearms transactions are indicated on certificates manually with ink by the RFD or private seller. The police must be informed of the transaction by both transferor and transferee within seven days of the transaction. In the case of Prosper, he forged the paper certificate, and murdered his family before the police had noticed the anomaly of the vendor's report. Alignment of Sections 1 & 2 would not have prevented this; a modern licensing mechanism may have done.

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 the administrative burden on police forces would be considerable and the results counterproductive. When licensing departments are unable to cope with administrative burdens, public safety is negatively impacted. Suitability reviews of licence holders are delayed, as evidenced by HMICFRS's January 2026 report into Bedfordshire, Cambridgeshire and Hertfordshire's firearms licensing operations, which found 'accelerated cause for concern'.

- All 150,000 shotgun transfers would become firearms variations (currently 3,700 p.a.), which require significantly more police hours to complete compared to a simply logging a transfer. 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 demands.

Shooting community

- Applying a Section 1 level of burden of proof of good reason for Section 2 licensees would lead to many people giving up shooting and shotgun ownership. The bureaucratic burden would make shotgun ownership considerably less attractive, especially for 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 they might only shoot game or clays on a few occasions over a 5-year licence duration by verbal invitation.
- Raising the barrier to entry would damage the UK's ability to compete in shooting sports on the international stage. At the Paris 2024 Olympics, Team GB won gold and silver medals in shotgun shooting disciplines.
- 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.
- If Section 1 'conditions' were applied to Section 2 shotguns there is a great risk that they would be applied unnecessarily, to the detriment of shooting activities and purposes.
- Full alignment would lead many shotgun shooters to give up their involvement in shooting. Research conducted by the Gun Trade Association calculates the economic fallout of alignment at a £875 million reduction in Gross Added Value of the UK shooting sector, and a £2.38 billion hit to the value to the wider UK economy from reduced economic value of the firearm and ammunition sectors and sectors related to final demand of shooting.
- 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.
- Research conducted for the Gun Trade Association calculates that alignment would result in the overall loss of between 13,600 and 17,400 full time employees in the UK firearm, ammunition and sectors connected to final demand.

Rural communities

- Shooting is an invaluable element of the rural community, both socially and economically.
- A reduction in those shooting would result in many jobs being lost, from gamekeepers and clay shooting instructors to gun dealers, independent gunsmiths 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 would lose a valuable opportunity for socialising and physical exercise.
- In more remote villages schools, post offices and pubs are often kept open by the presence of shooting estates. These establishments might be forced to close in a full-alignment scenario.
- 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.
- Raising the barrier to entry through alignment would create practical and financial difficulties for those aspiring to work in vocational trades which require experience and possession of shotguns to enter, e.g. land management.

Conservation and Farming

- Farmers rely on shooters to manage pest species. Full alignment therefore would hinder the ability of farmers to protect their crops and livestock due a reduction in the number of shotgun licensees.
- 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, less 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. The value of this privately funded conservation work was calculated at £500 million per annum in the 2024 *Value of Shooting* report.
- Reducing shooting activity would directly threaten the government's 2024 manifesto promise to "promote biodiversity and protect our landscapes and wildlife", as well as the government's legally binding biodiversity targets.

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 £3.3 billion to the UK economy in 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 £500 million, equivalent to 26,000 full-time jobs and 14 million 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 pellets, 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 / BB guns are not classified as “lethal”. The terminology used in the Act is “lethally barrelled”.
- 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 have a fallout range of 300 yards, but is very unlikely to harm, let alone be lethal to humans at such a range.
- Under normal conditions 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. There are certain defences in circumstances of humane dispatch, marauding, etc.
- 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 differing licensing criteria, but those relating to suitability of individuals are the same and are 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 reforms that demonstrably deliver greater public safety. We call on the government to address the root cause of problems that have been identified, based on experience and findings following failures that have led to recent tragic events. The key issue is not alignment but how licensing is delivered.