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Submission on behalf of the Firearms Trade

The records of the SAPS Central Firearms Register show that there are some 800 entities in South Africa that are licensed to trade in firearms and/or ammunition (in one form or another).

The South African Arms and Ammunition Dealers' Association, SAAADA, represents licensed firearm dealers (retail sector), importers and wholesalers (wholesale sector), specialist couriers / shippers (transport sector), manufacturers of firearms, ammunition and accessories (manufacturing sector) and gunsmiths (repair and maintenance sector), collectively referred to as the Trade. Our members are nationwide, serving the entire country. Some are national franchises, most are small, local businesses. Many offer secure storage of firearms, including the safekeeping of estate firearms (storage sector).

The various businesses that comprise our membership, serve and support various customers including:

- Private individuals, including hunters.
- Farmers, including those farmers supplying domesticated meat (essential service) and game meat (Level 4).
- SAN Parks, game ranchers and other wildlife management / anti-poaching initiatives (essential service).
- Private security companies (essential service), including cash-in-transit specialists (essential service).
- The various Metro Police and municipalities (essential service).
- National Key Points' security divisions.
- The South African Police Service (essential service).
- Export customers.

Most of the retail businesses within our membership have low-volume customer interactions. Customer interactions all take place within secure and controlled premises (as required by the Firearms Control Act). This makes it easy to control numbers and support social distancing, to maintain good hygiene practices such as mandatory wearing of masks, and proper sanitation such as hand sanitizer, clearing of surfaces, etc. Existing access-control makes it easy to temperature-screen staff and patrons. These aspects would be included in our approved Covid-19 safety plan.

The firearms Trade is a significant employer and contributes substantially to the fiscus via VAT, import duties and *ad-valorum* taxes, PAYE and corporate tax. Selling many high-ticket items, the Trade contributes to the fiscus beyond the norm for other similar sized businesses, yet with far fewer customer interactions, and all within highly controlled environments.

We note that "Licensing, permitting ..." is included in public administration activities at Level 4 and understand that this includes applications for firearm licenses submitted by our clients to the SAPS, thus

implicitly supporting the importance of our activities. Most firearm dealers (retail stores) also sell clothing and footwear as part of their offering (permitted under Level 3).

We request that the firearms Trade is permitted to partially recommence operations at level 4, and for all our customers at Level 3 of the Covid-19 Risk-Adjusted Strategy, by including the following points (in green text) in the relevant sections as indicated.

Level 4

Level 4's **A. Agriculture, hunting, forestry and fishing** includes provision for "... hunting, ... and related services", thus including the hunting, game farming and culling. These entities include professional hunters, professional cullers, farmers and recreational hunters securing meat for their families. All require support from specialist retailers – gun stores – to be able to undertake these activities successfully.

Level 4's **C. Manufacturing** includes provision for "all manufacturing up to 20% personnel", thus including the manufacture of firearms and ammunition. These manufacturers require raw material and components, as well as equipment and spare parts from importers, wholesalers (and other manufacturers).

E. Wholesale and retail trade, covering stores, spaza shops, eCommerce and informal traders

- Firearms, ammunition, components, accessories and related equipment required by any entity engaged in the provision of essential services, or any entity engaged in hunting, or any entity engaged in the manufacture of firearms or ammunition;

Level 3 (and all lower levels)

C. Manufacturing

- Manufacturing of firearms and ammunition, including components and related accessories, scaling up in phases to 100% employment;

E. Wholesale and retail trade, covering stores, spaza shops, eCommerce and informal traders

- Firearms, ammunition, components, accessories and related equipment for sale to the general public;

J. Transport, storage and communication services

- Transport and logistics in respect of firearms and ammunition, which shall include all components, accessories and related equipment;

L. Repair and related emergency services

- Repair of firearms and related equipment, which shall include all components, accessories and related parts;

M. Supply chains

- Production, manufacturing, supply, logistics, transport, delivery, critical maintenance and repair in relation to firearms and ammunition, including components and related equipment;

P. Health, social and personal services

- Firearms training and shooting practice for personal protection or to support hunting activities, including the use of outdoor shooting ranges and/or well-ventilated indoor shooting ranges subject to level-specific personal movement restrictions;

I would be please to meet with you to discuss this proposal, to clarify any issues you might have.

Kind regards,



Jonathan Fouché
Chairman