



## Community feedback

Phase 1 – IPC Shooting Technical Rules and Regulations consultation period

September 2016

### International Paralympic Committee

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# 1 General Regulations

Article no.	Topic	Comment	Suggested Change	STC Comments
1.1	Events	Too many shots. Should be easier to conduct the competitions	<ul style="list-style-type: none"> <li>▪ R1 and R2 should be combined to mixed 40 shots.</li> <li>▪ R7 and R8 should be mixed 60 shots.</li> <li>▪ P1 and P2 should be mixes 40 shots.</li> <li>▪ P4 should be 40 shots.</li> <li>▪ FTR1,FTR2, P5 and FTP should not be level 2/3 competitions</li> </ul>	<ul style="list-style-type: none"> <li>▪ STC takes the recommendation into consideration, as we need to consider evolving the sport, and making space for future growth.</li> <li>▪ We will be making data analysis regarding score comparison between male and female athletes over 40 shots, and review and discuss the results regarding if the data points to equality of performance and potential for event merges.</li> <li>▪ We will also review the P4 scores over 40 shots to see if there are any consistent changes in the ranking of female athletes between 40 and 60 shots.</li> <li>▪ STC proposes to remove FT events to be removed from the Programme for Level 3 competitions (Major Championships).</li> </ul>
		Events R4 and R5 should be separated by gender.	In R4 and R5 event there is already a lot of female shooters. SH2 female shooters are the only ones, which don't have their own event. Reason for this was, that 10 or 15 years ago, there was not enough shooters in SH2 class. But in recent years, there is enough female shooters, so they should have their own event. As everything stays the same (shooting time, number of shots) it will not have any influence on the timetable. It only means two finals more.	<p>We have researched this matter: for an event to Paralympic inclusion there needs to participate athletes from 32 nations over 3 regions. Based on our research there is not sufficient participation of SH2 female athletes for a female-only SH2 event to be established:</p> <ul style="list-style-type: none"> <li>▪ Since 2010, 48 female SH2 athletes from 26 NPC's across 4 Regions have participated in IPC Shooting competitions.</li> <li>▪ In 2014 there participated 31 SH2 female athletes from 21 NPC's, and in 2015 there participated 33 SH2 female athletes from 24 NPC's.</li> <li>▪ On average, in 2015 there were 8 female athletes from 6 NPC's participating in the R4 event per competition, and 9 female athletes from 8 NPC's participating in the R5 event per competition.</li> </ul> <p>Therefore to split the events would not be currently a viable choice, as the events would not meet the criteria for Paralympic inclusion.</p>

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1.4	Competition Cycle	The financing of national teams normally depends on the Regional and World Championships and Paralympic Games. Since the year 2000 there were only 4 Regional championships - European championships (2001, 2005, 2007 and 2013). In 2003 there was only Small Bore EC. It causes a lot of damage to European countries, which have problems with financing.	If in the year, where there should be EC, there is no organizer for EC, one of the World cups should be considered for EC.	IPC SH recognises the necessity to secure regional championships on a regular basis. 2015 was an anomaly due to the Quota Place allocation at World Cups, which therefore meant that we could not guarantee participation numbers in RCH in 2015 we made the decision to not have RCH in 2015. We are working to secure hosts for Championships for 2017. In 2019 our goal is to include 2019 RCH for direct quota allocation for Tokyo 2020, in order to be able to attract LOCs. Should any team or NPC be interested to find out more about hosting Championships, we urge you to get in contact with IPC Shooting.																								
1.5.3.1	Paralympic Games Programme of Events	R9 is not included.	R9 (SH2) should be a Paralympic sport (same as SH1 R6).	<p>IPC SH is monitoring participation in this event and hopes it will develop to the never level where it can be considered for Paralympic inclusion.</p> <p>Current participation statistics in R9 since 2011 are:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>No. of athletes</th> <th>No. of NPCs</th> <th>No. of Regions</th> </tr> </thead> <tbody> <tr> <td>2011</td> <td>5</td> <td>3</td> <td>1</td> </tr> <tr> <td>2012</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>2013</td> <td>35</td> <td>19</td> <td>4</td> </tr> <tr> <td>2014</td> <td>33</td> <td>17</td> <td>4</td> </tr> <tr> <td>2015</td> <td>33</td> <td>19</td> <td>3</td> </tr> </tbody> </table> <p>Since 2013 (when R9 was included as a compulsory event in the IPC Shooting competition programme), it is clear that the R9 event has grown. However, the event is still has some distance to grow if it is going to meet the required standards for Paralympic inclusion ( for example, there needs to participate athletes from 32 nations over 3 regions).</p>	Year	No. of athletes	No. of NPCs	No. of Regions	2011	5	3	1	2012	0	0	0	2013	35	19	4	2014	33	17	4	2015	33	19	3
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1.6.1.1	Entry Fees	<p>In last 5 years entry fees for world cups and World and Regional Championship increased to the unacceptable level. Still in 2010 the sum 1100 EUR per person was maximum entry fee. This year, entry fees for world cups were 1600 EUR and 1900 EUR. Those are sums, which countries will not be able to bear, what will lead to the fact, that shooting will become sport only for very rich nations. The purpose should be as many participants as possible.</p> <p>The Basic Entry Fees are far too high and many countries would not be able to participate in our competitions if we continue with</p>	<p>Revision should be done, why there is/was such raise of the entry fees. Then the system, where teams can organize their own accommodation and transport should be allowed.</p> <p>Strongly suggesting for organisers to charge fee only to cover the cost for the competitions</p>	We recognise that the costs faced by NPCs to attend competitions have faced increases in recent years. As para-sport has grown and developed, the requirements, standards and costs faced by LOCs (for example: anti-doping, results provision, number of required officials and their transport and accommodation costs, accessible transport provision, electronic results provision, range hire) have also risen. It has therefore been a constant challenge to negotiate with LOCs to keep fees minimised whilst still ensuring enough income to the LOC to make the competition viable (not profitable).																								

Article no.	Topic	Comment	Suggested Change	STC Comments
1.6.1.1 <i>cont.</i>	Entry Fees, <i>cont.</i>	the fees as it is.	(shooting ranges, officials, medals, doping control ...) and leave to the countries to organise their own accommodation, meals and transport). Organisers could name a few hotels suitable for accommodation, but it should be up to countries to do the bookings.	In 2016, IPC Shooting has already worked to eliminate fixed full package fees (which are fixed to cover the full competition period), in favour of fees which are either: a) packages priced at a daily rate, or; b) entry fees exclusive of accommodation, and accommodation booked separately by the LOC. IPC Shooting is considering other pricing options can cost models for World Cups, which could keep costs to NPCs minimised, but also ensure LOCs can continue to host viable competitions.
1.6.2	Athlete Eligibility (Quotas for 2020)	This cycles and qualifications for the Rio'16 displays all the benefits having the quotas available to the best athletes (in the line with ISSF) and shows some area to improve for the qualifications rules for 2020. I support mixed events and I believe at this stage there is no room to separate women as separate events for the Paralympics. However, my thoughts on the matter of women in the mixed events, who are allocated a direct quota to the Paralympic Games on gender rather than performance, is anti-sporting, contrary to the IPC ethos and discriminatory. Discrimination on the basis of gender is against Human Rights. There are alternatives in promoting the participation of women in shooting. Also there was number of times where "female" quota had to be transferred to the other events as result of very poor performances by female athletes. In the real female events R2, R8 and P2 we had only 16 quotas (5,5,6) and at the Paralympics those events are the weakest events with the very small number of athletes. Theoretically we could end up with less than 10 female in the real female events.	I believe we should find the reasonable minimum number of female quotas (maybe 30-35) for distribution to the pure female events R2, R8 and P2. Mixed events should be treated equal and quotas distributed by performance only, with the reasonable anticipation that number of female athletes will qualify as result of their performance rather than gender.	The Rio 2016 Qualification Criteria was designed to ensure the qualification of the best athletes whilst protecting and safeguarding a minimum level of participation of athletes across all events, genders, and sport classes. Participation of female athletes has started to increase as a consequence of the increase in qualification opportunities and investment by NPCs in female athletes. The direct slot increase from 140 to 150 slots was granted to IPC Shooting from the International Paralympic Committee on the onus of increasing the number of qualification opportunities and slots safeguarded for female athletes. As a quality assurance through the allocation process, athletes must obtain an MQS score performance in order to be eligible to be allocated the direct slot. Following Rio 2016, IPC Shooting will review the impact and performance of the Qualification Criteria, and will consider all potential and/or necessary adjustments for the Tokyo 2020 Qualification Criteria. The small number of occurrences when slots were reallocated to a secondary event based on non-attainment of MQS will be carefully considered when analysing the future balance of slot allocations per event.
1.6.3	MQS	I think MQS for R5 (628) is too high. It is far to higher compared with most of the MQS's for other events.	Suggestion is 626.	Before setting the current MQS levels an analysis was made of athlete performance scores, and the MQS was set at a level of 60% of the highest results scores per event. Following Rio 2016, IPC Shooting will reanalyse the scores per event from the last cycle (2013-2016), and if necessary, the MQS levels will be adjusted accordingly.
1.9.2	Technical Meeting	I'm not sure for the reason for this 2 hours rule.	Classification process must be completed before the start of the Technical Meeting.	Protest time for classification is 1 hour after the end of classification. The 2-hour rule exists to cover the 1 hour protest time, plus 1 hour to handle potential protests filed.

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1.10	Start Number	It is very annoying to watch Loaders with the big Bib's moving around and sometimes disturbing athletes. Also it is not a good picture for TV cameras.	If we need them, Bib's for Loaders should be small to be able to be attached on the sleeve.	Clarification will be added that loaders must attach Bibs securely (in accordance to ISSF rules), i.e. pinned to Loaders' shirt with pins top and bottom. IPC Shooting does not agree to remove the requirement for loader bibs as it is necessary for all persons on FOP to be accredited/marked. Just as Officials wear vests, Loaders should have some kind of easily visible bibs. This presents a better vision to cameras that the loaders are an authorised loading assistant accompanying a specific athlete.
1.13	Coaches' Instruction	Coach wanting to talk to athlete	Add rule about how coaches make a request to talk to the athlete and how ROs deal with it	Rule 1.13.1 specifically states that "Coaches are permitted to approach the line on the <u>request of the athlete</u> , if permitted by the range official". The purpose of the rule is to allow coaches to visit their athlete on the line when the athlete is not able to leave the firing line (due to their impairment and/or shooting position) to speak with their coach as they wish. The rule is not intended for use by coaches who wish to approach their athletes uninvited. Therefore, a clarification will be added as 1.13.2 that "Coaches are permitted to approach the line by the <u>request of the coach</u> only during sighting time and if permitted by the Range Official".
		Rule does not cater for Coaches wishing to approach their athlete.	Add section that say's" Coaches wishing to approach their athlete must request permission of RO."	
		Some of the countries are using this rule to walk to the athletes almost every few minutes and it is very disturbing for the other athletes on the line.	Review this rule and it may be a solution to limit the number of approaches to the athletes (may be 3 times).	
1.16	Rankings	Our very old World Ranking absolutely don't reflect reality and don't reward the best athletes as in all other sports.	Adopt ISSF World Ranking.	IPC SH accepts that Ranking system needs to change. A new proposal will be released as part of 2 <sup>nd</sup> Consultation round.
New	Final	When entering the Final, for most of the athletes, especially SH2 preparation of 2 minutes is not long enough.	Review and consider to extend time to 4 minutes for the preparation time.	For SH2 events, we have trialled 1, 2, 3 and 4 minute times during 2015 World Cups. By our evaluation, 2 minutes is sufficient time and all athletes were always prepared by this time. 2 minutes time will be given for SH2 events, for all other events it will remain at 1 minute.

## 2 Apparel and Equipment

Article no.	Topic	Comment	Suggested Change	Comments
2.2.1.1 & 2.2.1.2	Shooting Jackets	This rule does not allow for an SH1a shooter who shoots kneeling or prone from a low stool who can drape the jacket either side of their legs with some of the buttons undone. There is no advantage gained in this case and it would mean bringing a second jacket with the extra cost associated with it.	Add a line to either rule stating that where a number of the buttons are open and the remainder of the jacket is draped around the legs and stool that an ISSF 'Ordinary' jacket may be worn.	Accepted. Information is currently included in the IPC SH clarifications and will be incorporated into the next rulebook.
2.2.1.4	Jacket exceptions	Allow athletes that shoot R6 from the ground may use the same jacket for R3	Allow or clarify that a longer jacket may be used for R3 IF 1/2 UNBUTTONED so that it rides outside the thighs.	
2.2.2.1	Shooting Trousers	Shooters competing in R7/8 are at a distinct disadvantage if they use a chair during the Kneeling/Prone phases and shoot the Standing phase from a high-stool or free standing as the time required to change trousers eats into the change/zero time. Some prosthetic wearers need to remove the prosthetic altogether during this time. It also conflicts with the ISSF Dress Code where the athlete is changing on the line.	As per ISSF Rule 7.5.5.4 shooters should be allowed wear shooting trousers while Sitting/ Kneeling if they will use them in the Standing position from a high-stool or free standing.	
2.3.3	Equipment	The rules must be maintained	The designated area must be clearly marked, measured according to the ISSF rules.	The TD will always try to ensure the firing point area is clearly marked.
2.3.6	Equipment	Need to prevent addition of material etc that bond in any way to a jacket, i.e. spikes have been seen		Agreed. IPC Shooting will amend rule 2.3.6 to: "However the rifle needs to remain within the specified dimensions, <u>and the adaption must adhere also to rule 2.3.1</u> "
2.3.6	Rifle grip	Use of handles under rifles (for SH2 athletes who are not able to keep their hand onto of the rifle)		IPC Shooting does not agree to this proposal, and will not amend the rules to permit it. This is because it exceeds the depth of the foreend of the rifle stock.
ISSF 7.4.4(b)	Rifle (ISSF) rules	According to ISSF rules 7.4.4 b) Key D, the maximum depth of fore-end is 9mm (Air rifle).	For SH 1 shooters, the depth should be allowed to be higher in order to avoid injury because many shooters have to lean backwards in order to aim.	<i>STC has asked the author to provide more information and a proposal what they suggest the maximum depth is changed to.</i>
2.4.3.1	IPC Shooting Specific Equipment	Does not mention the checking/marking of Free Back Height".	Add mention & Reference to 2.7.11.5.	The visible free height is in relation to Shooting Chairs; which is listed as IPC Shooting Specific Equipment. IPC Shooting will amend 2.7.11.5 to become 2.7.11.4 (a), to ensure clarity of the rule.
2.4.5	One-time-only Equipment Control	Many times equipment control is out of control and very stressful for all involved.	It is very important to reinstate this procedure.	STC do not feel that One-time only Equipment Control can be reinstated reliably (and in ISSF it has also been seen to increase the number of disqualifications). However, the STC recognises the stress and long waits that equipment control can generate. Therefore the STC are looking at other ways to ease the process, for example: increased number of EC
		This has to be enforced as soon as possible as the equipment control is the most traumatic and chaotic part of the competition. The problem and delay always is made at IPC	At least 2 IPC Equipment Control stations should be organise.	

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2.4.5 <i>cont.</i>	<i>One-time-only Equipment Control, cont.</i>	control, so the number of referees there should be increased.		stations; increased availability of equipment control throughout the full duration of each competition; online pre-booking of equipment control appoints or appointment scheduling controlled by event (athletes competing in those events earlier in the competition get priority).
2.5.5	Strapping	Really, this is allowed?	No one should be allowed to strap themselves to the chair, regardless of injury. A double amp can still control their stumps and use them, if strapped, for added stability.	Double upper limb amputation can have an effect on core-balance; therefore the purpose of rule is to ensure stability for double above-knee amputee athletes competing without a backrest (SH1A/SH2A). STC will amend the rule to say "In the case of SH1/SH2A athletes with double above-knee amputation, a strap across the stumps and strapped to the chair is permitted"
2.6.2	Trigger adaptations	The rules are not clear enough.	Trigger adaptations must be inside of max dimension of the gun. (fit in the box). Weapon must be able to lay down on the table without firing.	STC will try to clarify it better. Rule 2.6 will change to "Trigger <u>extensions and</u> adaptations; rule will be added to include the definition of trigger adaptations and extensions (as per Appendix).
2.7.2	High stools	High stools, Height should be determined by the T.D. The T.D. should be only be used for disputes. The suggested rule opposite should be enough for equipment control and juries.	Rule 2.7.2. High stools are shooting chairs that have a seat at a height equal or higher than the athlete's mid thigh height. The mid thigh height is measured from the knee joint to the hip joint along the femur bone.	Change recommendation "High stools are Shooting Chairs when the athlete sits with their feet on the ground, with a seat at a height equal to or higher than the athlete's mid-thigh height. The mid-thigh height is the mid-measurement between the knee joint and the hip joint (measured along the femur bone). Any disputes will be resolved by the TD in his/her discretion"
2.7.2	Shooting chairs; shooting positions	Currently, SH1B and SH1C shooters are allowed to use wheelchair with backrest, so additional adaptations and support for standing shooters those use prosthesis will make competition more fair.	In order to provide equal competitive opportunities for SH1A shooters and SH1B, SH1C shooters, we suggest to allow SH1A shooters to have reasonable adaptations or support in order to fix high stool more firmly or use elements of the chair for leg support.	The technical rules regarding backrests were formulated in line with Classification. Athletes are provided equipment allowance relative to the outcome of their classification assessment. Use of a backrest is permitted only for athletes with impaired trunk function. SH1A/SH2A athletes have full trunk function, therefore to allow measures for increased stability would be to allow unfair advantage. When using high stools athletes must be able to lift both feet off the floor without losing balance.

Article no.	Topic	Comment	Suggested Change	Comments
2.7.4	Sideboards		Suggest one rule only for sideboards in all positions, i.e. not exceed the height of the curve of the wheel	IPC Shooting understands this feedback and agrees that the sideboards should be compulsory removed, with no exceptions. STC to change 2.7.4 to state that sideboards are not allowed, regardless of wheelchair construction. (remove "unless sideboards are non-removeable", etc)
		Generally the rule is, that sideboards are not authorised, UNLESS sideboards are not removable. If something is not allowed, it should be removable and the fact that is not removable can not make exception. Wheelchairs should be adapted to this rule, otherwise rule is not necessary.	The text after "unless" should be deleted.	
2.7.5.	Shooting chairs	The height of the wheels of wheelchairs is often so high, that there is doubt all the time if shooter lean the elbow on the wheel.	The height of the wheels of the wheelchair may not exceed the height of the hip when shooter is sitting	STC agree with proposal. Add new rule that "The height of the wheels of the wheelchair may not exceed the height of the athlete's hip when in the sitting position"
2.7.6	Sideposts	Athletes must not lean on side posts, this is almost impossible if the chair has a fabric back. And allowing 5cm of padding with 8cm of depth creates a cradle and improves stability.	Only straight, non flexible backs, with a max of 5cm of cushion should be allowed. I've seen competitors sandwiched in between the seat posts, there is definitely support gained from this.	Regarding side posts: STC recognises that it is unavoidable for some athletes using a flexible backrest not to touch the posts. A clarification will be made that "the sides of the torso may touch the side posts HOWEVER it is NOT permitted for athletes to use the posts to gain additional stability of the spine. Therefore, it is not permitted that the spine leans on the post when the athlete is in the shooting position".
2.7.7	Cushion Compression	Not clear if the cushion may be more than 5cm and how to measure compression	Clarify intent in wording	Change wording to be added that "the thickness of the upholstered material is unlimited, however DEPTH of the compression is to be not more than 5cm when the athlete is sitting"
		No weight or pressure measurement is specified which can give rise to differences in the measurement, depending on the strength or weight of the equipment control person. If a cushion is 5cm or less in depth it will comply. If it is more than 5cm in depth then a specific weight and specific diameter of test rig needs to be specified	That the measurement be subject to (for example) a 100mm diameter surface being loaded with x kg's and the depth of cushion compression must not exceed x cm	
		Reword	The chair may be upholstered with material with a maximum thickness of 5cm and is compressible.	
New	Cushions (lateral support)	Contoured cushions do appear	Cushions should be flat across the width of the cushion and to stop the athletes legs separating the legs can be strapped as in rule 2.5.4	STC will make more research on this matter.

Article no.	Topic	Comment	Suggested Change	Comments
2.7.10.1	Backrest slack	A hardshell back with 3cm depth plus 5cm of cushion is allowable? No curved hardshell backs is what I've been told.	This really needs to be discussed with officials, classifiers and an athlete panel so everyone has a clear understanding of how this affects shooting. SH1C pistol shooters with no abdominal muscle control are the only competitors that should have the opportunity to use a curved back.	Curved hard shell backrests are permitted, but only to a maximum depth of 3cm. Increased depth of hard shell back rests (more than 3cm) is not permitted for any athlete. We understand the confusion over hard shell backrests which have upholstery, therefore Rule 2.7.10.1b clarification added that "If the backrest is upholstered with compressible material (as per rule 2.7.7) the maximum depth of the curve must still not exceed the depth of 3cm when the material is compressed"
		We allow cushions on hard backrests	Clarify wording to include cushion compression in the total curve measurement	
2.7.11	Visible Free Height	It would be very helpful to Jury Members if the Free Back Height was printed on the Bib so they don't have to access Licence every time to check it.	Add Free Back Height to Bib Template. Ref Appendix 4.	STC do not feel that this is necessary. This information is published on the athlete license card (along with all other information which must be checked) which is checked at equipment control and on the line.
2.7.11.3 - 2.7.11.5	Visible Free Height	Clarification needed	No more than one quarter of the athlete's torso (body) to be outside the backrest frame post. This would give a definitive position and no support to be gained from it.	In line with the new IPC Classification Code, changing this system will take extensive classification research. IPC Shooting will initiate research regarding trunk function and stability, and depending on the outcome of this research, future changes to the classification system may be proposed (after 2020). In the meantime, we recognise the challenges with the measurement of the Visible Free Height, and the Classification and Technical team are researching potential new methods that could help to uphold measurement consistency (by classifiers and technical officials) without subjective challenges.
		10 cm rule is always under the question as so many athletes are "illegal". It is not the same if you apply this rule to the "short" body or "tall" body.	Review this rule and may be go with the back length percentage instead of 10 cm, or delete this obligation.	
		This rule is not fair given wide range of heights of athletes	Revise the system to use a percentage of the distance from C7 to the seat, based on Classifiers' study	
		no backrest may be higher than 10cm below the armpit.	This rule needs to be changed. Take into consideration how tall the person is. If person A has a very short upper torso the 10cm rule will affect them adversely. On the contrary, if person B has a very long upper torso the 10cm rule could give them an advantage by allowing a higher backrest. A percentage of the length of the upper torso would be more fair.	
		I find this difficult to check as its measured/set, originally by Classification Staff without the Shooting Jacket being worn, but has to be checked with Jacket on. Jackets do not allow Gauge to fit under arm in same way as they do with jacket.	Review Rule, and agree how it can be checked.	

Article no.	Topic	Comment	Suggested Change	Comments
2.7.11.3 - 2.7.11.5, cont.	Visible Free Height, cont.	For athletes trunk function score C, a back support must be no higher than 10cm under the armpits does not take into account an athletes' individual anthropometry. For example an athlete who is 6 feet tall with a trunk height of 70cms is measured using the same 10cm rule to as an athlete who is 5 foot 2 inches tall and has a trunk height of 60cms. This rule is therefore unfair as it does not permit all athletes classified as a C back to compete equitably.	For athletes with trunk function score C, a back support should be no higher than spinous process level T6. The measurement should be determined in classification.	
		It is unfair to ask technical officials to undertake a measurement which involves identifying anatomical landmarks. It has been noted that there is frequently a discrepancy between the measurement placed on the jacket and what the classification card states.	A classifier shall measure visible free height. A classifier should be part of the equipment control panel.	
		Not sure where to put this request: It should NOT be up to coaches to protest obvious infractions of any rule. Currently there are numerous athletes clearly violating the 10cm rule in positon, reported because of mistakes on classification cards.	Empower TD and Jury to solve these problems before the competion starts.	
		All marks on the back of the shooting jacket always fall down.	The system when the mark will stay on, has to be made, so it will not be necessary to do it again and again.	
2.8.1.1	Shooting Tables (two or more tables)	The section in brackets (when joined/placed together) reads poorly to me. I interpret that to read that the two small tables can be telescoped apart greater than 90cm diameter while firing once they don't when joined together. It may just be pedantics on my part.	The two smaller tables while in use must not be larger than the 90cm diameter.	Rules to be rewored and reformatted to provide necessary clarification.
		It is a bit confusing.	No suggestion	
		"two or more" small tables are allowed	Clarify that one table is also legal	
2.8.4	Table (support)	Separate out section on not gaining stability on the left or right side as it applies to all positions. Wording could be miss-interpreted		Clarification to be added that U-form table are allowed only if the shape is wide enough that the left and right side of the athlete's abdomen cannot touch the table at the same time, and the table form fits within the 90cm diameter regulation. L-form tables are also permitted, provided that they fit within the diameter (90cm) regulations.
		Rules are unclear about shapes allowed	Clarify intent/meaning of the rules about shape and side support	
2.9.10	Spring stands	Only 20mm required to check in equipment control	shorten the required remaining length to 20mm	STC accept this proposal. A change will be made that the minimum length must be 20mm.
2.9.11.3	Yoke	I assume the material is not allowed to be compressible.		Not necessary to clarify, STC feel rule is clear.

### 3 Rifle rules

Article no.	Topic	Comment	Suggested Change	Comments
3.1	Event Timings	There is no mention of what timings will be used in Finals.	Add section that mentions Timings/Procedure for Finals. I don't believe that ISSF Procedures are completely ideal for IPC Competitions due to Athletes using Wheelchairs. I believe that overall ISSF timings can be used, however I believe that Athletes should be called to the line earlier and given at least five (5) minutes set up time, rather than the ISSF two minutes.	Clarification to be added (as 3.1.4 & 4.1.3) that ISSF rules and timings will be followed in all finals, with the exception of SH2 events when after athlete presentations the SH2 athletes will receive 2 minutes to get into position instead of 1 minute.
3.1.2	Event Timings	Timings for all SH2 Events are not consistent to SH1/ISSF. R4 is same time as R1, however R5 & R9 are ten minutes (10) longer than R3 & R6 respectively.	If intention of having longer time for R5 & R9 is because of using a loader, then R4 should also be longer. Otherwise suggest times should all be as SH1/ISSF.	STC discussed, and decided that no change is necessary.
3.1.2	Events and times	Due to the reason that SH1A and SH1B shooters use more shooting equipment, we suggest to increase time for Final round in R7 event: kneeling – prone – from 7 to 10 minutes, prone – standing – from 9 to 13 minutes.	Due to the reason that SH1A and SH1B shooters use more shooting equipment, we suggest to increase time for Final round in R7 event: kneeling – prone – from 7 to 10 minutes, prone – standing – from 9 to 13 minutes.	STC will not implement this change. Clarification to be added as 3.1.5 that coaches/assistants are permitted to assist their athletes in change overs, as this is the current practice (however, athletes must also be active in the changeover process).
3.1.3	Rifle rules, events and times	The rule 3.1.3. says that it is recommended that also in the event R3 (beside R4 in R5) at least every third firing point is left vacant.	There is no need for this rule. In the event R3 there is no loaders, shooting chairs and tables must fit into the shooting place, so no need to have every third place empty.	This rule is a recommendation only. Clarification to be added at end of 3.1.3 that "final decision on this matter will be made by the technical delegate."
3.2.1	Shooting Positions	No indication that only one button can be fastened whilst using a normal jacket in the kneeling position	Only one button on a normal jacket can be fastened up in the kneeling position SH 1.	We will elaborate the rules regarding how an ISSF standard jacket can be used (kneeling position, etc)
3.2.2	Rifle rules/ classification	In R6 and R3 events SH2A shooters those are allowed also to compete in SH1 class get additional advantage due to the reason they use both prosthesis and sling for shooting (use prosthesis as support and do not actually feel sling tension).	We suggest allowing only SH1 shooters to compete in R6 and R7 events.	IPC Shooting will make some medical research on this issue, to ascertain if there is any true advantage, before any decision could be made on this topic.

Article no.	Topic	Comment	Suggested Change	Comments
3.2.2.2	uneven arms	Sometimes arms are the same length but different shapes	Change "length" to "length or shape"	Changed to 'uneven upper limbs'.
3.2.2.5	SH1 Prone	Use of prothesis to support the rifle should not be allowed, it is unfair		IPC Shooting will make some medical research on this issue, to ascertain if there is any true advantage or not, before any decision could be made on this topic.
3.2.2.5 (d)	"Grip"	Do not allow active (sprung) grip	Do allow prosthetic to touch both sides of the stock if shaped so that prosthetic would drop off stock if unsupported	STC was unclear on this and asked author for more information on this matter.
3.2.2.6	Prone SH2	In prone and standing SH2 it is too often, that shooters touches with different parts of both arms, what is not allowed already by ISSF rules	(d) It is not allowed that any part of the arm touches the other arm.	In the clarification document we will add that ISSF rules 7.6.1.1 (n); 7.6.1.2 (k) and 7.6.1.3 (j) must be enforced.
3.2.2.6.c	SH2 Upper arms	Some athletes don't have elbows to separate an "upper" arm. Should they be allowed to rest some part of what arm they do have/	Consider options for those without elbows.	Clarification regarding allowance if athletes cannot rest both elbows on table will be added to next rulebook
3.2.3	Shooting positions/ standing	3.2.3.4 (a) clearly states that the rifle must be held with arms only, without support. Same time, some shooters may use shooting jacket as a mean of support while shooting, leaning back to wheelchair backrest with rifle.	We suggest allowing a maximum of 10 degrees elevation angle.	To touch the jacket (other than the right shoulder) with the rifle is not permitted, as per ISSF rule 7.6.1.3 (d) that "The rifle must not touch the jacket or chest beyond the area of the right shoulder"; this will also be added to the clarification document. No change will be implemented to limit the backrest angle.
3.2.3.2	Sideboards	Clarity needed, in 2.7.4 the statement is 'may not exceed the height of the curve of the wheel'		As per 2.7.4, it will be changed to state that sideboards are not allowed, regardless of wheelchair construction. (remove "unless sideboards are non-removeable", etc)
3.2.3.5	Standing SH2	In prone and standing SH2 it is too often, that shooters touches with difeferent parts of both arms, what is not allowed already by ISSF rules	(d) It is not allowed that any part of the arm touches the other arm.	In the clarification document we will add reminder that ISSF rules 7.6.1.1 (n); 7.6.1.2 (k) and 7.6.1.3 (j) must be enforced.
3.2.3.5	Positions		R4 (SH2) The rifle should be held with one hand, since the spring so replaces the second hand.	STC sees the logic in this recommendation, and will make some research into the viability of implementation, and to explore if athletes who are able to put second hand on the rifle are gaining unfair advantage.

Article no.	Topic	Comment	Suggested Change	Comments
3.2.3.5 (b)	De-shouldering	This is a good rule for SH2 Standing but should be applied to SH2 Prone also	Possibly should apply to SH2 Prone as well	STC feels there is no real need to implement this also for the prone position, as there is no deshouldering in ISSF-style prone position. Therefore the rule will continue to be implemented only in standing position.
3.3	Loading Assistants	Very often loaders are talking with the athletes and some of thea are the coaches giving instructions and adjusting the sights on their own.	No suggestions, but inforce the rules about what is perimted and what is not.	Clarification to be added that if the loader is also the athlete's coach, the athlete or coach must first ask permission of the range officer before speaking to each other.
3.3.3.1	Loaders communication	If loaders serve dual function they should be able to talk with the athlete	Clarify that loaders may get permission to speak as a coach with the athlete	

## 4 Pistol rules

Article no.	Topic	Comment	Suggested Change	Comments
4.1	Event Timings	There is no mention of what timings will be used in Finals.	Add section that mentions Timings/Procedure for Finals. I don't believe that ISSF Procedures are completely ideal for IPC Competitions due to Athletes using Wheelchairs. I believe that overall ISSF timings can be used, however I believe that Athletes should be called to the line earlier and given five (5) minutes set up time, rather than the ISSF two (2) minutes.	Clarification to be added (as 3.1.4 & 4.1.3) that ISSF rules and timings will be followed in all finals.
4.1.3	ISSF timing	ISSF rules do not allow sufficient time for wheelchair athletes in P3 to fully set up for the finals	Lengthen time to set up and require officials to assure that athletes are set before starting the clock.	In ISSF there is no fixed time limit in these circumstances. It is the job of the TD and Jury Chairman to discuss with the CRO that they are fully aware of the rules and have awareness for the potential flexibility of timing required for para-athletes to get set up on the range
4.1.4	P5 Events - Appendix 8 - 2.8.4.1 & 2.12.1	Rules refer to the Athlete raising their free hand, however, many IPC Pistol Shooters only have one hand.	Rule should be changed to add "or get the attention of the RO in some other way.	STC decided no requirement to change; if the athlete is not able to raise their free hand due to impairment, the RO or Classification Officer will see the problem and assist the athlete
4.1.4 (4.2)	Shooting Position - Appendix 8 - 2.2.1	Section 2.2.1 mentions athletes lowering his arm, but it does not say how far. It also says that the Pistol may be rested on the bench or shooting table. In the latest Judges Instructions & Clarification Document, under 7.5.2, there is mention that if the Bench is too high, then the 45 degree rule on "Ready Position" can be accepted as the lowest the shooter can achieve. Also 7.5.2.2 States that "In no case may the pistol rest on the Bench during the Ready Position". This is contrary to what the Appendix 8 says.	Appendix 8 needs to be clarified to say what is acceptable, and whether the pistol can or cannot touch the bench.	Rules are clear, also in ISSF rules
4.2.2	Sideboards	As above in 16		As per 2.7.4, it will be changed to state that sideboards are not allowed, regardless of wheelchair construction. (remove "unless sideboards are non-removeable", etc)

## 5 Falling Target events

Article no.	Topic	Comment	Suggested Change	Comments
5	Falling Target events	Not clear in rules regarding to the use of the scope and coaching	Clarify rules in regards to the use of the scope and coaching.	Rule to be clarified that no scope or coaching is allowed
5.1	targets	If falling targets are used, more needs to be done to ensure uniformity. Also do not allow an athlete to shoot on the same target in consecutive rounds as some are easier than others.	Change startlist procedure to assure randomness in round 1 and that athletes must use different lanes in consecutive rounds. Jury should track which lanes were more successful statistically.	Change process so that a fresh draw in made after every round, to avoid this problem
5.1	Competition Format	Not clear in rules regarding to the use of the scope and coaching	Clarify rules in regards to the use of the scope and coaching.	Rule to be clarified that no scope or coaching is allowed
5.1.4.4	shoot off	Need to clarify that to break a tie in pistol the far "LEFT" target is used, not the far right target (used in rifle shootoff)		This is already clarified in IPC SH rule 5.1.4.4 (b)

## Appendices

### ▪ Appendix 7 (SH2 Support Stand)

Article no.	Topic	Comment	Suggested Change	Comments
Appendix 7 page 1	Minimum length of 40mm of the base of lower part of stand	The reason for the 20.8mm dia and 40mm length of the bottom of the lower part is to allow it to be inserted and retained in the support stand measuring device to check the spring. The measuring device is 20mm thick so therefore as long as any part of the lower part of the support stand protrudes it will be able to be checked.	Minimum length of 25mm of lower part of support stand	Add change that minimum length must be 20mm.

### ▪ Appendix 8 (P5 10m Air Pistol Standard)

Article no.	Topic	Comment	Suggested Change	Comments
2.4	clarification	before each series?	clarify what is meant by "before each stage"	Ok, we will replace 'stage' by 'series'
2.9.2	Scoring, ties	currently shoot off is used to break ties, why?	use "x" count to break ties in first 3 positions	add 2.9.2.1: One sighting series in 10 seconds of 5 shots, followed by 1 series of 10 seconds of 5 shots, until the tie is broken (for first to 3rd place). Also separate ties for 4th and below out to become 2.9.2.2
2.11.1	Disturbance	We had an issue with a pistol shooter who only had one arm. He did indicate the disturbance by turning his head and making it obvious something was wrong. Hence rule should be modified to accommodate this set of circumstances		No requirement to change; if the athlete is not able to raise their free hand due to impairment, the RO or Classification Officer will see the problem and assist the athlete