



# The Clay Target Shooting Association of South Africa

P.O. Box 812 Great Brak River 6525 South Africa  
Tel: +27(0)44 620 4178 E-mail: [info@ctsasa.co.za](mailto:info@ctsasa.co.za) Web: [www.ctsasa.co.za](http://www.ctsasa.co.za)

South African Police Service Accredited Sports Shooting Organisation  
(For the Firearms Control Act 60 of 2000): Certificate Number (FAR) 1300022

Registered Non-Profit Organisation. Registration No. 055-318-NPO

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28<sup>th</sup> July 2021

Mr A Rapea  
Secretary of Police

PER EMAIL: [Bilkis.omar@csp.gov.za](mailto:Bilkis.omar@csp.gov.za)

PER EMAIL: [Phumudzo.rapea@csp.gov.za](mailto:Phumudzo.rapea@csp.gov.za)

Dear Sir

**RE: COMMENTS ON THE FIREARMS CONTROL AMENDMENT BILL 21 MAY 2021**

1. The Clay Target Shooting Association of South Africa (“CTSASA”) is an accredited association accredited with the South African Police Services as a sport shooting organisation, accreditation number 1300022.
2. It is also a registered non-profit organisation.
3. CTSASA is the primary representative of clay target shooting in South Africa and is a member of the international controlling body for clay target shooting based in France known as FITASC. This stands for Fédération Internationale de Tir aux Armes Sportives de Chasse or International Shooting Federation of Hunting Sport Weapons.
4. FITASC is an internationally recognised governing body for six clay target shooting disciplines. The CTSASA is affiliated with FITASC for three disciplines namely Sporting, Universal Trench and Trap1.

5. In its capacity as an umbrella body, FITASC regulates the manner in which their clay shooting disciplines are conducted throughout the world to ensure uniformity and consistency in competitions, qualifications for National colours. FITASC organises continental and international championships, including European Championships and World Championships.
6. Clay Target Shooting is also a recognised Olympic discipline. The CTSASA is affiliated to the South African Shooting Sport Confederation, which is in turn affiliated to the ISSF (International Sport Shooting Federation). The ISSF is the body which regulates all the Olympic shooting disciplines - shotgun, rifle and pistol.
7. All competitions under the umbrella of CTSASA take place on National Regulator for Compulsory Standards and SAPS accredited shooting ranges.
8. South Africa has a proud history of both international participation in competitions and the hosting of international competitions.
9. The 2021 calendar for CTSASA is attached as Annexure “A” to demonstrate that its activities are spread throughout the year and involves various disciplines.
10. International clay target shooting in South Africa includes competitors from Britain, Belgium, Hungary, Zimbabwe, Singapore, France, Germany, Czechoslovakia, USA, Botswana, Zambia, Poland and other countries.
11. Clay target shooting is divided into various disciplines.
12. These disciplines are:
  - 11.1 Down the Line Trap known as DTL Trap,
  - 11.2 ATA trap, ATA Trap Doubles
  - 11.3 NSSA skeet; NSSA Skeet Doubles
  - 11.4 FITASC Universal Trench;
  - 11.5 FITASC TRAP1
  - 11.6 FITASC Sporting
  - 11.7 English Sporting

### 11.8 Olympic Trap, Olympic Skeet, Olympic Double-Trap

13. Each one of these disciplines requires a different type of firearm.
14. A skeet shotgun normally has 26 inch barrels and open chokes and can only be practically used for skeet shooting because of these design constraints.
15. A sporting shotgun typically can have up to 32 inch barrels and is multi-choked. This means it can be changed or reconfigured for different type of competitions. This type of barrel length will be completely inappropriate to skeet shooting because it is designed to shoot different types of clay targets to skeet shooting. A skeet range has a set menu of clay targets at set distances from set positions.
16. A trap shotgun often has a raised rib on the barrel to assist the shooter in target acquisition for going away targets which are specifically designed around the parameters set for trap ranges.
17. Sporting shooting contains an infinite potential variety of targets for clay targets to be sent towards or away from the shooter to the left or the right, up or down in combinations of one or two.
18. It is typical for a competitive clay target shooter to be awarded colours in more than one discipline.
19. A recent example is that of Andrew Marc Ager, who has been awarded veteran colours to represent South Africa in FITASC Sporting and in one Compak discipline. Compak is a smaller organisation than CTSASA that governs one clay target shooting discipline in South Africa and is unrelated to CTSASA.
20. A list of European and World Champions is attached as Annexure **“B”** to this representation.
21. A list of members is also attached as Annexure **“C”**. Although the membership of CTSASA hovers at around 900, it must be borne in mind that the vast majority of these members are actively involved in some form of competitive shooting. It is significant

that there is a junior component which is an essential component of feeding new entrants into clay target shooting.

22. We also attach as Annexure “D” a list of persons who have shot 100 straight clay targets without a single miss.
23. This is regarded worldwide as an incredibly difficult achievement.
24. We also attach as Annexure “E” its current list of National team members and Protea colours and special awards made to CTSASA members.
25. In addition to international teams and international achievements, we also have highly prestigious achievements in provincial championships, most notably our annual Chairman's Cup. This is our inter-provincial championship where teams of 12 competitors each shoot 150 targets over two days. To view the hugely successful 2020 Chairman's Cup, please click [HERE](#). Our provincial teams include members from various categories, including young shooters and ladies. We also have highly skilled Indian and Black shooters, notably Gillian Maistry and Ashley Tshishonga. We are intensely proud of our ability to attract competitors and members from all different backgrounds.
26. The CTSASA also offers members the opportunity to become qualified Umpires and Coaches. We currently have a National Coaching Program which is training and qualifying members to become coaches within their own clubs. This includes Sam Tshishonga who has already qualified as a FITASC Sporting Club Coach. Please click [HERE](#) to view the full list.
27. Our commitment to providing a highly enjoyable, safe and rewarding sport to everyone who wishes to join us demonstrates our ability to use firearms for a lawful purpose in a safe environment. Our commitment to the responsible use of firearms creates a safer and more responsible society because individuals learn greater responsibility through the legitimate handling and use of firearms.

28. Clay target shooting, it must be emphasised, has its own specific requirements that are internationally regulated. These relate to the type of shotguns required for different disciplines (which requires multiple shotgun ownership) and the quantities of ammunition needed.
29. A Clay target competition typically consists of either 100 or 200 targets. A competitor needs at least 150 rounds of ammunition per 100 target competition because of potential misses or re-shoots as a result of clay breakages or as allowed for in the rules. Some disciplines allow two shots at a single target.
30. A competitive shooter can shoot two, sometimes three, 100 target competitions a day over a three day period i.e. 600 competitive targets which would require approximately 900 rounds of ammunition.
31. Furthermore, international competitors cannot travel with ammunition because it is too heavy and have to source ammunition locally for competitive use. There is no provision in the proposed amendments to accommodate foreign shooters who will need similar quantities of ammunition to those required by local shooters.
32. CTSASA is also a member of CHASA which is an accredited hunting association. Many of CTSASA's members are wingshooters and require large amounts of ammunition in excess of 100 rounds to engage in wingshooting. A three clay wingshot can require in excess of 500 rounds of ammunition.
33. CTSASA is also aware that there are a large number of foreign visitors who come to South Africa not only to engage in clay target shooting competitions, but also to engage in wingshooting. This requires large amounts of ammunition which is not accommodated by the proposed Amendment Bill.
34. In addition to the above comments on ammunition, a large percentage of Clay Target Shooters also reload their shotgun ammunition in order to save on costs. The complete deletion of Section 93 of the Act that deals with reloading will severely and adversely affect our sport and members.

35. CTSASA's specific objections to the Bill are as follows:
36. The CTSASA **rejects outright** all of the proposed amendments in the Firearms Control Amendment Bill 2021 (FCAB).
37. We **do not consent** to any of the proposals contained in the FCAB. The reasons for this are as follows:-
  - 33.1 The proposed amendments are irrational, illogical and devoid of any benefit to society in general, to law-abiding firearm owners or for the shooting sports in particular.
  - 33.2 The proposed amendments are not rationally connected to anything beyond ensuring that the current failing system in place at the Central Firearms Registry is further overburdened to the point of complete collapse.
  - 33.3 The proposed amendments are discriminatory and destructive in many respects but particularly so for the shooting sports and legitimate hunting.
  - 33.4 The proposed amendments will severely curtail South Africa's ability to participate in World Championships, World Cups, European Championships, Commonwealth Games and the Olympic Games. Depriving our members of these opportunities is not going to contribute to a safer society and will simply destroy a vibrant, legal and safe sport.
  - 33.5 There is zero evidence that any of the proposed amendments will do anything other than remove the rights of citizens to practice sport, earn a living, defend their lives and use firearms in lawful pursuit of the legitimate uses of firearms.
  - 33.6 There has been zero consultation with any of the shooting sport organisations.
  - 33.7 The Bill does not in any way explain how it will remove firearms from illegal hands.

## **SOCIO ECONOMIC IMPACT ASSESSMENT**

38. The Socio Economic Impact Assessment that is attached to the Bill is extremely facile, outdated and was drafted before the amendments were finalised.
39. There is no comment in the Socio Economic Impact Assessment on the impact on sport shooting and sport shooting clubs.
40. Clay target shooting can only take place on an accredited shooting range. That accredited shooting range is accredited with the National Regulator for Compulsory Standards and the South African Police Services.
41. In many instances, clay target shooting ranges are owner operated and the owners have invested substantial sums of money in purchasing adequate ground for clay target shooting and developing it. Valley Clay Target Club is one such example in the Western Cape and Wattlespring Gun Club in Gauteng is another. Wattlespring has invested in excess of Forty Million Rand in its facilities, and is a foreign Dubai based investment.
42. Clay target ranges will be forced to close down if the amendment is passed in its current form resulting in job losses and economic losses to the owners of clay target shooting ranges.

## **CONCLUSION AND RECOMMENDATIONS**

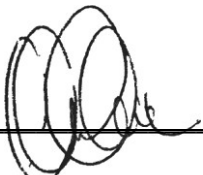
43. We reject outright all of the proposed amendments to the Firearms Control Act 60 of 2000 (as amended) as detailed in the Firearms Control Amendment Bill of 2021.
44. The objections listed above are not the full list of objections but are the key areas which affect the sport shooting associations in general and the Clay Target Shooting Association of South Africa in particular.
45. We reject the proposal to remove the right to apply for a firearm for self-defence.

46. Our counter-proposals for amendments to the Firearms Control Act 60 of 2000 (as amended) are as follows:
- a) **Licence the person, register the firearm.** This has always been a key proposal by the firearms community and yet it has been consistently ignored. By implementing this system it will alleviate a massive bureaucratic burden from the Dedicated Firearms Officers and the Central Firearms Registry. It would simplify the process of licencing and significantly reduce the costs to the CFR.
  - b) **No limitations on number of firearm licences.** Limiting the number of firearms for a licenced person is of no benefit to society and does not reduce the levels of crimes involving firearms. *Licence the PERSON, register the firearm.*
  - c) **No limitation on period of validity for licence.** Licenced firearm owners do not suddenly become 'incompetent' nor irresponsible. Relicensing is an administrative burden that serves no useful purpose. The CFR is currently unable to manage the system of relicensing. The introduction of more burdensome laws/regulations will only cause a great collapse of the system.
  - d) **Electronic and online filing of applications/renewals.** The current system of manual paperwork is archaic, time-consuming, inefficient and very expensive. It's time to change.
  - e) **Return to immediate issuing of Temporary Export/Import Permits for South African licence holders for international/regional travel at local police stations.** When an existing firearm licence holder wishes to travel overseas to participate in competition shooting it should be automatic to provide a Temporary Export/Import Permit. The responsibility rests with the licence holder to ensure permission is granted in the destination country. Confirmation of competition participation is all that should be required in order to substantiate the need for the SA permit.
  - f) **Automatic right to inherit firearms.** Firearms are very often of sentimental value as well as of a high financial value. There should be no impediment to inheriting firearms, provided that the person inheriting the firearms is a licenced person.




- g) **Remove the need for certified Dedicated Membership Certificates.** This is an administrative burden that serves no beneficial purpose. A Dedicated Membership Certificate signed by the Responsible Person of the accredited organisation is sufficient.
- h) **Remove all restrictions on ammunition and transportation of firearms.**
- i. There should be zero restrictions on the amount of ammunition in the possession of a licenced firearm owner, irrespective of the category of the licenced firearm owner.
  - ii. A licenced firearm owner should be able to transport firearms on behalf of another licenced firearm owner.

47. In final conclusion, the proposed amendments have been compiled without consultation with the shooting sports and without any due consideration for the needs of the shooting sports. It is clear that the proposed amendments would, in effect, destroy the shooting sports. We therefore repeat our outright rejection of all of the proposed amendments.



**CTSASA President : Orazio Cremona**



**CTSASA Executive Officer : Sarah Kalell**

**Signed on behalf of The Clay Target Shooting Association of South Africa  
Accredited Sport Shooting Organisation: 1300022**

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**Patron :** Judge J J F Hefer    **President :** Orazio Cremona    **Vice President :** André Nagel    **Executive Officer :** Sarah Kalell

**Affiliated to:**

South African Shooting Sport Confederation (S.A.S.S.Co.)    South African Gunowners Association (S.A.G.A.)  
Fédération Internationale de Tir aux Armes Sportives de Chasse (F.I.T.A.S.C.)  
International Shooting Sport Federation (I.S.S.F.) (via SASSF)    International Clay Target Shooting Federation (I.C.T.S.F.)  
Confederation of Hunters Associations of South Africa (C.H.A.S.A.)

