Disclosure Report

IR-01-26-36973 / IR-01-26-38105

FSA APPROVED PISTOL LIST (APL)

RELEASE DATE: 13/11/2026

Sporting Shooters Association of New Zealand Inc.

EXECUTIVE SUMMARY

Official Information Act (OIA) documents obtained on 6 November 2026 reveal that Firearm Safety and Education New Zealand (FSENZ)—continuing policy work initiated in June 2026 by the former Firearm Safety Authority (FSA)—is developing a mandatory national Approved Pistol List (APL) with input from Pistol New Zealand (PNZ). Framed around restricting non-statutory "Personal Defence Weapons" (PDWs) despite an absence of public safety risk analysis, the policy aims to establish a de facto ban on specific handguns without introducing new legislation.

Rather than reclassifying firearms through a formal Order in Council (OIC) under Section 376 of the Arms Act 2026—which requires Ministerial approval, public consultation, Cabinet sign-off, and Crown compensation—the Regulator intends to use Section 234(2)(c) to mandate the APL as a certification condition across all New Zealand pistol ranges. This approach creates circular legal logic: by barring unlisted pistols from every certified range, the Regulator can transfers to B endorsement holders on the grounds that those pistols are "unsuitable" for range use. Because this operational mechanism bypasses Section 346 compensation provisions, owners of currently lawful B-endorsed pistols excluded from the list may face the forced surrender or destruction of their property without compensation, while ranges face prohibitive District Court litigation costs to appeal renewal conditions.

Although an approval panel including PNZ and independent representatives will review models "on the papers," its recommendations will be non-binding, leaving the Regulator with unilateral veto power and exposing all handgun categories—including snub-nose revolvers and magnum calibre bans —to regulatory creep. This report and the response material outline how an identified faction within the Regulator will go about laying the foundations to enable further restrictions by misusing discretionary powers to produce results that were only ever intended to occur via Order in Council, a power the Regulator does not have.

INTRODUCTION

The Sporting Shooters Association of New Zealand (SSANZ) received information that an Approved Pistol List (APL) was being developed by Firearm Safety and Education New Zealand (FSENZ), with input from Pistol New Zealand (PNZ). Given that this was completely unheard of at the time, SSANZ submitted two OIA requests to FSENZ on **9 and 17 October 2026**.

On **6 November 2026**, SSANZ received the response, which has been included alongside this disclosure report. This report serves as SSANZ's interpretation of the information provided.

Nothing in this report should be relied upon as legal advice; it is for general information purposes only. If you would like to know how this impacts you or your pistol range, we encourage you to seek legal advice from lawyers who specialise in the Arms Act.

This report and the OIA response material are being shared to spread awareness of what is happening behind closed doors and to give individuals and groups access to the raw information, allowing you to independently form your own opinions and conclusions. We encourage you to share this information with your communities. If any pistol range operators are already being pressured to adopt the APL as a condition of their range certification, we encourage them to get in touch with SSANZ.

Collective awareness is collective defence.

KEY PARTIES IN OIA RESPONSE MATERIAL (NON-EXHAUSTIVE)

CCG POLICY PAPERS

Cynthia Van Ee – FSA

Peter Baird – FSA

Pistol New Zealand

New Zealand Police

EMAIL COMMUNICATIONS

Michael McIlraith – FSA

Peter Baird – FSA

Michael Tarttelin – FSA

John Herbert – FSA

Cynthia Van Ee – FSA

Deborah Lamb – Pistol New Zealand (President/CEO)

Peter Miles – Pistol New Zealand (Range Development Convenor)

Summary of CCG Papers

The first CCG paper justifies the APL as a way to combat ‘Personal Defence Weapons’ (PDWs)—a term the FSA has literally invented, with no technical or legal basis in New Zealand firearms law. In practice, these are firearms that meet the legal specifications of a ‘Small Semi-Automatic Pistol’, but whose suitability for certified pistol ranges the FSA refuses to recognise for political reasons.

Neither paper discusses any actual public safety risks posed by ‘PDW’ firearms, nor explains why they are a problem. All Small Semi-Automatic Pistols are already limited and regulated equally. Instead, the papers focus on how the FSA can block them from being placed on B endorsements—treating them as ‘loopholes’ despite the fact that they meet the exact legal definitions Police lobbied for after 2019.

The second paper outlines the FSA’s plan to create a legally binding national pistol list by embedding it into range standing orders via Section 234(2)(c) of the Arms Act. Currently, the only legal grounds to refuse a B endorsement for a pistol is to argue that it is unsuitable for use on a certified pistol range. By making range certification conditional on adopting the APL into standing orders, the regulator creates circular logic: a pistol can be denied a B endorsement simply because it isn’t on the APL. Even if a Small Semi-Automatic Pistol is objectively suitable for target shooting, FSA/FSENZ intend to define "suitability" purely by whether they have chosen to add it to the list.

This policy is designed to force the APL onto all pistol shooting ranges as a condition of certification, not just PNZ-affiliated clubs. While new pistol types would be reviewed with input from PNZ and select independent representatives, the approval panel's recommendations would not be binding—the Regulator would always retain the final say. Crucially, the APL would apply to all types of pistols, not just Small Semi-Automatic Pistols.

Notably, the second document contains a sizeable redaction under Section 9(2)(j) of the Official Information Act, which permits withholding information to “enable a Minister of the Crown or any public service agency or organisation holding the information to carry on, without prejudice or disadvantage, negotiations (including commercial and industrial negotiations).”

It is unsettling that so much time, funding, and manpower has been committed to banning lawful Small Semi-Automatic Pistols without a shred of public safety risk analysis. Neither policy paper demonstrates any need to restrict these firearms, nor explains why certain Small Semi-Automatic Pistols warrant tighter controls than others. Instead, the stated benefits focus entirely on giving bureaucrats greater control over what heavily regulated B-endorsement holders may own—reaching well beyond the statutory definition of a Small Semi-Automatic Pistol. This departure from the law is driven by no urgent public safety need, as all Small Semi-Automatic Pistols are already restricted and regulated identically. The push by a minority within the Regulator is rooted in politics, not public safety.

The Arms Act 2026 states that its purpose is to promote the safe possession and use of arms while imposing controls to prevent criminal possession. Yet there is no connection between the outcomes

proposed in the CCG papers and the statutory purpose of the Act. Ultimately, these policies arbitrarily restrict safe, lawful firearm use within an already heavily regulated community for no compelling reason.

Potential Legal Impacts

The APL highlights that Small Semi Automatic Pistols that are seen to be a ‘PDW’ can be on B endorsements

The intention of the APL is to allow the Regulator to redefine "suitability" by restricting ranges rather than debating pistol configurations. This strips licence holders of the ability to argue that a firearm is suitable for target shooting, simply because no range has been cleared to permit that specific model. The legal rationale is circular by design, rendering the process arbitrary and dictatorial.

Introducing the APL is a tacit admission by the FSA (now FSENZ) that legal arguments supporting the suitability of contentious Small Semi-Automatic Pistols carry weight—and that the Regulator fears it cannot block them under current law. This is proven by the fact that several of these contentious firearms are already lawfully held on B endorsements, having met both range suitability standards and the technical definitions in the Act. Their existing lawful ownership directly undermines the claim that they were never suitable for a B endorsement.

Despite assurances that the current roster of B-category pistols will be grandfathered in, we know this is a misrepresentation by certain proponents rather than a binding commitment from the Regulator itself. Firearms currently classed as Small Semi-Automatic Pistols face reclassification, turning the APL into a de facto Order in Council disguised as operational policy. Because this now amounts to the reclassification of existing pistols, we must examine the exact mechanism being used to achieve it.

Can the Chief Executive declare certain Small Semi-Automatic Pistols to be Restricted?

FSA/FSENZ appear to be constructing an equivalent to an Order in Council (OIC) to dictate which pistols can be held on B endorsements. Using Section 234(2)(c) as a ‘back-door’ OIC power to reclassify pistols via range certification conditions is a legally inappropriate—and overly optimistic—application of that provision when compared to Section 376 of the Arms Act. (As a side note, Section 375 would not apply, as the firearms being reclassified objectively meet the definition of Small Semi-Automatic Pistols; Section 376 is the provision designed to allow the reclassification of any pistol type via OIC.)

A comparison between the proposed APL mechanism and the formal Order in Council process for declaring a specific Small Semi-Automatic Pistol a Restricted Weapon is outlined below:

Section 234(2)(c)

The FSA/FSENZ intends to use the Chief Executives (formerly the Police Commissioner) powers to place conditions on every pistol range in the country as a condition of certification. With every pistol range governed by the same condition to only use firearms on the APL, this has achieved the

equivalent of forcing every pistol not on the APL to be considered a Restricted Weapon simply by decree of the Regulator. It is implied that the FSA/FSENZ see this as an ‘operational’ matter and therefore it would not require policy oversight from the Ministry of Justice, the responsible Minister, or consultation with impacted communities. The fact PNZ is being consulted is at the discretion of the FSA/FSENZ and is not a legal requirement.

Section 376 (and Section 378)

For a pistol to be classified as a Restricted Weapon via Order in Council, a completely different process takes place. It requires the responsible Minister to recommend to the Governor-General to declare the pistol to be a Restricted Weapon. Before making the recommendation, the Minister must be satisfied that the Secretary for Justice has consulted with:

1) The Chief Executive; and

2) The Commissioner of Police; and

3) Has done everything reasonable to consult with affected or likely to be affected communities unless the Minister is satisfied that due to the circumstances, consultation to a certain extent or at all was not practicable.

The Order in Council is signed off by Cabinet, presented to the House of Representatives by the Minister, can be disavowed by the House of Representatives, and is published as secondary legislation. Checks and balances are plentiful and the process heavily involves elected officials and democratic porcesses. It does not appear that any attempt has been made by FSENZ to take this route probably because it is unlikely that the current Government would entertain this idea.

Can Section 234(2)(c) replace Section 376?

This is a loaded question. It appears that certain individuals within FSA/FSENZ sought to shield this project under the cover of ‘operational policy’—an area where Ministers and their staff exercise very little control or oversight. Framing the initiative as operational policy also likely served to keep the Ministry of Justice out of the process, despite the significant legal impacts outlined above.

When Parliament drafted the Arms Act, its intent was unambiguous: firearms may only be declared restricted via an Order in Council, accompanied by compensation. Allowing the Chief Executive to achieve the exact same outcome through operational discretion—bypassing every statutory safeguard—is a gross misuse of the legislation. Section 234(2)(c) was clearly intended to let the Chief Executive impose reasonable conditions for the safe operation of individual ranges, not to institute a de facto, uncompensated national ban on specific pistols by forcing identical conditions onto every range in the country.

Confiscation and Destruction without Compensation – Section 346

Under Section 346 of the Arms Act, compensation for destroyed pistols reclassified as Restricted Weapons is strictly limited to those declared via an Order in Council. The Act does not recognise destruction resulting from a de facto recategorisation under Section 234(2)(c) as grounds for compensation. On FSENZ’s current trajectory, anyone holding a B-endorsed firearm that is

excluded from the APL will likely receive nothing should their firearm be destroyed as a result of this policy.

None of the OIA documentation highlights this risk, instead operating on the assumption that the existing roster of B-endorsed pistols will automatically form the basis of the APL. Yet several firearm models currently held on B endorsements could fall under the Regulator's non-technical, subjective label of a "PDW". Unless FSENZ formally guarantees that all existing B-endorsed pistols are grandfathered onto the APL, certain Small Semi-Automatic Pistols will face forced recategorisation once every range adopts the list—leaving owners who cant sell their firearms privately to surrender or destroy their property without Crown compensation.

Will this only impact Small Semi-Automatic Pistols? No

Whilst 'PDWs' are being used as a pretext to establish the APL and force the de facto reclassification of certain Small Semi-Automatic Pistols, the list itself can easily be expanded to target any other handgun. That includes snub-nose revolvers with barrels under 101mm or pistols chambered in magnum calibres. The risk of regulatory creep across the wider B-endorsement community is severe—and if the APL is treated purely as 'operational policy', that expansion would happen with zero MOJ oversight, Ministerial input, or public accountability.

How might this impact my pistol range?

Range certifications come up for renewal every five years. If the Regulator forces the APL onto your range as a condition of renewal, options to fight it are severely limited. The certifying entity would have to file an originating application in the District Court to appeal a condition imposed under Section 234(2)(c), pursuant to Section 352(1)(b)(ix). Because there is no internal appeal process within the Regulator, the prohibitive cost of District Court litigation will effectively price smaller ranges out of challenging this misuse of Section 234(2)(c). Ultimately, the sheer expense of fighting the APL is its strongest defence.

TIMELINE OF EVENTS

- CCG Paper "*Development of Approved Pistols for B endorsement holders*" published on **10 June 2026** by Cynthia Van Ee (FSA).

- On **7 August 2026** multiple emails between Peter Baird (FSA) and Deborah Lamb (PNZ) alongside Peter Miles (PNZ (Range Development Convenor), Cynthia Van Ee (FSA), and Michael Tartellin (FSA) occurred. Peter Baird wanted to discuss the list concept with Deborah Lamb (PNZ). Deborah queried the need to reinstate the approved pistol list. Peter highlighted the difficulty that firearms such as the Zenith MP5K clone were causing as they meet the definition of a pistol, as well as approvals relating to domestically manufactured pistols. He highlighted that there are statutory pathways under Section 38W(2)(c) of the Arms Act 1983 (equivalent to Section 234) to place restrictions on what firearms can be used on a pistol range. There was also mention of early discussion about the status of pistols with barrel lengths under 101mm. It was highlighted that there is an opportunity for PNZ to influence future pistol approvals, such as new models or pistols for newly emerged pistol disciplines.

- Deborah Lamb (PNZ) proposed to Peter Baird (FSA) and Peter Miles (PNZ (Range Development Convenor) on **10 August 2026** that instead of a list of approved pistols, an exclusion list be adopted.

- There are several internal FSA emails between **11 and 13 August 2026** covering the difficulties in constructing an Approved Pistol List from the existing databases due to incorrect or inconsistent data entry. Early discussions regarding how firearm owners and dealers would access the Approved Pistol List database also occurred.

- The policy documents and emails confirm that an initial meeting to discuss the APL concept occurred on **13 August 2026**. Deborah Lamb (PNZ) and Peter Baird (FSA) attended. There was subsequent email correspondence between the attendees referring to Sections 234(1) and (2)(c) which allow the Chief Executive to place restrictions on the types of firearms that can be used on a certain range.

- Email correspondence between Deborah Lamb (PNZ), Peter Miles (PNZ (Range Development Convenor), and Peter Baird (FSA) on **17** and **19 August 2026** covering the logistics of how the panel system will work. Peter Baird confirms that pistol approvals would be 'on the papers' so the panel is not required to test or physically access the pistol for inspection.

- On **21 August 2026**, Peter Baird (FSA) emails Ian Gladding (New Zealand Police National Armoury) to discuss their role in the proposed pistol approval process and ask several questions.

- On **27 August 2026**, Peter Baird (FSA) emails Douglas Brett (FSA), Michael Tartellin (FSA), Cynthia Van Ee (FSA), and John Herbert (FSA) regarding the implementation plan for the APL. There is reference to PNZ abiding by a Code of Practice or Memorandum of Understanding relating to this process.

- CCG Paper "*Development of an Approved Pistols [List(?)] for B endorsement holders*" published on **2 September 2026** by Peter Baird (FSA) and Cynthia Van Ee (FSA).

- **9 September 2026**, internal FSA correspondence confirming problems with the firearms dataset. Discussion from Peter Douglas (FSA) regarding initial engagements with PNZ who are viewed as the representatives of pistol target shooting. There are discussions about where 'modification' turns into 'manufacture' in the context of pistols.

- On **14 September 2026** Michael McIlraith (FSA) notes the importance of progressing the pistol list to Peter Baird (FSA). Staff have been assigned to reconcile the National Intelligence Application (NIA) pistol list. There is reference to 'Terms and Conditions' being advanced to Pistol New Zealand but no further details are provided.

- Meeting between Deborah Lamb (PNZ), Peter Baird (FSA), and Michael Tartellin (FSA) on **14 September 2026**. It is unclear what was discussed.

- Meeting between Deborah Lamb (PNZ), Peter Miles (PNZ (Range Development Convenor)), Peter Baird (FSA), Michael Tartellin (FSA), Cynthia Van Ee (FSA) plus FSA support staff on **16 September 2026**. What was covered in this meeting is unclear.

- On **23 September 2026** the new regulator commences operations, phasing out the Firearm Safety Authority and Firearm Safety and Education NZ inherits the pre-existing APL policy.

- Peter Baird (FSA) attended the Pistol New Zealand Annual Conference. The Conference occurred in Christchurch on **3 October 2026**. Peter Baird confirmed in his report back to senior FSA/FSENZ staff that evening that he had met the PNZ Committee to discuss the Approved Pistol List (APL). In Peter Baird's opinion, this process may require policy determination by the Chief Executive.

- On **5 October 2026**, Douglas Brett (FSA) stresses the importance of PNZ participation on the 'pre-regulator panel.'

- **9 October 2026**, SSANZ submits the first OIA request regarding the approved pistol list. The second request is sent on **17 October 2026**.

- **16 October 2026** and **21 October 2026**, internal FSA communications about finalising letters to go to PNZ and independent clubs as well PTP diagram for manufacturing pistols.

- OIA response received on **6 November 2026**.

Subjective Interpretations are the Problem

If certain factions within the Regulator were genuinely concerned about inconsistent staff decisions regarding Small Semi-Automatic Pistols, removing its subjective and political filter would deliver immediate consistency—at zero cost and with no new policy, panels, or databases required. Suitability does not need to be subjective yet the Regulator refuses to abandon subjectivity, manufacturing a problem it then uses as an excuse to expand its own powers to rival that of Ministers and Parliament. The APL is the ultimate example of this self-fulfilling prophecy: keeping legal definitions vague enough to manufacture friction, then using "solutions" as a cover for institutional empire-building and centralisation by a minority faction within the Regulator.

The CCG reports correctly note that the first three criteria in the legal definition of a Small Semi-Automatic Pistol are purely technical and easy to verify with a ruler, measuring tape, or chronograph. Why, then, does the CCG paper refuse to recommend an objective interpretation for the fourth and final criterion?

That final criterion is whether the firearm "is suitable for shooting on a pistol shooting range." By keeping "suitability" subjective, the Regulator preserves a politically expedient veto over which pistols it allows. In reality, establishing objectively measurable suitability criteria would provide certainty for the industry, ensure consistent enforcement of the law, and rebuild trust between the Regulator and law-abiding firearm licence holders. The APL does not achieve this, it simply protects the current subjective interpretation of suitability by entrenching it in layers of murky bureaucracy via approved lists and oppressive range certifications, to produce an end result that mimics the OIC power that the Regulator was never given.

Any criteria for suitability needs to be objective, transparent, apolitical, and consistently applied in good faith without politicisation.

Conclusion

This response is alarming, demonstrating that legacy FSA thinking is intruding into FSENZ via the aforementioned cluster of staff who transitioned across. Policy planning for this project clearly

predates FSENZ and was simply inherited by the new organisation. Furthermore, it is impossible to know everything discussed in meetings between FSA/FSENZ and PNZ—and there is no guarantee that the OIA release is exhaustive or that further discussions have not taken place since. We remain deeply concerned by this excessive, inappropriate reliance on range certification provisions to ban Small Semi-Automatic Pistols—lawful B-category firearms that are entirely suitable for pistol range use. We hope this report spurs constructive discussions about the APL.

Anyone with additional information is encouraged to contact us at president@sportingshooters.nz.

Kind regards

The Committee