

6 August 2026

Submissions at Strategy and Support
Department of Police, Fire and Emergency Management
GPO Box 308
Hobart Tas 7001

Via email: submissions.strategy.support@DPFEM.tas.gov.au

Dear Sir/Madam

Thank you for the opportunity of making this submission at an important time for firearm reform in Australia, and especially Tasmania.

Tasmania holds a special place in the Foundation's origin and firearm reform has been central to the work of our Founder Walter Mikac AM. With the tragic events of Bondi in December last year, the issue has also been raised in the public's consciousness and all First Ministers agreed to develop options to reduce firearm harm in their States and Territories.

Tasmania continues to hold a disproportionate number of firearms per capita in Australia and a corresponding rate of theft is concerning for all Tasmanians. This Amendment Bill goes some way to strengthening firearm management in Tasmania, but in our submission, we have called for more action from the Tasmanian Government.

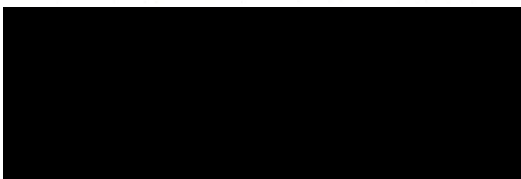
We understand that these are difficult decisions for government with strong head winds from interested parties. But we are reminded of the efforts of Prime Minister John Howard in 1996. In his memorable speech in Sale, Victoria he said, *"there come occasions for any Government to take decisions which can only be effectively implemented in the interests of the overall national good. If they involve some disproportionate inconvenience and some disproportionate deprivation for one section of the community, I'm sorry about that. But there is no other way that we can achieve the objectives. And it is always, my friends, it is always the responsibility of a Government to weigh up the gains and to set them against the losses."*

We have offered some wording changes to the Amendments, have sought some clarification and stated where we oppose amendments to the *Firearms Act 1996*. We have also made recommendations for a number of additions to the Bill.

We hope our submission is helpful and that the government takes on board the views of the Foundation and other firearm safety advocates.

We look forward to continued engagement with the government on this important work.

Yours faithfully,



Chief Executive Officer



alannah &
madeline
foundation

Firearms Amendment (Miscellaneous) Bill 2026

Submission by
the Alannah & Madeline Foundation

August 2026

For their right to be safe

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Executive summary

The Alannah & Madeline Foundation welcomes the opportunity to make this submission on the *Firearms Amendment (Miscellaneous) Bill 2026*. Tasmania has a unique place in Australia's firearm reform history, and the core principle of the National Firearms Agreement remains clear: firearm possession and use are a privilege conditional on public safety.

The Foundation supports measures in the Bill that strengthen firearm management, including the National Firearms Register, reclassification of certain firearms, improved verification processes and stronger provisions relating to domestic and family violence.

However, the Bill remains incomplete because it does not adequately address Tasmania's disproportionate firearm burden, high rates of firearm theft, or the need to limit individual firearm holdings.

Tasmania has approximately 157,000 registered firearms, nearly twice the national average per capita. At least 971 firearms were stolen between 2018 and 2024, and recent police data shows 155 firearms stolen in the year to May 2026, with only 19 per cent recovered. Firearm theft is a major pathway into the illicit market and creates foreseeable risks for police, victims of family violence, children and the broader community.

Our submission's central recommendation is that Tasmania introduce a clear legislative limit on the number of firearms an individual can own, with strict and transparent exemptions for genuine occupational, primary production, collector, dealer or high-level sporting needs. This would give effect to National Cabinet's post-Bondi commitment to consider firearm ownership caps while preserving legitimate firearm use.

The Foundation also strongly opposes any amendment that would remove existing limits on Category C firearms. Reclassified firearms should be removed from circulation where appropriate, not shifted into larger private holdings.

The Bill should also be strengthened by establishing a statutory Firearms Consultation Committee; requiring a genuine reason to be established and reviewed for every firearm and permit to acquire; extending firearm licence exclusion periods to 10 years after domestic violence orders or violent offences; and inserting an Objects or Purpose clause in the *Firearms Act 1996* that makes public safety the overriding consideration of the Act.

The submission also calls for stronger recognition of children's safety. Allowing children as young as 12 to use firearms is inconsistent with the National Firearms Agreement, child safety principles and public health advice concerning lead exposure at shooting ranges.

Overall, the Bill is a useful but incomplete step towards strengthening firearm management in Tasmania. The Tasmanian Government should strengthen it so that public safety, not convenience or commercial interest, is the clear and overriding purpose of firearm legislation and regulation in Tasmania.

The Alannah & Madeline Foundation

The safety of children and young people is why we are here. Our child-rights framework informs everything we do.

It drives our mission to see all jurisdictions compliant with the Australian National Firearms Agreement through the Australian Gun Safety Alliance (AGSA).

It sees us advocate for the rights of children and young people to be upheld online and offline, including by governments and digital platforms, and for optimal safety standards to be built into all digital spaces and devices.

And it means advocating for children to be formally recognised as victims of crime.

We believe the needs of children should always be part of government policy and that all government decision-making should consider the best interests of the child, first and always.

We believe that the voices of children and young people should be actively sought out and prioritised whenever decisions are being made that affect them. It is their right. And our ongoing mission to make it happen.

Background to gun laws in Tasmania

Prior to 1996 mass shootings were distressingly common in Australia. In the 18 years up to Port Arthur, there had been 13 mass shootings with 104 victims killed and at least 52 wounded.

In 1987, after a National Gun Summit was convened by Prime Minister Bob Hawke, the New South Wales Premier Barry Unsworth complained that it *"would take a massacre in Tasmania for our gun laws to change."*¹. In the 10 years prior to 1996, Australia's Police Ministers Council had met around 30 times, and gun reform had been on every agenda. The APMC had commissioned 11 expert reviews & reports recommending gun reforms and nothing was done.

The first Tasmanian *Firearms Act 1932* only regulated handguns via licensing and registration. Long arms (rifles and shotguns), including automatic and semiautomatic firearms were unregulated, required no safety training, testing or storage. The *Guns Amendment Act 1988* required owners or users of automatic firearms to be licensed but it was never proclaimed. In 1990 the Firearms Control Bill failed to pass the Tasmanian Parliament.

The Guns Bill 1991 was introduced and proclaimed on 1 January 1993². Although nowhere near as strict as the post Port Arthur reforms, it did introduce licensing and testing; require applicants to be at least 18 years old; require some gun safety knowledge and assessment as a fit and proper person.

Within 10 days of the Port Arthur tragedy, Australian jurisdictions had agreed to a national buyback of newly prohibited automatic and semiautomatic firearms and agreed to a minimum set of requirements for the use and possession of a firearm - the National Firearms Agreement (NFA). Tasmania, along with all jurisdictions introduced their *Firearms Act 1996* to legislate the minimum requirements agreed in the NFA.

There has been much written about the impact of the gun reforms introduced in 1996. Deaths from firearms have halved since 1996, this is for both homicide and suicide. In 2010, Andrew Leigh and Christine Neill³ found *"the buyback led to a drop in the firearm suicide rates of almost 80%, with no significant effect on non-firearm death rates. The effect on firearm homicides is of similar magnitude but is less precise"*. In 2019, researchers⁴ using an insurance modelling of unlikely events estimated that without the intervention of gun reforms in 1996 Australia could have expected to have had 16 mass shooting events between 1996 and 2018.

Australians have been proud of our strong gun laws which have kept our gun death rate (per 100k people) less than 10% that of the USA. The tragic Bondi shootings awakened the community's awareness that our gun laws had not kept pace with firearm technology, ownership patterns, commercial interests, marketing and inertia of government legislation.

¹ [Over-our-dead-bodies_Chapman.pdf](#)

² <https://www.aic.gov.au/sites/default/files/2020-05/28-91.pdf>

³ <https://academic.oup.com/aler/article-abstract/12/2/509/99272>

⁴ [Association Between Gun Law Reforms and Intentional Firearm Deaths in Australia, 1979-2013 - PubMed](#)

Firearms in Tasmania

There are approximately 157,000 firearms registered in Tasmania.⁵ Only the Northern Territory has more firearms per capita than Tasmania, which has nearly twice the number of firearms per capita across the country. Tasmania clearly has a large rural population, but this alone does not count for the disproportionate ownership patterns.

In correspondence from Police Commissioner Adams⁶, published in February 2026, the Commissioner states *"Firearms present a real and increasing threat to both the public and our officers. The murder of Constable Keith Smith on 16 June 2025 was a confronting reminder that the presence of a firearm can change the outcome of even the most routine policing task."*

The Commissioner goes on to say *"In terms of policy and legislative change, I reiterate my support for the national firearms reform agenda, including a proposed firearms cap."*

National reforms following Bondi

Tasmania participated in an urgent National Cabinet meeting called on 15 December 2025. According to the official Communique⁷, First Ministers, including the Tasmania Premier, agreed to strengthen gun laws across the nation and commissioned their Police Ministers and Attorneys-General to develop options, including:

- accelerating work on standing up the National Firearms Register
- allowing for additional use of criminal intelligence to underpin firearms licencing that can be used in administrative licencing regimes
- limiting the number of firearms to be held by any one individual
- limiting open-ended firearms licencing and the types of guns that are legal, including modifications
- a condition of a firearm license is holding Australian citizenship.

Royal Commission on Antisemitism and Social Cohesion

The Royal Commission handed down their interim report in April 2026. Among the recommendations were:

- Recommendation 13: The Commonwealth and states and territories should prioritise efforts to finalise and implement an updated and nationally consistent National Firearms Agreement.
- Recommendation 14: The Commonwealth, states and territories should prioritise efforts to implement the proposed National Gun Buyback Scheme.

Firearm theft in Tasmania

In addition to having twice as many guns per capita than the Australian average, Tasmania also has more than twice the number of firearms thefts per capita. The Australia Institute⁸ report showed that at least 971 firearms were stolen in Tasmania from 2018 to 2024. It also found that Tasmania accounted for 6.9% of firearms stolen nationally from 2018 to 2024, despite having just 2.1% of Australia's population. A report⁹ on 24 July 2026 shows that according to Tasmania police data there were 40 firearms theft incidents between June 2025 and May 2026 with a total of 155 firearms stolen. Only 29 or 19% of the stolen firearms have been recovered.

According to police, the terrifying assault and burglary at Coles Bay¹⁰ in July 2026 was for the purpose of firearm theft. At the time of preparing this submission, there are still at least 15 unaccounted firearms in the community as a result of that one burglary. That puts police and the broader community at risk.

⁵ [Plea from Tasmania's police commissioner for limit on gun ownership knocked back by government - ABC News](#)

⁶ [ibid](#)

⁷ [Meeting of National Cabinet | Prime Minister of Australia](#)

⁸ [P1893-Firearm-theft-in-Australia-Web.pdf](#)

⁹ [Tasmania's firearm theft crisis: what the new data reveals | The Mercury](#)

¹⁰ [Three men charged over alleged Coles Bay robbery and arson in which man had to watch home burn down - ABC News](#)

The Australian Criminal Intelligence Commission has found that theft is the primary contemporary diversion method for firearms into the black market¹¹. While data on the relationship between the number of firearms in the home and theft is limited, the incentive for criminal targeting is clear when multiple weapons are stored in a single premises. Interviews with persons convicted¹² of serious gun-related crimes demonstrate that theft is a routine practise for criminals – “every farmer has a shotgun”.

While this Firearms Amendment Bill strengthens sanctions for firearm theft, there is an indisputable fact that large caches of weapons, regardless of the owner’s genuine reasons to have them, provides increased targets for those seeking to obtain them illegally.

Limiting firearms in Tasmania

Firearms regulation in Tasmania must start from the simple principle that the use and possession of firearms is a privilege that is conditional of public safety. That principle sits at the heart of the National Firearms Agreement established after Port Arthur. It has been reinforced by National Cabinet after Bondi. It should now guide decisions about firearm policy in Tasmania.

Limiting the number of firearms that any one person may possess is a practical, proportionate and evidence-based reform. It would reduce the overall burden of firearms in the community, lower the risks associated with theft, misuse, suicide and family violence, and bring Tasmania more closely into line with the public safety purpose that underpins modern firearm laws.

The case for limits is not that every licensed firearm owner presents the same risk. Most do not. The case is that public safety laws are designed to reduce foreseeable risks across a whole system, not simply respond after harm has occurred. Seatbelts, pool fencing, tobacco controls, alcohol regulation, gambling restrictions and road safety rules all work on the same logic: where a product or activity can cause serious harm, governments reduce risk by limiting access, strengthening safeguards and preventing foreseeable danger.

Firearms are no different. They are lethal by design. Their presence increases the risk when associated with an impulsive act, a domestic violence incident, a mental health crisis, a theft or any criminal act. Reducing the number of firearms held in private hands reduces the means by which harm can be caused. That is not an ideological position; it is the logic of prevention.

Firearm limits do not prevent a single firearm user pursuing their hobby, sport or job. It only adds additional protections around the person’s privilege of using a firearm.

Tasmania has a particular reason to act. The state carries one of the highest firearm burdens in the country and has experienced high rates of firearm theft. Large private collections multiply that risk. Even where an owner is responsible, the public safety exposure increases with the number of firearms held. A cap would not prevent genuine need. Well-designed limits can include exemptions for primary producers, occupational users, collectors, dealers, clubs and high-level sporting shooters where a clear and verifiable reason exists. The purpose is not to punish legitimate use. It is to require a stronger public safety justification as the number of firearms in one person’s possession grows.

This is a modest reform. The Police Commissioner has indicated that about 9,000 people in Tasmania own more than six firearms. Many of those people may already have clear occupational, primary production or sporting reasons for doing so. The number likely to be directly affected by a reasonable cap is estimated to be less than 1% of the Tasmanian population. Public policy should weigh the interests of those individuals against the safety expectations of the broader community. When the potential consequence of weak regulation is injury or death, the wider public safety interest must prevail.

The strongest argument for limits is prevention. Firearms policy should not wait until a person becomes a criminal, a terrorist, a family violence perpetrator or a suicide risk before it acts. The purpose of licensing, registration, storage rules and genuine reason tests is to prevent danger before it materialises. Caps are

¹¹ [illicit_firearms_in_australia.pdf](#)

¹² <https://doi.org/10.1080/01639625.2022.2086838>

consistent with that framework. They recognise that accumulation itself can create risk and that, beyond a reasonable point, the public should expect a higher threshold of justification.

The evidence from other public health experiences is clear: reducing access to harmful products reduces harm. This principle has shaped successful reforms in tobacco control, alcohol licensing, road safety, gambling regulation, workplace safety and injury prevention. Firearm regulation belongs in the same category. It is not enough to rely on personal assurances that people will “do the right thing”. Effective public safety systems are built because even well-intentioned individuals can make mistakes, circumstances can change, and systems must guard against foreseeable failure.

In the USA, states with the highest gun death rates are typically those where gun laws are weaker and firearm ownership is higher. By contrast, gun death rates are significantly lower where gun violence prevention laws are stronger¹³. An editorial in the British Medical Journal ¹⁴ summarised experiences across multiple states and confirmed that jurisdictions with tighter firearm regulation experience fewer firearm injuries and deaths. Similarly, a National Bureau of Economic Research 2001 paper found unequivocally that “fewer guns mean fewer gun homicides.”

Australia’s success after 1996 rested on a national decision to treat firearms as a public safety issue, not merely a private ownership issue. That settlement should not be weakened by allowing unlimited accumulation without a clear public safety rationale. If a person can lawfully hold 10, 20, 50 or more firearms, the community is entitled to ask why that level of access is necessary and how it advances public safety.

Tasmania should adopt a firearm limit because it is consistent with the core purpose of firearm law: preventing harm before it occurs. It would not end legitimate firearm use. It would simply require that larger private holdings be justified against the standard that matters most: public safety.

The question is not whether every licensed owner is dangerous. The question is whether unlimited firearm accumulation is necessary, proportionate or safe. On any sensible public safety test, the answer is no. A reasonable limit on firearms is a measured reform that would reduce risk, strengthen accountability and help ensure Tasmania’s firearm laws serve the whole community, not only those who own firearms.

¹³ <https://publichealth.jhu.edu/sites/default/files/2025-06/2023-cgvs-gun-violence-in-the-united-states.pdf>

¹⁴ [More gun regulation, less firearm harm | The BMJ](#)

Response to Firearms Amendment (Miscellaneous) Bill 2026

Consultation Questions and Answers

We generally support most of the amendments that have been proposed in this Bill. However, we believe further steps are needed to address a number of omissions, change some wording, and answer some questions about certain Amendments.

For brevity, we have deliberately not covered every paragraph in the consultation documents.

Broadly, what does the Bill do?

We feel the Bill goes some way to address many shortcomings in the management of firearms in Tasmania.

However, we are concerned over what the Bill does not address. Following the Bondi tragedy, all Premiers agreed to consider options that limit the number of firearms that individuals can own. But as far as we can ascertain no options to limit firearms have been developed or considered for inclusion in this Bill.

The Police Minister has ignored the advice of the Police Commissioner, of firearms safety advocates and the wishes of the majority of the Tasmanian population. The Minister has also ignored the consultation process established with the formation of the Firearm Consultation Committee.

The Tasmanian population would reasonably expect some transparency over what options were considered, who was consulted, and on what basis did the government dismiss all options to limit firearms in Tasmania.

What does the NFR do?

We support the introduction of a National Firearms Register. It is one of the final planks to the 1996 National Firearms Agreement that is yet to be implemented. We are on the National Stakeholder Panel and communicate regularly with the Department of Home Affairs on the NFR.

Tasmania should treat the National Firearms Register as a major public safety reform and ensure appropriate resources are allocated to meet the aggressive timelines.

What types of firearms are going to be reclassified?

We support the reclassification of a type of firearm that was never anticipated by the NFA. We note that the definitions are in the main similar to New South Wales and other jurisdictions which are progressing their reclassification processes. This is an important step to ensure national consistency.

What will happen if I own a reclassified firearm and I am not eligible for a Category C licence?

There have been confusing messages from the government about their participation in a gun buyback scheme. There have also been confusing messages about effectively incentivising firearm owners by paying a premium for reclassified firearms rather than expecting law-abiding firearm owners to follow the law when some of their firearms are re-classified.

What changes relate to Domestic Violence Orders?

We support any strengthening of laws associated with domestic and family violence matters. We know that firearms are still responsible for around 11% of domestic homicides and increasingly reports of firearms used as coercive methods of controlling women.

We also recommend an increase in the firearm licence exclusion period from 5 years to 10 years after the expiration of a DVO.

Citizenship

All jurisdictions are addressing this undertaking that emerged from National Cabinet and we support the amendments in the Bill.

How are firearms dealers able to verify the currency and validity of a firearms licence (what's changing)?

We agree with the improved ability of firearm dealers to verify using an improved digital interface with a National Firearms Register.

We also believe that if it isn't already in place, the Bill should ensure all employees with access to the system have passed the Fit and Proper Person test.

Why are changes being made to borrowing and lending?

Some clarity about this. A lender **should not** be able to check on another person's licence validity. The borrower should be able to have a secure access to their own data to verify to the first person. The system should not enable a person to interrogate the system under the guise of verifying another person's firearm licence status.

We also understand that there are offences if an unlicensed person borrows a firearm. There should also be an offence for lending a firearm to an unlicensed person. Both parties should be prosecuted if safe storage requirements by the borrower are breached.

Comments on the wording of Amendments

Section		Comments
5.	Section 3 amended (Interpretation)	
	<i>handgun shooting club</i> means an approved shooting organisation that conducts or organises handgun shooting competitions;	Insert approved.
	<i>range</i> means approved premises used for sports or target shooting other than with a paintball firearm within the meaning of Part 6A	Insert approved.
	<i>rifle shooting club</i> means an approved shooting organisation that conducts or organises rifle shooting competitions;	Insert approved.
9.	Section 15 amended (Category B firearms licence)	
	(iii) is not a straight pull action firearm or a button or lever release firearm; and	Should this also include "pump action"?
10.	Section 16 amended (Category C firearms licence)	
	(d) straight pull action firearm; and (e) button or lever release firearm.	Should this also include "pump action"?
12.	Section 19A amended (Firearms dealer employee licence)	If not already the case, all employees of firearm dealers should pass the fit and proper test regardless of whether they have/want a firearm licence.
14.	Section 28 amended (Applications for licences)	
	(c) by omitting from subsection (2)(b) "in accordance with the requirements under the Financial Transactions Reports Act 1988 of the Commonwealth that apply in respect of the opening of a bank account" and substituting "in an approved form";	It is not clear what ID requirements will now be needed.
15.	Section 29 amended (General restrictions on granting licence)	
	(b) whose genuine reason for holding the licence is a reason specified in section 28(1)(d)(ii)	Not clear what 28(1)(d)(ii) is.
	(3) The Commissioner must not grant an application for a licence to a person who – (a) within the period of 5 years before the application was made, has been convicted in Tasmania or elsewhere of any crime involving violence to another person, whether or not the crime is a crime under a law of Tasmania; or (e) by omitting from subsection (3)(e) "criminal intelligence report or other criminal information" and substituting "intelligence report or other information";	Recommend that this be increased to 10 years. Does this give enough scope for Auscheck or equivalent? Also, the term "held" – if Auscheck only returned a positive or negative determination, does this clause cover that circumstance?

16. Section 36A amended (Renewal of licences)	
(4) Despite subsection (3)(a), the Commissioner may accept an application for the renewal of a licence even if the applicant does not meet the requirements of that paragraph, if the Commissioner is satisfied that it is reasonable in the circumstances for that paragraph not to apply to the applicant.	This provides a very subjective approach that will change with every Commissioner.
18. Section 37 amended (Genuine reasons)	
Insert (i) a reason prescribed as being a genuine reason to possess or use a firearm.	STONGLY OPPOSE There should not be a "contingency" category for a future Minister or Commissioner to include a new Genuine Reason. A genuine reason should be required and reviewed for every firearm.
21. Section 51 amended (Cancellation of licence)	Does this cover DVO in any jurisdiction?
40. Section 121A. Lending and borrowing of firearms	
(2) A person must not lend a firearm to another person without – (a) seeing and verifying that the other person holds a licence or permit under this Act that authorises the person to have possession of the firearm; and (b) ensuring that the other person – (i) has the means to comply with the storage requirements under this Act in respect of the firearm; and (ii) intends to comply with those storage requirements.	We see an issue with "verifying". The lender should not be able to access database. This does not put enough responsibility on the <i>lender</i> to ensure safe storage.

Suggested inclusions in the Firearms Amendment (Miscellaneous) Bill 2026

1. Limits on the number of firearms an individual can own

Tasmania should adopt a reasonable limit on the number of firearms any one person may possess because firearm ownership is a conditional privilege, not an unrestricted right. The central purpose of firearm regulation is public safety and harm prevention, consistent with the National Firearms Agreement established after Port Arthur and reaffirmed nationally after Bondi.

The Tasmanian Premier along with all First Ministers agreed to develop options to limit the number of firearms an individual can own. To date, the government has not shown any options.

Limits on firearm numbers are a practical and proportionate reform that reduce the risks associated with theft, misuse, suicide, family violence and criminal access. The argument for limits does not depend on treating all licensed firearm owners as dangerous. Rather, it recognises that public safety laws are designed to reduce foreseeable risks across the whole system before harm occurs. Firearms are lethal by design, and the presence of multiple firearms increases the potential consequences of a mental health crisis, domestic violence incident, theft, impulsive act or criminal misuse. Larger private collections create greater exposure, even when owners are responsible.

Tasmania has a particular reason to act because it has a high firearm burden and has experienced significant firearm theft. A cap would not prevent any firearm owner from pursuing their hobby, sport or job. A strict exemption regime would enable some groups from exceeding the cap. The Police Commissioner has indicated her full support for a cap and shown how a tiny percentage of the Tasmanian population would be affected.

The broader prevention principle is supported by public health experience: reducing access to harmful products reduces harm. Firearm regulation should operate in the same way as road safety, tobacco, alcohol, gambling and workplace safety controls. A reasonable firearm limit would not end legitimate use; it would ensure larger holdings are justified against the community's overriding interest in safety. The key question is not whether every licensed owner is dangerous, but whether unlimited accumulation is necessary, proportionate or safe. On a public safety test, it is not.

2. Tasmania Firearms Consultation Committee

The requirement for a Firearm Consultation Committee should be included in the Bill. The Bill should require that Terms of Reference, appointment processes, appointment terms etc are developed within six months of Assent.

It has been a disingenuous process to stand up a Committee for two meetings to effectively rubber-stamp decisions of the Minister.

3. Genuine reason

A genuine reason should be required and reviewed for every firearm and every PTA.

4. Licence exclusion period

Currently, the Commissioner must not grant an application for a licence for a period of five years after a crime involving violence to another person or a DVO. To strengthen public safety, we recommend that be extended to 10 years as it is in New South Wales.

5. Insert Objects or Purpose in the *Firearms Act 1996*

Tasmania is the only jurisdiction that does not include a Purpose or Object in their Firearm Act. A quick review of current Tasmanian legislation shows that most have a clear Purpose or Object. This would clearly put public safety at the centre of firearm management in Tasmania as it does in every other Australian jurisdiction.

Without the Purpose of the Act being for public safety, the legislation reverts to being for the administration of firearms and firearm owners. Public safety needs to be at the heart of the legislation, not firearms.

Examples from other jurisdictions are shown in the following Table.

Jurisdiction	Purpose / Objects / Principles
Commonwealth National Firearms Agreement	Firearms possession and use is a privilege conditional on public safety. Public safety is improved through safe possession, use, registration, storage and transfer of firearms.
New South Wales	Principles: firearm possession and use is a privilege conditional on public safety; improve public safety through strict controls and safe storage; facilitate a national approach. Objects include prohibiting most self-loading firearms, establishing licensing and registration, requiring a genuine reason, strict acquisition controls, and secure storage and transport.
Victoria	The purposes of this Act are— (a) to give effect to the principle that the possession, carriage, use, acquisition and disposal of firearms are conditional on the need to ensure public safety and peace by—
Queensland	(1) The principles underlying this Act are as follows— (a) weapon possession and use are subordinate to the need to ensure public and individual safety; (b) public and individual safety is improved by imposing strict controls on the possession of weapons and requiring the safe and secure storage and carriage of weapons. (2) The object of this Act is to prevent the misuse of weapons.
Western Australia	Principles: overriding need to ensure public safety; firearm possession is a privilege conditional on public safety; strict controls ensure safe and responsible possession.
South Australia	Principle that firearm possession and use is a privilege conditional on the overriding need to ensure public safety.
Australian Capital Territory	to confirm firearm possession and use as being a privilege that is conditional on the overriding need to ensure public safety; and
Northern Territory	Regulates the possession, use, licensing, registration, acquisition and transfer of firearms, requiring genuine reasons for possession and establishing controls designed to protect public safety.

6. Children's legal use of firearms

Tasmania continues to contravene the National Firearms Agreement by allowing children under 18 to legally use firearms.

The current Act provides no justification or explanation for permitting 12-year-old children in Tasmania to lawfully use a firearm, nor how such permission could be considered consistent with the primary principle of the National Firearms Agreement, which is to protect public safety. The firearm industry has advanced spurious arguments suggesting that handling a firearm equips children with otherwise unattainable life skills – based on no such evidence. It has also been claimed that farmers rely on children to euthanise stock – overlooking the explicit legal requirement that any such activity must occur under direct supervision of a licensed firearm owner, presumably one that could carry out whatever duty they were expecting their child to undertake.

For context, a 12-year-old cannot legally drive a motor vehicle, even under supervision, and a 15-year-old is prohibited from holding a Facebook account. It is therefore difficult to conceive how it could be in the public interest to allow children to legally use firearms.

Furthermore, the use of firearms by children in an organisational setting – such as a shooting range – would raise serious concerns under Tasmania's Child Safe Standards¹⁵, including *Standard 8: Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed*.

In addition, there is another compelling public-health rationale for limiting children's access to firearms. Health departments across the country advise that children should not attend shooting ranges, which are well-established sources of lead contamination.

Investigations into lead contamination¹⁶ at shooting ranges concluded that *"It is the norm, rather than the exception, that shooting ranges are contaminated with lead."*

The Western Australia Health Department¹⁷ advises that individuals who use firearms, handle ammunition or visit shooting ranges are at increased risk of lead exposure. It is recommended that children do not attend shooting ranges and firearm users take precautions to ensure their clothes and skin are free from any lead particles before hugging children or handling toys.

Similarly, the South Australia Health Department¹⁸ explicitly recommends *"Avoid taking young children to shooting ranges."* An international review¹⁹ found *"Women and children are among recreational shooters at special risk"* and *"Thus firing ranges, regardless of type and user classification, currently constitute a significant and unmanaged public health problem."*

Even the Sporting Shooters Association of Australia²⁰ agrees that *"A variety of potential contamination risks exists at sports shooting ranges – the most concerning for human health and environment is lead from the spent projectiles."*

Once again, public safety must guide firearm policy in Tasmania, and the significant issue of lead contamination must be expressly considered.

¹⁵ <https://oir.tas.gov.au/child-and-youth-safe-standards>

¹⁶ <https://lead.org.au/fs/shootingranges.pdf>

¹⁷ https://www.healthywa.wa.gov.au/Articles/J_M/Lead-exposure-and-firearms-use

¹⁸ <https://tinyurl.com/yvyk926>

¹⁹ <https://ehjournal.biomedcentral.com/articles/10.1186/s12940-017-0246-0>

²⁰ <https://www.morphum.com.au/all-projects/environmental-management-plan-for-the-ssaa>