

Subject: Firearms Amendment (Antique Firearms) Bill 2025



Thank you for inviting The Arms Collectors Guild of Tasmania Inc. to provide our submission to the Firearm Amendments (Miscellaneous) Bill 2026

Redacted

7th of August 2026

1. The Guild strongly support targeted, evidence-based legislation that improve public safety against those who would criminally misuse firearms. Action against those who would steal, illicitly traffic, possess and misuse firearms should be strong with appropriate sentencing.

2. It seems to us that some of the proposed amendments affect legitimate firearm owners while having no impact on those who pose the greatest threat and are prepared to break the law, be they criminals or extremists. They do not obtain firearms through the lawful licensing system (unless that fails such as at Bondi) nor comply with Firearm Legislation. Therefore, proposed legislation would be better created to focus on criminals, improve intelligence, co-ordination and improving law enforcement. Finally, target those who present a genuine threat to community safety rather than additional controls on those legitimate licenced firearm owners who already comply with licencing conditions.

a. Failures in management and intelligence gathering against terrorists and criminals should not be used as a basis for action against law abiding firearm owners.

3. This legislation appears rushed, as we do not believe we have a detailed picture regarding the Bondi antisemitic attack; its causes and failures to prevent it, for a proper public discussion and proposals on outcomes at this time.

b. Emphasis should be on those changes in legislation that have evidence for an appropriate result

4. To use the nebulous term 'public safety' as a reason for introducing legislation - that effects licenced firearm owners, is to do so without the evidence presented that this legislation will achieve the desired aim. As previous reports from the Australian Institute of criminology has revealed Licenced firearm owners are not responsible for the

vast majority of firearm crime, that firearm crime is reducing in percentage per population terms, that firearm theft is decreasing in percentage terms when taking into account the overall increase in firearms numbers.

c. There is no link between firearm numbers, Licenced firearm owners and firearm crime

5. We are concerned that this legislation as proposed would result in firearm owners forced to have their firearms purchased by the state without a finalised buyback scheme or details provided on how it would work. We are also concerned that firearm accessories such as firearm magazines that are proposed to be banned appear to not been included in this buyback, or at least this has not been reported, and that owners would therefore not be compensated.

d. We do not believe this legislation should be proceeded with or enacted until a fair & detailed compensation scheme is finalised for public dissemination, feedback and with a reasonable implementation time-frame

6. The blanket move of straight pull bolt action centre-fire rifles from Category B to C is an over-reaction. Straight pull bolt action rifles have historically been in use from the late 19th century however due to design disadvantages such as complexity and an inclination to failure in extreme conditions where superseded by conventional and more reliable bolt actions. The mooted advantages of a straight pull bolt action did not appear in field use and did not justify the extra expense or use.

7. Examples of straight pull bolt action firearms of the early smokeless era owned in Tasmania are the Steyr M1895 rifle, Mannlicher 1886,88,90 and Swiss Mannlicher 1893, Schmidt Reuben series of rifles from 1889 through to 1958, Lee Navy 1895 and the Ross 1903, 1905 and 1910 military rifles and all have target rifle and sporting versions for hunters. They have been owned in Tasmania by target shooters, hunters and collectors without issues up until the present. To say that they are more deadly than other military based firearms from this era illustrates a lack of knowledge & expertise. In range use no straight pull military rifle has ever won the Guilds rapid fire competitions and in the author's experience - Redacted and fired all others, the opposite applies as to their speed of use. These are bolt action rifles similar in use to all others!

e. The Guild believes that these straight pull rifles should not be recategorized to Category C as no evidence to do so exists and no improvement in public safety will occur if such a move was accomplished.

8. Licence verification to ensure a firearm can be loaned to another Licensee is a laudable goal however not until the NFR portal is in operation. We do not believe that this section should be enacted until then as methods to verify licences are not in place for a 24-hour service. We have concerns with the NFR security of data to be accessed

and what controls that will be in place to prevent a criminal from accessing it. With multipole hacking events occurring regularly and AI a looming complicating security issue it is difficult to take statements that this will not happen with any credibility. Security of our data is one of the most concerning issues to our members.

f. Support Licence verification to be implemented when the NFR portal is in place and secure

9. The requirement that a licensee is to ensure that to loan a firearm, the licensee receiving it has the correct storage is not workable without some type of advisory system on the storage level of that Licensee. We believe that this should be in the form of a certificate from Tasmania Police; issued when the storage was inspected, that can be sighted when the firearm is loaned. The serial number of the certificate can then be recorded as evidence that a Licensee has confirmed the storage is approved. This certificate would also serve the dual purpose that the storage is certified correct for any future inspection.

g. Propose the introduce a certificate of storage compliance after storage inspection

10. The requirement to notify Tasmania Police that a licence holder has moved at 24 hours prior or no later than 24 hours after the move is impractical. As anyone who has moved regularly will attest this is a particularly challenging and stressful time. At present notification cannot be achieved over a weekend or public holiday when Firearm Services and Service Tasmania is closed – and as many move over Christmas holidays it may not be possible for many days at this time. Sending an email to an unmonitored site will not achieve the stated aim of this proposal. The suggestion that this will eventually be done through the NFR will not help those without computer access or skills.

h. We believe that the notification time to notify Tasmania Police of a change of address should be at least three days after the move and have a covenant to include a public holidays exception

11. The proposal to notify Tasmania Police of a temporary change of address for a firearm when a Licensee is away from their firearm storage location for 24 hours is unworkable in many cases. This would normally occur during a hunting or target shooting trip. At present it would be difficult to notify over a weekend or public holiday and in an area where there is no communication coverage or police station. In some foreseeable circumstances; by the time a notification occurs the situation for the notification will have passed.

i. We believe that this proposal is unworkable in most cases.

12. The requirement for Australian Citizenship will affect those overseas travellers who come to work in Tasmania on a medium-term basis and those waiting on the processing of their citizenship application. For example,

Service personnel of other nations on exchange to the Australian Defence Force, Australian Federal and state police, medical & scientific staff and emergency service personnel.

13. If stationed in Tasmania for lengthy periods such as one to three years and wishing to continue target shooting and hunting then we believe there should be legislation to enable them to do so.

j. We do not believe a commissioner's exemptions should be used in this case. Our belief is that improved vetting of the applicant as a fit and proper person is the most equitable.

14. The proposal to standardise all detachable magazines to 10 rounds for standardisation reasons is unnecessary and flawed.

For example:

A bolt action rifle such as the model 2A and 2A1 Indian version of the SMLE in calibre .308 has a 12-round magazine version. This magazine is a propriety magazine and sourcing a 10-round replacement would be extremely difficult if not impossible today as these rifles were imported many years ago.

Evidence that firearms utilizing this type of magazine are more deadly than a 10-round magazine or evidence of the use in crime as we do not believe this exists. Introducing this legislation will destroy the firearms useability and value if banned.

k. We believe that the present system of management be retained.

15. At present firearm magazines of higher capacity for Collector held historical firearms are authorised with a commissioner's exemption and there has been a recent difficulty in obtaining this for newly approved collectors.

l. We request that the addition of a clause in legislation to allow collectors to hold high-capacity magazines under the authorisation of their Collectors endorsement for that firearm category.

16. NFR introduction sections of this proposal and its implementation should await a reliable online system that is operational and independently tested prior to new obligations commencing. Creating new legislative requirements in dribs and drabs prior to the NFR commencement – which may be changed, is not optimal. At present parts of this legislation is stated as for future NFR reasons however as the NFR is not operational this proposed legislation cannot operate as intended. However, the legislation if passed and Vice Regal consent given then licencees will be required to adhere to notification requirements without the appropriate NFR portal.

- m. **We believe that when the NFR is ready, tested, operational and licensees educated – at that point legislation should be presented prior to bringing it online.**

17. When extremists gain firearms - despite a system purported to stop them, then we cannot believe in such a proposed tightening of legislative control that will only affect the already over-regulated and compliant licensed firearm owner. The majority of other state jurisdictions are not pursuing these proposals creating an imbalance in legislation around Australian jurisdictions

- n. **Legislation that is not supported across all jurisdictions is sub optimal, creates division, administrative difficulties between jurisdictions and lessens public support**

20. We believe in appropriate sentencing for the criminal misuse of firearms; however, note that sections of these proposals seem unduly harsh, such as for a minor reporting error of, *'not notifying the commissioner of a change of storage location within 24 hours'*, can result in a sentenced for up to two years imprisonment and a \$10,650 dollar fine. We only desire the criminals received such sentencing!

- o. **Unduly harsh maximum sentencing for a minor infractions of an administrative nature**

21. With the large numbers of unregistered firearms – purported to be in excess of one million, the smuggling of firearms and those illegally manufactured that are available to criminals or extremists it is difficult to see how these proposals can 'improve Public safety'. As we have seen with Australian tobacco and US alcohol prohibition, evidence shows illegal trafficking, theft, organised crime involvement and the attractiveness of firearms as a commodity has increased in line with the increasingly stricter level of firearm legislation. The use of firearm legislation does not treat the causes of extremism and crime – it only attempts to band aid the results with the firearm owning community caught between with increasing levels of legislative complexity.

- p. **Target the criminals and extremists not the law abiding and licenced firearm owner**