

Chairperson Jonathan Fouché  
(012) 654-3346

Secretary Jill Howard  
Tel (011) 680-7223  
Fax 088 011 680 7223  
e-mail [saada@mweb.co.za](mailto:saada@mweb.co.za)



P O Box 90756  
BERTSHAM  
2013

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## What must be included on the SAP350 forms?

SAAADA has received various messages like the following email sent from the official ArmsControl1 email address to one of our members:

Please note that the email Arms Control 1 is designated only for 350A submissions which is dealer to dealer.

Individual to dealer must be completed on a SAPS 534, and 534 must be handed in at the local DFO as we do not receive and process them via emails.

Dealer to individual is submitted via a saps271

Regards,  
Arms control CFR

Section 39 of the Regulations clearly states:

- 1) A dealer who is exempted from the duties referred to in section 39(6) of the Act must, within seven days after the end of every week, submit to the Office of the Central Firearms Register a return on the form determined by the Registrar, or a computer printout which reflects the information of the prescribed form, regarding **all** firearms and ammunition –
  - (a) acquired during the relevant week; and
  - (b) transferred during the relevant week.

My emphasis of the word “all” above.

Dealers do not submit information on ammunition because such information is not included / required by the SAP 350 forms. In a similar vein, the SAP 350 forms do not indicate any restriction to only dealer to dealer transfers.

By issuing such unofficial instructions, it is again clear that SAPS CFR is acting *ultra vires* and making up law as they please.

In order to comply with the actual legislation, dealers are advised to include all firearms received (from whatever source) on their SAP 350(a) returns and all firearms disposed of or transferred out of stock (to whatever recipient) on their SAP 350(b) returns.

It is important to reflect the actual date of the physical receipt of the firearm, and dispatch / collection of the firearm, since the included period – from receipt to dispatch – is when the dealer is responsible for the firearm. As dealers well know, many weeks, if not many months, frequently pass between the physical movement of a firearm and what CFR's records reflect – I'll just mention the SAP350 Fiasco on the receiving end and the ridiculous "printing delays" following license approval to license collection from the DFO.

Protect yourself and ensure that the official record reflects reality, both in your register and on your dealer returns. Remember to keep copies of all submissions to SAPS!

Regards,

Jonathan