



MINISTRY OF DEFENCE

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DLRSC/10/1

Date: 10 Jul 08

RANGE SAFETY POLICY LETTER 01/08 - CIVILIAN USE OF MOD RANGES BY CLUBS AFFILIATED TO THE NATIONAL RIFLE ASSOCIATION

Reference:

- A. DLRSC/10/7 dated 7 Apr 08.
- B. Sec DLRSC email 20080421-MoD & NRA AGREEMENT-U.

Introduction

1. The Defence Land Ranges Safety Committee (DLRSC) has agreed with the National Rifle Association (NRA) a set of requirements for civilian use of MoD ranges by clubs affiliated to the NRA. The Agreement was promulgated to the NRA at Reference A and to DLRSC members at Reference B. The NRA agreed to implement the MoD requirements by no later than 1 Jul 08. The requirements are detailed below and include arrangements for checking compliance in the future.

Safe Shooting System

2. The NRA has introduced and will maintain a system for the safe civilian use of MoD Ranges, known as "the NRA Safe Shooting System (SSS)", which is based upon the Army Safe System of Training (SST). The NRA SSS is therefore based upon the principles; Safe Person; Safe Equipment; Safe Practice; and Safe Place. Details of the NRA SSS are at Annex A.

Certification

3. By no later than 1 Jan 09 each civilian belonging to a club affiliated to the NRA who is shooting on a MoD range is to carry a certificate of safety and competence signed by the chairman of a club of which he is a member, stating that he is safe and competent to use the type(s) of firearm concerned.

4. The NRA requires the chairman of each club affiliated to the NRA to certify annually in writing all those club members who they judge to be safe and competent. NRA members can be certified by an officer appointed by the Chairman of the NRA.

Training

5. New shooters who are neither full members of a club affiliated to the NRA nor full members of a Home Office Approved Club must complete one of the training courses listed below before they can be certified as safe and competent to shoot on MoD ranges with the type(s) of firearm specified.
 - a. The NRA Probationary course.
 - b. A Club Probationary Course accredited by the NRA.

High Muzzle Energy Ammunition (4500J – 7000J)

6. The NRA has introduced special procedures for civilian shooters using ammunition which generates muzzle energy in excess of 4500J. (Note: no firearm with a muzzle energy exceeding 7000 J may be used on a MoD range). These procedures are specified at Annex B.

Investigations and Checks

7. Investigations of range incidents involving civilian shooting clubs will be led by the MoD. The chairmen of clubs affiliated to the NRA, and whose clubs use MoD ranges, have signed an agreement with the NRA undertaking that their clubs will take part in any discipline / accident investigation conducted jointly by the NRA and the MoD following an incident on an MoD range and that their members will assist fully in such investigation.
8. The NRA has instructed the chairmen of affiliated clubs to require their members to allow an official of the NRA or the MoD to select at random rounds being used on a MoD range so that such rounds can be checked and/or tested as being within the limits for the range.

Exceptions to Certification and Training Requirement

9. The following are defined exceptions to the requirements for certification and training given in paragraphs 3-5 above:
 - a. **Club Guest Days.** All Home Office Approved Clubs are entitled to hold a maximum of 12 Guest Days per year (the NRA as a National Governing Body is entitled to 40 per year). At these events, all guests will use firearms which have been zeroed by National Governing Body qualified coaches or competent Club members and will be supervised one-to-one by competent Club members. Ammunition and firearms that generate a muzzle energy in excess of 4500J will not be used. All loading and unloading of the firearms will be done by the competent coach or club member.
 - b. **NRA Open Days.** By arrangement with the Home Office, the NRA holds up to 3 Open Days per year. At these events, all guests will use firearms which have been zeroed by National Governing Body qualified coaches or competent Club members and will be supervised one-to-one by competent Club members. Ammunition and firearms that generate a muzzle energy in excess of 4500J will not be used. All loading and unloading of the firearms will be done by the competent coach or club member.
 - c. **Foreign Shooters.** All foreign shooters wishing to shoot on MoD ranges will be required to produce evidence that they have been certified as safe and competent to a similar standard by the relevant National Governing Body for shooting in their home country and to be sponsored by the NRA or a club affiliated to the NRA.
 - d. **Serving Military or Police personnel.** These may be certified as safe and competent for that type of firearm(s) by their Commanding Officer / senior officer, and for

former military or police personnel whose competence can be tested by an assessment and certified by their club chairman.

e. **Probationary Members.** Probationary Members undergoing training will not be certified but will have a log book recording their training to date and will be supervised one to one by a competent club instructor certified by the Chairman of the Club or qualified through the NRA

Compliance Checking

10. To provide assurance that the NRA SSS remains a satisfactory system for the safe civilian use of MoD ranges, that it is being applied by NRA affiliated clubs on MoD ranges and that club training and member certification is taking place as required, compliance checks of these activities will be made as an extension to the overall MoD range safety inspection system.

11. A representative of the Range Administering Unit (RAU) or the Range Authorising Officer (RAO) may at any time visit the range when shooting is being conducted by a NRA affiliated or Home Office Approved club for the purpose of verifying that the NRA SSS is being followed and that club members on the range are in possession of a valid certificate of safety and competence and, in the case of the RCO, proof of qualification. Similarly, MoD Range Inspectors may visit clubs shooting on MoD ranges at any time to check that RCO and firers are carrying the correct documentation and to confirm the range practices are being conducted appropriately.

12. The following records will be held for at least 12 months and made available for inspection on request from MoD personnel:

a. **NRA.** The NRA will keep a record (paper or electronic) of:

- (1) all shooters who undertake training on NRA courses.
- (2) current certified RCOs / Club Coaches / Club Instructors.
- (3) club agreements (template is at Annex C).
- (4) NRA members who have been certified by the NRA (the applications for certification).
- (5) all high muzzle energy (HME) Zeroing targets for a period of 12 months.
- (6) a list of clubs whose probationary training programme has been approved by the NRA.

b. **Clubs Affiliated to the NRA.** Clubs will keep records to demonstrate that they are conforming to the NRA Safe Shooting System. The records will enable the MoD and NRA to confirm that any firer who shoots with a club is certified as safe to do so by the chairman. The Club Chairman will be responsible for keeping and retaining records of:

- (1) the training of all new members.
- (2) all firers who have been certified by the Club Chairman as safe for the type of firearm being used.
- (3) the RCO(s) running the range on each practice (a log with dates).
- (4) a list of current RCOs, Club Coaches and Club Instructors.
- (5) all HME Zeroing targets for a period of 12 months.

A copy of the Club Agreement (Annex C) completed and signed by the Club Chairman will be provided to the RAU on request.

c. **Certified RCO.**

(1) The RCO will present his/her RCO identity card to the range staff when signing on the MoD Form 906/906A (Range Log) to take over the MoD range.

(2) The RCO is to confirm the practices to be fired with the range staff and, where HME practices are to be fired, confirm that he/she and the firers are fully competent and certified to carry out such practices.

d. **Firers.** At all times on the range firers will carry their FAC and the club certificate which certifies them as safe to fire with the type of firearm which they will be using.

13. The NRA will conduct a review of a number of affiliated clubs each year throughout the country. The Secretary General of the NRA will be responsible for ensuring the NRA checks take place and for compiling an annual report for the MoD providing the details of work carried out in year.

14. The NRA will conduct checks throughout the year at Bisley and will ensure that all competitors entering NRA competitions at Bisley produce their certification card before being issued with their squadding cards and being allowed to shoot.

Original signed

G C Brown
Secretary DLRSC

Annex:

- A. The NRA Safe Shooting System.
- B. High Muzzle Energy Procedures.
- C. Club Agreement and Order Form

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THE NRA SAFE SHOOTING SYSTEM

1. The MoD requires all civilian organisations using military ranges to have an auditable system of training based on a specific risk assessment. In response, the NRA has developed a Safe Shooting System (SSS), which has been approved by the MoD. All clubs affiliated to the NRA who use military ranges must adopt the NRA SSS. By 1st January 2009, civilian shooters must also have an annual certificate of competence signed by their Club Chairman.

2. Organisations with existing MoD-approved Codes of Practice (e.g. BDS and MLAGB) are not required to follow the NRA SSS. Other groups, however, will need to adopt the NRA system or have their system approved by the NRA. The NRA SSS is based on four elements: safe person, safe equipment, safe practice and safe place.

a. Safe Person. The safe shooter is someone who has received the information, training and supervision to enable them to acquire knowledge and develop the skills necessary to demonstrate that they can handle firearms and ammunition safely. The NRA probationary course provides this training.

b. Safe Equipment. The NRA Rules of Shooting, published annually, define the types of firearms and ammunition that may be used for target shooting. The individual shooter is responsible to his Club Chairman for ensuring that his firearm is properly maintained and that the ammunition used is in every way safe and within the range parameters for muzzle velocity (MV) and muzzle energy (ME). Only copper or steel jacketed lead core or solid lead rounds may be fired by civilians on MoD ranges.

c. Safe Practice. The NRA Rules of Shooting contain detailed regulations concerning the conduct of shooting for all its shooting disciplines. Qualified NRA RCOs are responsible for the safe running of MoD ranges for civilian shooters. Additional RCO qualifications are required if Sporting Rifles, Muzzle loading firearms or ammunition developing an ME > 4500J are being used on MoD ranges. A specific zeroing practice will also be required for those using ammunition with an ME > 4500J. In the event of an incident on military ranges involving a civilian shooter a joint MoD /NRA inquiry will take place and the club will be required to assist with the investigation.

d. Safe Place. A safe place is one in which the controls which are necessary to enable shooting to be conducted safely have been identified by a site-specific risk assessment and directed through the Range Standing Orders. All MoD ranges have site specific range standing orders which must be complied with at all times. MoD ranges are maintained by the range administering unit and are subject to regular inspections. The NRA RCO running the range for a civilian club must sign for the range on the MoD Form 906, thus certifying that he is qualified to conduct the shooting practice and that he has read and will comply with the range standing orders. An RCO (High Muzzle Energy) (HME) must annotate the MoD 906 if ammunition with an ME > 4500J is used.

3. The NRA and NSRA have produced guidance material on the Construction of Ranges and the Safe Management of Ranges for clubs which own their own ranges.

HIGH MUZZLE ENERGY PROCEDURES

1. The National Rifle Association (NRA) and MoD approved procedures must be used on MoD ranges when civilians are shooting with firearms where muzzle energy is greater than 4500 joules.
2. The shooter is to be authorised in writing by the Chairman of the appropriate club to fire the specific type of firearm using ammunition generating over 4500J muzzle energy. This will be satisfied by the Certification process that is to be fully implemented by 1 Jan 09.
3. For the Zeroing procedure outlined below, the RCO is to be qualified under the NRA RCO (High Muzzle Energy) (HME) course to conduct civilian shooting on ranges involving firearms and ammunition which generate muzzle energy in excess of 4500J. (Note: no firearm with a muzzle energy exceeding 7000J may be used on a MoD range).
 - a. The RCO (HME) is to record in the MoD Form 906, Land Range Log, when a firearm is being used which generates a muzzle energy of more than 4500J.
 - b. Only the issued NRA / MoD approved target is to be used at 200m or on the Bisley 25m zeroing range.
 - c. The target is to be attached such that the target centre line is set on the target screen centre line.
 - d. The shooter is to clarify to the RCO (HME) the rifle type and technique he is using.
 - e. A spotter must be appointed to observe the initial fall of shot until the initial strike on the target screen is identified:
 - (1) If the strike off the target screen is clearly identified the shooter may adjust and re-fire.
 - (2) If no strike is identified the shooter is to cease fire and report to the RCO who will not allow the shooter to continue until the weapon has been re-collimated or bore sighted to the RCO (HME)'s satisfaction.
 - f. Rounds on target may be adjusted but only the 5 final rounds are to be counted for the group, one of which may include the final adjusting round.
 - g. All 5 rounds of the final group must be within the box before the shooter may move to a different distance.
 - h. The butt marker is to identify clearly and mark those rounds which were used as sighting rounds and which are not to be included in the

qualifying group. To prevent any possibility of soft tissue damage from any light splashback the butt marker is to wear safety glasses in addition to hearing protection.

4. Guidance is provided on the NRA / MoD approved target for sight adjustment for different distances subject to achieving a successful group.
5. The zeroing procedure is to be carried out on each day the shooter wishes to shoot unless the zeroing is part of an official competition or training where firing is carried out on consecutive days.
6. After qualification the target is to be completed and signed by the shooter and the RCO (HME) and retained by the Club for 12 months.
7. Once zeroed using the procedure in paragraph 3 above, the shooter can shoot under the direction of a qualified NRA RCO who may or may not have the HME qualification.
8. HME procedures and practices for the Historic Breechloading Small Arms Association (HBSA) and the British Sporting Rifle Club (BSRC) are at Appendix 1.

Appendix:

1. HME Practices for the HBSA and BSRC.

**HIGH MUZZLE ENERGY PRACTICES FOR THE HISTORIC BREECHLOADING
SMALL ARMS ASSOCIATION AND THE BRITISH SPORTING RIFLE CLUB**

1. Both the Historic Breechloading Small Arms Association (HBSA and the British Sporting Rifle Club (BSRC) fire weapons which can develop in excess of 4500 joules.
2. The current approved High Muzzle Energy Practices (HMEP), which require zero at 200 metres with 600 metres set before going back up to 1200 metres, are impractical for the HBSA and BSRC practices.
3. When firing HMEP both HBSA and BSRC will zero at 100 metres on a standard BRSC target on the BSRC range at Bisley which the BSRC own on a long lease from the NRA (It is not MoD land). The zeroing must be conducted supported on sticks or from a bench limiting the QE at a height approved by the NRA.
4. Once zero is achieved the HBSA may then continue to fire on the BSRC range or fire at 200 metres only on either Short Siberia or Century Range.
5. The BSRC will continue to shoot on their range but may shoot at either 100 metres or 50 metres according to the practice to be fired. The BSRC may fire using a specific solid shot designed to achieve a single shot kill against big game as approved by the NRA.
6. The BSRC will complete a site specific risk assessment and produce a resultant set of Range Standing Orders which will also include all necessary controls imposed by the Bisley MoD and NRA Range Standing Orders.
7. The BSRC Range Standing Orders will apply to both BSRC and HBSA members and is to be signed off by the Chairmen of both clubs and endorsed by the NRA.
8. Only BSRC and HBSA qualified Range Conducting Officers (RCO) may conduct BSRC and HBSA practices above 4500 joules and an HBSA RCO must be present at all times to conduct any HBSA HMEP on Short Siberia or Century.

Club Agreement and Order Form

Club Name	Club affiliation no.

Club agreement for the use of MoD ranges

As Chairman of the club named above, I agree that:

- Our club will follow the NRA Safe Shooting System.
- I will annually certify all members who request to be certified and who I judge to be safe and competent.
- I will ensure that anyone shooting with the Club holds a valid certificate from a club affiliated to the NRA except in the case of Probationary members or those listed in Appendix 3 to the MoD agreement.
- Any new members to our club will complete the NRA probationary training course (either run by the NRA or by ourselves). If our club wants to use our own course, we will apply for accreditation by the NRA.
- I will maintain adequate records of our training and certification systems for possible audit by the NRA or MoD.
- I agree that our club will take part in any investigation conducted jointly by the NRA and the MoD following an incident on a MoD range and will require our members to assist fully in any such investigation.

Signature:

Name:

Date: