



Merlin Archery

329 Wetmore Road,
Burton on Trent
DE14 1SP

www.merlinarchery.co.uk
support@merlinarchery.co.uk

DPA

To: The Southport Inquiry

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As requested by the Inquiry, please find my proposals for improvements related to the online sale of Crossbows and Archery Equipment.

License retailers who sell crossbows

In the past I have seen crossbows being sold at car-boots and country fairs. I would suggest there should be some controls in place to ensure that businesses selling crossbows are legitimate.

I would not be opposed to some type of licensing or national registration of retailers who sell crossbows with the conditions and cost of licensing to be decided.

Government run online portal specifically designed for retailers who sell age restricted products

In our case, crossbows, but could be universal for knives and other age restricted products.

This portal would contain the following information all in one place.

- **Law Change Notification**

Somewhere sellers of particular product categories can subscribe to get notifications of upcoming law changes.

- **Government provided age verification check service**

Since we are being required to use government mandated ID for proof of age, then we should be able to input those numbers into a database with a date of birth to get a 'Match/Fail' response. This data already exists, so why not connect it?

This seems like a simple way to screen out fraudulent ID and reduce the retailers risk of error.

- **Industry standard age verification process**

A step by step instruction on the correct and proper method of verifying age should be set out for retailers to follow.

- **Background check service**

At the same time the age verification check is carried out, we could get a 'Yes/No' response if there is some reason a customer should not be permitted to buy the product.

- **Suspicious activity and reporting**

I did reach out to the Staffordshire Police Force to ask if it would be better to have a single point of contact on a local level, or some other way of communicating suspicious activity to them. I was advised that calling 101 or 999 was the best mechanism for reporting.

During my evidence there was emphasis put on the suspicious nature of ARs email correspondence with us.

It would be helpful to have clear guidance on where the threshold should be on the reporting of suspicious activity and the correct protocol for reporting.

- **Tracking customers of concern.**

Similar to a 'Pub Watch' type scheme, where retailers can share details of suspicious customers, but tailored to suit smaller independent sellers of crossbows.

This would operate more efficiently if it was hosted outside of the government portal so its design and function can be adapted more easily.

This would be a voluntary scheme, where a retailer could enter details into a central database that can be accessed by other retailers in the scheme.

Retailers can search the data directly from a website, or download the data as a CSV, or integrate it automatically via a script or API within their systems to flag for matches on new online orders.

When retailers add a customer to this database they would select the reason from a predetermined list, plus some additional background information to help other retailers decide on if they should be refused, reported or ask more questions.

However, I do have some concerns with this scheme.

I do not want to be responsible for hosting the data on our own company servers, nor should it be held by any single retailer. It should be hosted by a charity or other 'not for profit' organisation that would take responsibility for storage and distribution of the data.

I have concerns over the database being abused by some retailers in our space who may add legitimate customers to the list. Unfortunately there are some retailers we do not trust, and the integrity of the data would be key to its success.

Therefore some vetting of the members would be required, preferably by trading standards or the police. Perhaps as part of the licencing of crossbow sellers.

Crossbow register for in-store sales.

An internal crossbow register should be kept for in-store sales, with details of the customer and crossbow model. ID should be mandatory and recorded, even though someone may be clearly over 18 in a face to face setting. We have had some customers choose not to buy a crossbow in our shop because they did not want to give their details, which suggests it works as a deterrent.

The nature of online sales suggests a detailed record of a crossbow sale would automatically be recorded, but it all could be combined within a single register for ease of access.

Archery Bows vs Crossbows

During the Inquiry I was asked about why I did not believe additional restrictions were required for 'regular' archery equipment, but I did support the proposed additional restrictions for crossbows.

During my testimony I gave some examples of why that was, but I do not think I gave a complete explanation and would like to provide more detail here.

Our business has been involved in the manufacture and sale of archery equipment for 50 years. The number of concerning incidents involving non-crossbow archery equipment are incredibly rare.

Because I cannot identify any particular area of concern I cannot offer any solutions to address them.

But I do think it would be helpful if I detailed the distinct differences in the operation of a bow vs a crossbow, and why the crossbow is a particular area of concern.

These key differences are

- Skill level required to be proficient
- Practicality if chosen as a weapon
- Power
- Sporting Use
- Use by under 18's

Skill level required to be proficient

A person can become proficient in the use of a crossbow with minimal instruction. A crossbow can be cocked, aimed and shot with relative ease and accuracy. It is a mechanical device, designed to minimize the need for operator input.

A person cannot become proficient in the use of a bow with minimal instruction. The skill level required to be accurate with a bow is extremely high. A bow is very sensitive to operator error, as it relies on the successful coordination of a complex sequence of events to shoot accurately.

Practicality if chosen as a weapon

Crossbows can be cocked, loaded and left in a 'ready to shoot' position for a quick, on-demand first shot. They can be shot one handed and are easier to conceal due to their smaller size. Most crossbows have a slow reload time after discharge. (There are some multi-shot style crossbows)

Bows require two hands to shoot and cannot be held in their 'ready to shoot' full draw position for much more than 10-20 seconds due to archer fatigue. They are unwieldy and difficult to conceal. They are difficult to shoot accurately and have a slow rate of fire.

Power

I do not like to use the power of a bow or crossbow as the single metric to determine the danger it would pose as there are many other factors that should be taken into consideration, however, power is relevant.

The average power of a crossbow is much greater than that of the average bow, and this power can be accessed by most people irrespective of their strength because of the common use of cocking aids, such as a cocking rope or crank. This power can be stored within the crossbow for an extended period of time.

Archery bows have a natural limit to their power which is directly proportional to the strength of the individual. Archery bows have already reached their maximum power, with only small gains in efficiency still possible.

Crossbows continue to increase in power, while an archery bow has been relatively stable for a long time.

Sporting Use

The use of crossbows for sporting purposes is legitimate, but mostly limited to private land. There is allowance for crossbow use within the different sporting governing bodies, but they are heavily restrictive in nature. Often archery clubs do not allow their use. I would estimate 95%+ of all crossbow sales will be sold to individuals who will be using them on their own property for leisure use, rather than the structured environment of a club or competition use.

For archery bows, there is an extensive network of clubs in the UK (+1000), plus a healthy tournament scene and several national governing bodies for particular styles of archery. There is still a significant amount of people use archery bows on their own property, however 'regular' archery is more closely connected to organizations such as the Olympics, scouting, activity centers and clubs.

Use by under 18s

It is rare, if at all, that we see under 18's wish to take up crossbow archery as a hobby.

There are 1000's of children learn non-crossbow archery as a hobby through an extensive network of clubs, scout groups and activity centers, and many children compete in tournaments nationally and internationally.

Importantly, children do own their own equipment.

The practicality of not allowing under 18's to buy or own their own equipment would cause significant harm to the sport of archery in the UK and affect a lot of people.

I hope the above is useful and I am happy to answer any further questions.

If the Inquiry would like to inspect any particular piece of archery equipment, or require a demonstration, they would be welcome to visit us.

Yours sincerely,

Signature

Ben Jones

Managing Director