19

BRUCE RIFLE CLUB (INC)

ALL CORRESPONDENCE TO THE SECRETARY

Formed 1864
In recess 1924
Reactivated 1967
Incorporated 1975

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DATE: 11DEC2011

The Chief Executive Officer
Dunedin City Council
P O Box 5045
DUNEDIN

Dear Sir,

DUNEDIN CITY COUNCIL PLAN CHANGE 13
This is in lieu of **SUBMISSION FORM 5,** cited under Clause 6 of the First Schedule of the Resource Management Act 1991, as being the prescribed form for making submission on publicly notified proposed **District Plan Change 13 – Hazardous Substances**

We **do** wish to be heard in support of this submission.
We would consider presenting a joint case with like-minded others at a hearing.

Specific provisions of Proposed District Plan Change 13 to which our submission relates are:

Table 17.1 Explosives, p 17:38

Our submission is that:

Introduction

The Bruce Rifle Club was formed in the 1860s, being part of the militia of the period. It has since evolved into a competitive target rifle shooting club with some 40 members living mainly in greater Dunedin, with some a far afield as Invercargill and Christchurch It holds fortnightly shoots at its range at Narrowdale, near Milton.
Comments will be strictly limited to class 1 hazardous substances, in particular, to those of class 1.1D, 1.3C and 1.4S.

- **The club supports** the provisions in **Table 17.1, dealing with goods of class 1.3C, namely smokeless ammunition reloading powder in Group 1 zones.** Club support arises because this is in accord with the provisions of Regulation 23 of the Hazardous Substances (Class 1 to 5 Controls) Amendment Regulations 2003 (SR 2003/177)(SR 2001/116).

The club has no objection to what is proposed for Group 2 zones, nor for Groups 3, 4, 5 and 7 zones but is surprised at the "No threshold" proposed for Group 6 zones.

- **Objections, of which there are two:**

1. The club objects to **Table 17.1 page 17:38 where it deals with goods of class 1.1D ("Gunpowder and blackpowder").** It notes that its hazard was clearly considered by the Hazardous Substances and New Organisms Act (1996) and subsequent Regulations, being derived from nationwide consultation held in January 2001 before publishing the

Regulations later in 2001.

Accordingly, the club objection to this quantity, 5 kg, as proposed by Plan Change 13, is because it is only a third of what is allowed under Regulation 23 of the Hazardous Substances (Class 1 to 5 Controls) Amendment Regulations 2003 (SR 2003/177)(SR 2001/116).
The club notes that gunpowder is required in larger quantities per shot that smokeless propellants are, by the respective users users, leading to greater powder quantity requirements for competition shoots, which this club has hosted.

2 The club also **objects** to **Table 17.1 page 17:38** as it deals with **goods of class 1.4S**, "safety ammunition".

Our reason for objecting to this part of the proposed Plan Change 13, is because it is only 40% of what is allowed under Regulation 23 of the Hazardous Substances (Class 1 to 5 Controls) Amendment Regulations 2003 (SR 2003/177)(p. 125)(SR 2001/116).
It is appreciated that the quantity allowed is an increase on what is currently permitted (when taken in conjunction with that for class 1.3C explosives), but in support of our observation, the club would respectfully point to the following reference which is attached to the rear of this submission as an appendix:

- SAAMI (und, but circa 2000), *Small Arms Ammunition – Properties & Recommendations for Storage and Handling.* Small Arms Ammunition Manufacturers' Institute, Newtown, CT, USA.

This reference indicates that safety cartridges, commonly known as small arms ammunition, being items of hazard class 1.4S, have long been recognised as a product which will NOT mass explode, is NOT super-sensitive, and when exposed to fire, does not produce fragments beyond a maximum of 15 m (50 feet), these being of such small size as to be contained by cardboard cartons, as Hatcher (1962)(pp 539, 540) attests.

The quantity suggested by proposed Plan Change 13 perhaps coincidentally matches the quantity allowed on "passenger service vehicles". surely transportation is a more hazardous undertaking than mere storage of an already-designated "safe" good?

Closer exploration of some other territorial local authorities for their controls on hazardous goods reveals the following:

Central Otago District: mentions levels as set by previous legislation and refers to current HSNO limits for further reference (email from Felicity Couper of 08DEC2011 refers).

Clutha District: all class 1 goods are at levels set by HSNO Act (1996) and Regulations, (telecon Forsyth/Brass of 1630/05DEC2011.)

Waitaki District:…to be advised.

Queenstown Lakes District: advises that HSNO levels prevail (email of 08DEC2011 from Keri Harrison).

Other territorial local authority areas contacted stated the worked from the following provisions:
Christchurch City Council: all class 1 goods for residential areas are at levels set by HSNO Act (1996) and Regulations (telecom Forsyth/Osmers of 1010/05DEC2011).

New Plymouth District Council: all class 1 goods are at levels set by HSNO Act (1996) and Regulations.

Wellington City Council: all class 1 goods are at levels set by HSNO Act (1996) and Regulations.

We seek the following decision from the Council

- In connection with club **support for the provisions in Table 17.1 as it deals with goods of class 1.3C,** namely smokeless ammunition reloading powder in Group 1 zones, we would like the **Council to retain the measures as proposed** by District Plan Change 13.
- In connection with the club **objection to Table 17.1 page 17:38 as it deals with goods of class 1.1D ("Gunpowder and blackpowder"),** the club would like the **Council to change the quantity lawfully able to be held by residents in Group 1 zones from 5 kg to 15 kg** in accord with the HSNO Regulations (2003).
- In connection with the club **objection to Table 17.1 page 17:38 as it deals with goods of class 1.4S ("safety ammunition"),** the club would like the **Council to change the quantity lawfully able to be held by residents in Group 1 zones from 15 kg to 25 kg** in accord with the HSNO Regulations (2003).

Yours faithfully,

C I H Forsyth
Secretary
Bruce Rifle Club (Incorporated)

11DEC2011

DCC PC #13

19

SAAMI

SPORTING ARMS AND AMMUNITION MANUFACTURERS' INSTITUTE, INC.
SINCE 1926

SMALL ARMS AMMUNITION

Properties & Recommendations for Storage & Handling

11 Mile Hill Road, Newtown, CT 06470-2359

This leaflet has been prepared by the Sporting Arms and Ammunition Manufacturers' Institute, based upon information currently available to it. It is furnished to interested persons as a courtesy and in the interests of safety. It is not intended to be comprehensive; it does not modify or replace safety suggestions, standards, or regulations made by designated authorities, public or private. It is subject to revisions as additional knowledge and experience are gained. SAAMI expressly disclaims any warranty, obligation, or liability whatsoever in connection with the information contained herein or its use.

These paragraphs are meant to give everyone concerned for the shipment, storage and handling of small arms ammunition certain basic and important facts about the properties of this widely distributed product. Such information should dispel some of the rumors and tales which persist regarding ammunition bulk safety. It also outlines recommended storage conditions, and reports the reactions of ammunition when exposed to fire or intense heat and rough or vigorous handling.

These statements and recommendations do not supersede local, state or federal regulations. Local authorities should be consulted regarding regulations on the storage, transportation, sale and handling of sporting ammunition in each specific community.

Properties of Small Arms Ammunition

All ammunition is carefully engineered and manufactured as an article of commerce. It has a specific use; if stored in a proper manner and used as intended in firearms in good condition and designed for the specific cartridge, the safety and satisfaction of the shooter should be assured.

Small arms ammunition is packed in cartons and cases as specified by the US Department of Transportation. These container designs were developed in the interest of safety in transportation, storage and marketing. Therefore, unapproved packaging should never be substituted.

Specific properties or characteristics of small arms ammunition of particular interest to shippers, warehouse operators, dealers and users are as follows:

- Stocks of small arms ammunition will NOT mass explode. That is to say, if one cartridge or shotshell in a carton or case is caused to fire, it will not cause other adjacent cartridges or shotshells or their packages to explode sympathetically or in a simultaneous manner. There are no limits imposed on packaged quantities of ammunition which may be shipped, warehoused or displayed in commercial establishments.

This fact recognizes the inherently safe, non-hazardous characteristics of such ammunition in public or private storage.

- Small arms ammunition is not a super-sensitive item. Packages of ammunition may be dropped from any height which the packages will physically withstand, and cartridges or shotshells therein will not fire due to the shock. Properly packaged small arms ammunition will withstand all the rough handling tests of commerce such as drop test, vibration tests, and rotating drum tests without individual cartridges or shotshells firing.

- Small arms ammunition, if discharged in the open without the support provided by a firearm's chamber or other close confinement, discharges inefficiently. The flights — more accurately "movement" — of projectiles or debris particles from such incidents are extremely limited in velocity, range and energy. The small primer cups or rimfire case fragments are the missiles of highest velocity in such occurrences. Specifically, bullets and shot charges, being heavier than shell or cartridge cases in most instances, are rarely projected away from the location at which the unchambered round of ammunition was caused to ignite and discharge. However, small particles of metal or plastic from the burst case and primer cups may be propelled for short distances (usually not over 50 feet) at velocities sufficient in some instances to cause injury or discomfort.

Insofar as the Sporting Arms and Ammunition Manufacturers' Institute has been able to determine, there have been no substantiated reports of serious or fatal injuries caused by the discharge of packaged or loose ammunition in handling or in fires, regardless of the quantity or type of cartridges or shotshells involved. SAAMI has no verified report of any fire fighter hurt by flying bullets or shot pellets in fires involving a sportsman's in-the-home personal supply of ammunition, a retail sporting goods store's stock, wholesaler's or distributor's sizable inventory, or an in-transit cargo of this product.

Handling and Storage of Ammunition

Small arms ammunition contains explosive ingredients: A percussion-sensitive primer mixture and a smokeless propellant. It should be treated with respect and care in all handling, transportation and storage.

Ammunition should be stored in the factory carton or package. The labeling and identification on the original container help to assure that future use will be in the gun for which the ammunition is intended.

Ammunition stored in the home, retail outlet or distributor's warehouse over extended periods in factory packaging, subject to the ordinary variations of temperature and humidity ranging from tropic to Arctic conditions, can be expected to perform satisfactorily and safely in the firearms for which it was intended if such firearms are in proper working order and condition. Extreme high temperatures (over 150° F) however, should be avoided.

Ammunition should not be immersed in water or exposed to any organic solvent, paint thinner, petroleum product, ammonia, etc. Such materials may penetrate a loaded round and reach the powder or primer; a deteriorating effect will result which may cause misfires or squib shots. The latter can result in a projectile's lodging in a gun barrel, the obstruction possibly causing serious damage or injury when another shot is fired.

Ideally, home storage of small arms ammunition is in a locked closet or cabinet out of the reach of children and uninformed or incompetent persons. Both guns and ammunition should be stored out of sight and reach of children and others not physically or mentally capable of giving them correct, proper use and respect.

Storing guns and ammunition in locked auto trunks may be convenient, or required by state or local law, during short periods when moving to and from the hunting field or target range. The possibilities of extremely high temperatures make it sensible to remove firearms and ammunition from vehicles following the trip. The passenger compartment of a closed car when exposed to the sun often develops an extreme high temperature and is thus not a desirable spot to leave ammunition.

While blank cartridges will not mass detonate if one in a box is caused to fire, the noise of firing outside a gun will be nearly as loud as in normal use and may be harmful to hearing.The blank's "explosion" may also be rather violent due to rapidly expanding gasses released during burning. Obviously, blank cartridges deserve the same respectful handling and careful storage as other ammunition.

Retail and wholesale stocks of ammunition, not required for display, should be stored in original outer cartons or boxes exactly as supplied by the factory. When placed on basement or warehouse floors subject to moisture it would be well to stack the cartons on pallets. In some locations police or public security regulations may prescribe the manner in which small arms ammunition stocks are displayed and the quantity that may be in sight. Check with local authorities. Packages of ammunition should not be placed in proximity to heavily trafficked aisles in the reach of children.

Small Arms Ammunition in a Fire

Although much has been written and rumored about the 4th-of-July characteristics and so-called havoc of ammunition in fires, it just isn't so. Members of fire fighting units are understandably uneasy when confronted by fires where ammunition is involved.

Several members of the Sporting Arms and Ammunition Manufacturers' Institute have undertaken extensive experiments to show what can be expected when ammunition is involved in a fire. These companies have also made careful investigations after such fires, which show that the missiles do not have sufficient energy to penetrate the garments and protective gear worn by fire fighters.

Tests also show that the whizzing sound heard in the vicinity of ammunition fires are caused by primers expelled from the burning cartridges. The "pops" and "bangs" are exploding primers; the propellant powders burn inefficiently and make little noise.

Metallic cartridges in a fire are difficult to sustain in a burning condition once the packing materials have been consumed due to the cooling effects of the metal parts and the relatively high ratio of metal weight to smokeless powder. Only a vigorous fire around metallic ammunition stocks will cause all cartridges to burn. Shotshell ammunition is difficult to ignite, but once ignited it will sustain its own burning due to the plastic or paper tubes (hulls).

Disposal of Unservicable Ammunition

Ammunition that has been in a structural fire, and has become wetted or scorched, or has been exposed to flood waters should never be returned to commercial sales channels or sold at salvage sales, since it could be rendered dangerous to the shooter by such exposure. It should be scrapped.

Never dispose of ammunition by burying it or dumping it in a waterway. It may be retrieved years later, fully "live," and pose dangers to children or uninformed persons.

Under most circumstances, unservicable ammunition may be scrapped by returning it to the manufacturer. Written permission should first be obtained from the Product Services Manager of the manufacturer before shipment is made. If the manufacturer is not known, contact SAAMI at the address listed on the cover of this brochure.

Know the Following
RECOMMENDATIONS ON STORAGE AND HANDLING
Issued by the National Fire Protection Association
Battery March Park, Quincy, MA 02269 and reprinted with their permission:

NFPA 495

Explosive Materials Code

Chapter 11
Small Arms Ammunition and Primers, Smokeless Propellants, and Black Powder Propellants

11-1 Basic Requirements.

11-1.1 In addition to all other applicable requirements of this code, intrastate transportation of small arms ammunition, small arms primers, smokeless propellants, and black powder shall comply with US Department of Transportation Hazardous Materials Regulations, 49 CFR, Parts 100-199.

11-1.2 This chapter applies to the channels of distribution of and to the users of small arms ammunition, small arms primers, smokeless propellants, and black powder.

11-1.3 This chapter does not apply to in-process storage and intra-plant transportation during manufacture.

11-1.4 This chapter applies to the transportation and storage of small arms ammunition and components.

11-1.5 This chapter does not apply to safety procedures in the use of small arms ammunition and components.

11-2 Small Arms Ammunition

11-2.1 No restrictions shall be imposed on transportation of small arms ammunition other than those imposed by the US Department of Transportation or by the presence of other hazardous materials.

11-2.2 No quantity limitations shall be imposed on the storage of small arms ammunition in warehouses, retail stores, and other occupancies other than those imposed by limitations of the storage facility and by public safety regulations.

11-2.3 Small arms ammunition shall be separated from materials classified by the US Department of Transportation as flammable liquids, flammable solids, and oxidizing materials by a distance of 15 ft (4.6 m) or by a fire partition having a fire resistance of at least 1 hour.

11-2.4 Small arms ammunition shall not be stored together with Division 1.1, Division 1.2, or Division 1.3 Explosives, except where the storage facility is suitable for the storage of explosive materials.

11-2.5* Small arms ammunition that has been exposed to fire or damaged by exposure to water shall not be returned to commercial channels for reasons of consumer safety. The manufacturer shall be contacted to obtain recommendations for disposal of damaged ammunition.

Firearms Safety Depends on You

1. Always Keep the Muzzle Pointed in a Safe Direction
This is the most basic gun safety rule. If everyone handled his firearm so carefully that the muzzle never pointed at something he didn't intend to shoot, there would be virtually no firearms accidents. It's as simple as that, and it's up to you.

2. Firearms Should Be Unloaded When Not in Use
Firearms should be loaded only when you are in the field or on the target range or shooting area, ready to shoot.

3. Don't Rely on Your Gun's Safety
The safety serves as a supplement to proper gun handling, but it is not a substitute for common sense. You should never handle a gun carelessly and assume that the gun won't fire just because the "safety is on."

4. Be Sure of Your Target and What Is Beyond It
Once a gun fires, you have given up all control over where the shot will go or what it will strike. Don't shoot unless you know exactly what your shot is going to strike.

5. Use Correct Ammunition
Improper or incorrect ammunition can destroy a gun and cause serious personal injury.

6. If Your Gun Fails to Fire When the Trigger Is Pulled, Handle with Care!
Occasionally, a cartridge may not fire when the trigger is pulled. If this occurs, keep the muzzle pointed in a safe direction. Keep your face away from the breech. Then, carefully open the action, unload the firearms, and dispose of the cartridge in a safe way.

7. Always Wear Eye and Ear Protection When Shooting
Exposure to shooting noise can damage hearing, and adequate vision protection is essential. Shooting glasses guard against twigs, falling shot, clay target chips, and the rare ruptured case or firearm malfunction.

8. Be Sure the Barrel is Clear of Obstructions Before Shooting
Even a small bit of mud, snow, excess lubricating oil, or grease in the bore can cause dangerously increased pressures, causing the barrel to bulge or even burst on firing, which can cause injury to the shooter and bystanders.

9. Don't Alter or Modify Your Gun, and Have Guns Serviced Regularly
Do not jeopardize your safety or the safety of others by altering the trigger, safety, or other mechanism of any firearm or allowing unqualified persons to repair or modify them.

10. Learn the Mechanical and Handling Characteristics of The Firearms You are Using
Since guns can be so different, no person should handle any firearm without first having thoroughly familiarized himself with the particular type of firearm he is using, the safe gun handling rules for loading, unloading, carrying, handling that firearm, and the rules of safe gun handling in general.

Sporting Shooters Association of NZ (SSANZ) - formerly Shooters Rights Association Inc.

20

A formal submission to Proposed DCC District Plan Change 13 (Hazardous Substances)

This is in lieu of Submission form 5 (clause 6, First schedule RMA 1991)

Contact details; SSANZ, P.O Box 41-013, St Lukes, Auckland or (Secretary) 09-276-8697

The president (Dr Lech Beltowski) can be contacted at; 09-623-4600 Ext 27172 (work) or 021-105-2210. Work e-mail is lechb@adhb.govt.nz and home e-mail is lechb2005@gmail.com

To give away the rights of others is to give away your own- anon.

A brief history of SSANZ.

SSANZ was formed in 1989 as Shooters Rights Association by a group of pistol club members concerned not only at the growing amount of proposed gun control legislation focusing purely on law-abiding citizens but also the often underhand manner in which it was being introduced. This problem still appears to exist today.

Since then, SSANZ has been actively involved in political lobbying, in educating both media and the public about firearms related issues and in rebutting the media disinformation that overseas aligned and funded (and now entirely overseas based) anti-gun activists regularly use to try and stir up public and political concern about firearms in New Zealand.

These gun (and now ammunition control) activists have now been discredited both through research and through crime statistics following the introduction of restrictive gun laws. It is certainly our belief that, when it comes to gun control, the global statistics are now conclusive. Gun laws that are focused on restricting law-abiding citizens do not work and even worse, they have perverse, unintended outcomes. SSANZ would be happy to provide details.

Our committee consists of very experienced shooters, hunters and collectors who between them have many decades of experience and have been active in politics (party and firearms) for virtually the same period of time.

SSANZ is a founding member of COLFO, the NZ Council of Licenced Firearms owners and is represented on the COLFO Board.

We have fielded a number of communications from concerned firearms owners who have gradually become aware of the proposed changes to the district plan and want to ensure that their rights will not yet again be sacrificed simply for bureaucratic or political expediency.

Background to this submission;

Earlier this year the DCC advertised its proposed changes to the handling and storage of hazardous goods. These proposals include changes to the rules around the storage of rifle, pistol and shotgun ammunition, something that is very common throughout both urban and rural New Zealand.

Since the proposed changes will have implication for the many ratepayers who are legal firearms owners, there is a need for the proposals to be subjected to informed comment.

Those of a more cynical view would argue that for career bureaucrats these items are actually ideal for enhanced regulation. Not because regulation is required but because they are indeed so safe that even the most incompetent or non-existent enforcement would not actually create any extra danger for the public. What it would do is ensure job security without any risk of future penalty.

SSANZ would argue that in such a situation the best outcome both for society and certainly for the ratepayers of Dunedin would be to reduce regulation to the very minimum required- and that any regulation needs to be properly justified in real, not theoretical, terms.

For decades regulations have only moved in one direction. Given the "risk averse" nature of bureaucracy these days, the risk that different limits set in different legislation poses is that in future the limits will everywhere be rapidly racheted down to the lowest level. There is after all considerable safety in simply being part of the bureaucratic herd

Furthermore, using current scrambled bureaucratic logic, because the lowering of limits would then be clear evidence of a "safety need", someone on a 6 figure salary somewhere would sense a career opportunity and propose a cut to the new low limit and we all start to dance round the mulberry bush again. Such nonsense and the potential for such future abuses of power around a virtually non-existent problem needs to be nipped in the bud now.

As a minimum there is a need to ensure that local government hazardous goods regulations are consistent with (ie, not more restrictive than) nationally set limits

On a local and more personal level, SSANZ believes the ability, competence and agenda of those who wrote the proposals also needs to be subjected to scrutiny.

We believe a good case could be made for moving to exempt from ANY control everything except black powder, and even with black powder the lack of any documented incidents suggests that any perceived risk is well exaggerated.

While the present HAZNO Act makes this impossible at present, we repeat our position that at the very least the quantities need to aligned with what national legislation permits.

It is our belief (a belief based both on sound research and experience) that excessive, over-zealous and illogical regulation works to drive things underground and invariably makes things worse rather than better .

Good law is based on reality (ie, in this case proven (clearly identified AND independently documented) risk. Furthermore, not only must laws or regulations be drafted in a clear and consistent way but any grey area should- as a basic principle- default to retaining the rights and choices of citizens and ratepayers rather than enhancing the powers of bureaucrats. This is especially so when the basis of the proposed restrictions are some imprecisely defined risks they believe they somehow need to manage and in some ill-defined manner somehow "reduce".

We would point out to the DCC that regulation (even necessary regulation, which this is not) in itself does not reduce risk, it merely attempts to define it, and then draws a line between what is deemed acceptable and what is not.

We believe that with this particular issue the definition arrived at by DCC bureaucrats is incorrect. As a result the line the line they are attempting to draw is also hopelessly misplaced.

Specifics;

We support the provisions set out in Table 17.1 for class 1.3C. As they minimise unwarranted restrictions, we ask that they remain.

As regards items in class 1.1D (black or gun powder) we believe the DCC has no reason and no practical or legal justification for imposing greater restrictions than those already set under the existing HASNO regulations. This limit should therefore be increased to 15kg.

For items falling into class 1.4S (safety ammunition) we also believe that to maintain national regulatory consistency the limit for group 1 zones should be increased to 25kg (as per HAZNO regulations)

We believe this limit is in fact far too low for this latter group given the documented safety of loaded (ie, assembled) rifle, pistol and shotgun ammunition.

We restate our belief that any legislation needs to be constructed around real, documented risk, not misguided perceptions based on Hollywood special effects.

Furthermore, even if there was a clearly documented risk it is our firm belief that the proper venue making changes to such legislation is parliament and not a territorial Local Authority.

SSANZ DOES wish to be heard in support of this submission.

Dr Lech Beltowski
National President
SSANZ

21

PC – X- _____
(Office Use Only)

DUNEDIN CITY COUNCIL
Kaunihera-a-rohe o Otepoti

SUBMISSION FORM 5
Clause 6 of First Schedule, Resource Management Act 1991

Submission on publicly notified proposed District Plan Change 13 – Hazardous Substances.

Submissions can be:

Posted to: Planning Policy Manager, Dunedin City Council, PO Box 5045. Moray Place, Dunedin 9058

Delivered to: Planning Enquiries, Customer Service Centre, Civic Centre, 50 The Octagon, Dunedin

Faxed to: 474 3451 (if you fax your submission, please post or deliver a copy to one of the above addresses)

Emailed to: planning@dcc.govt.nz

Note to Submitter: The closing date for serving submissions on the Dunedin City Council is **12 December 2011**.

Your name and contact details:

Your Full Name: Andrew Neil Keene

Full Address: 28c Maitland St Dunedin

Telephone: 021 1544091 Facsimile: _____

Email Address: andy.keene@hotmail.com

I: ~~Do~~/**Do Not** wish to be heard in support of this submission at the hearing

If others make a similar submission, I will consider presenting a joint case with them at a hearing.
(Delete the above statement if you would not consider presenting a joint case at a hearing)

The specific provisions of Proposed District Plan Change ___ that my submission relates to are:
(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on a separate sheet if necessary.)

Make it the same as Auckland, Wellington and Christchurch 25 kg's not 15 kg.

Dunedin City Council

12 DEC 2011

My submission is that:
(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on a separate sheet if necessary.)

I seek the following decision from the Council:
(Please give precise details.)

Signature of submitter: _____ **Date:** 12/12/11
(or person authorised to sign on behalf of submitter)

Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the plan change process.

Electronic Submissions: A signature is not required if you make your submission by electronic means. Submissions can be sent by email to planning@dcc.govt.nz

22

PC – X- _____
(Office Use Only)

DUNEDIN CITY COUNCIL
Kaunihera-a-rohe o Otepoti

SUBMISSION FORM 5
Clause 6 of First Schedule, Resource Management Act 1991

Submission on publicly notified proposed District Plan Change 13 – Hazardous Substances.

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Emailed to: planning@dcc.govt.nz

Note to Submitter: The closing date for serving submissions on the Dunedin City Council is **12 December 2011.**

Your name and contact details:

Your Full Name: JAY MACLEAN

Full Address: 469 HENLEY ROAD, HENLEY OTAGO 9073

Telephone: 03 486 2252 Facsimile: _____

Email Address: HENLEYWORKS@XTRA.CO.NZ

I: **Do**/Do Not wish to be heard in support of this submission at the hearing

If others make a similar submission, I will consider presenting a joint case with them at a hearing.
(Delete the above statement if you would not consider presenting a joint case at a hearing)

The specific provisions of Proposed District Plan Change ___ that my submission relates to are:
(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on a separate sheet if necessary.)

SUBMISSION ON DISTRICT PLAN CHANGE 13 - HAZARDOUS SUBSTANCES, RELATING TO 17.1 EXPLOSIVES.

Dunedin City Council
12 DEC 2011

22

My submission is that:
(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on a separate sheet if necessary.)

SEE SEPARATE SHEETS.

I seek the following decision from the Council:
(Please give precise details.)

REGARDING THE STORAGE OF RELOADING POWDER & SAFETY AMMUNITION, LIMITS AS STATED IN HSNO REGULATIONS (2003) SHOULD BE ADOPTED.

Signature of submitter: _____ **Date:** 10/12/11
(*or* person authorised to sign on behalf of submitter)

Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the plan change process.

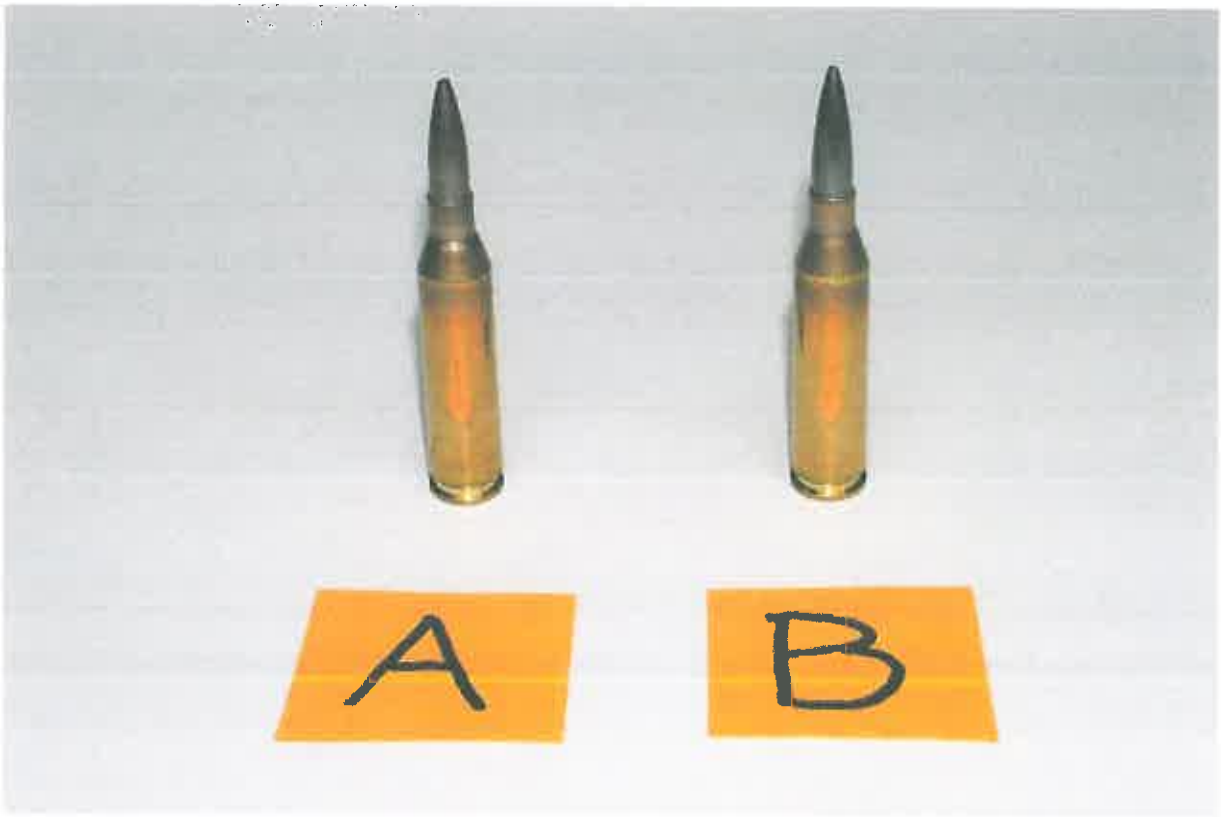
Electronic Submissions: A signature is not required if you make your submission by electronic means. Submissions can be sent by email to planning@dcc.govt.nz

My submission relates to the proposed changes to the quantity of smokeless ammunition and reloading powders allowed to be stored as set out in Table 17.1.

I am opposed to the proposed changes on the following grounds:

1) The identification and quantifying of the propellant in loaded cartridges is near impossible and therefore the proposal is completely unworkable and unenforceable.
2) I believe that compared with other household items, ammunition and reloading powders offer no significant increase in risk.
3) That the quantities being proposed deviate from HSNO regulations and are too small and would put many sportsmen/women, hunters and collectors at an unnecessary disadvantage and inconvenience.

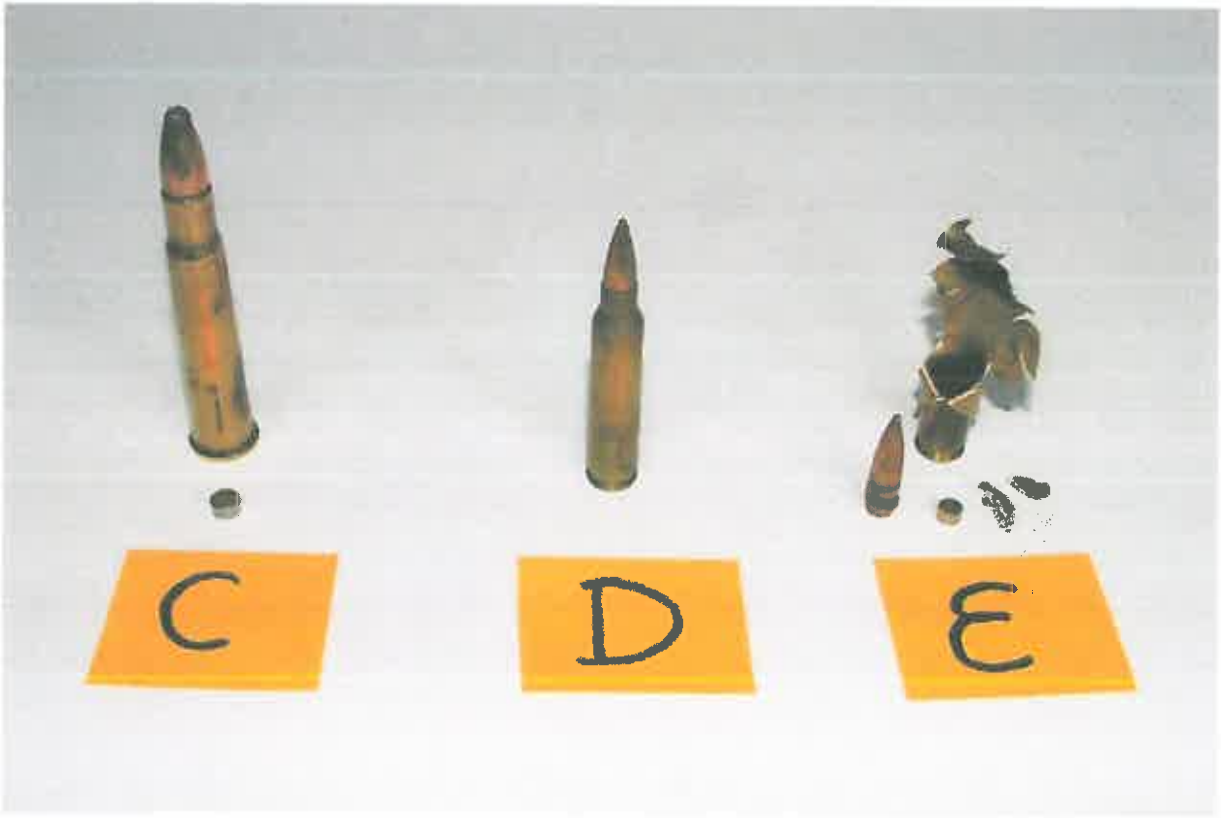
After some initial vagueness, it now transpires that the proposed weight limits are to be the net weight of the powder contained within the cartridge and not the loaded case as a whole. So weight of loaded cartridge, minus case, minus projectile, minus primer (interesting?), this leaves us with the weight of the powder.



In the above picture are two loaded cartridges, A & B, both .243 Winchester, a popular hunting cartridge in NZ. Both A & B are fired from the same rifle, both use the same brand of cartridge case, both use the same brand of primer and both use the same style of projectile. Now then, one cartridge is designed to be shot at extended ranges and has a full charge of powder to ensure a flat trajectory over the long distances involved. The other cartridge is designed to be used at shorter ranges on pest control duty, when a suppressor is fitted to the rifle (a suppressor fits on the end of the barrel & reduces the sound coming from the rifle on firing). In order to get the maximum benefit from the suppressor when dealing with a large number of pests, the powder is different, the charge weight is around half that of the long range cartridge and whilst the projectile is the same type, it is of a different weight. Can you tell me which cartridge, A or B has the most powder? Visually they both look identical and weighing the two loaded cartridges would tell you nothing. Okay, I know which is which, because I loaded them and I keep notes, but how are the people that have to enforce this going to know? They'd have

to trust my word.
Point two, go into any gun shop in town and pick any ten different boxes of factory loaded ammunition off the shelf. Any calibres any brands. What is the net quantity of the powder contained in those boxes? Hmm doesn't say does it. They usually tell you the projectile weight and the velocity that the projectile is travelling at as it exits the gun, also the fact that you will die of lead poisoning & birth defects if you live in California, and then the rest is advertising and padding, nothing about how much powder is contained within the cartridge case. So what now, choose a nominal weight to cover every cartridge? A number between say a 32 Auto and a 50 BMG, 1.2 grains and 240 grains?
The accurate identification of the weight is impossible, the proposal is completely unworkable and unenforceable.

2)
The only possible reason I can think of as to why there would need to be a limit set on the amount of propellant & loaded ammunition stored, would be from fear of ignition from an external fire source. I think there is a misconception here, that if a large amount of reloading powder and loaded cartridges were to be in a burning building the results would be a Hollywood style big bang. In reality this is not the case. Ammunition propellant burns at a very fast rate, but only displays a violent explosive reaction when ignited in a container that is strong enough to allow the pressure to build to a significant amount, i.e. the chamber of a gun. The containers that reloading powder is supplied & stored in are of light water proofed cardboard or plastic construction and thus do not allow the burning propellant to build enough pressure to do any damage. The container wall simply melts or burns through, the powder ignites, burns rapidly within a couple of seconds and then its over. No explosion. Even powder contained in loaded cartridges is not sufficiently contained to cause any real explosive tendencies when ignited from an external source.



In the picture above Cartridge C is a .303 British, a popular hunting cartridge and has a charge of around 45 grains of powder and in this example a projectile weighing 150 grains. When fired from a rifle the projectile from this cartridge is capable of travelling 4-5kms. An external heat

source was applied to cartridge C (before the photo was taken) and the result was that the primer was ejected 1.2m from the bottom of the case and the powder burnt rather unimpressively like a mini roman candle from the primer pocket, for around 3 seconds. Yes, this picture was taken after the event and the projectile is still in place & primer is shown in front of cartridge C. The next two cartridges (D & E) are 5.56x45 NATO, as used by the NZDF and hundreds of civilian service rifle shooters within NZ. It contains around 24 grains of powder and the projectile weighs 62 grains. These two cartridges were laid next to each other, touching. An external heat source was applied to cartridge E and after around one minute "POP", the case ruptured along it's length, the primer & projectile were ejected and two small fragments of case broke away. All the parts were contained within an area of 2 meters, the two case fragments and the primer travelling the furthest distance. All velocity, but no mass, so they didn't get far. So even in a loaded cartridge, the powder was not contained enough to produce any significant explosion. The other really, really important thing to note here, is what cartridge D did, well it did nothing. It was sitting directly next to and touching cartridge E when it burst and it did absolutely nothing. No chain reaction, no sympathy burst, no Hollywood mass explosion. So if there was a box of 20 cartridges in a burning building, you would get 20 "POPs", if you had 10,000 cartridges in a burning building, you would get 10,000 individual "POPs", not a mass explosion. If there was a big explosion, it would have been the LPG cylinder from the heater in the lounge going through the roof.

3)
I am a regular rifle club and pistol club member, I hunt with a rifle, I duck shoot, I also collect and shoot antique & classic military rifles & pistols. I shoot nearly 30 different calibres and reload for many of those. My wife also shoots at a rifle club and pistol club. Not a week goes by without us participating in some form of shooting activity, firing several hundred rounds in an afternoon is not uncommon. In order to pursue our hobby economically we often buy ammunition and components in bulk, to get the best price and to save having to go to the gun shop every week. When I reload, I will often set the dies up and reload a couple of months worth of ammo rather than just what I need for the next weekend. It saves time and ensures consistency. I shoot at club level and I am certainly not a top competitive shooter, but many competitive shooters will buy ammunition and components in bulk in order to maintain continuity of supply and to be able to stock up on ammunition from the same production batch. As in any manufacturing process, batch to batch differences within ammunition exist and having to change to a new batch half way through a competition or even a season, can be a disaster.

I hope I have been able to show you that the proposed changes regarding reloading powder & ammunition is unnecessary, unworkable, unenforceable and a waste of council time and resources. Staying with the HSNO limits would be the best policy. I am sure Council has more worthy tasks to concern itself within the current climate.

Jay MacLean

Ladies Challenge Shield, first competed for in 1876.
Shot for & won in 2011 by a very proud team of Dunedin sportsmen.