



Submission on the Firearms Amendment (Miscellaneous) Bill 2026



Prepared by:
Australian Deer Association

5 August 2026

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Submissions at Strategy and Support

Department of Police, Fire and Emergency Management

GPO Box 308

Hobart TAS 7001

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

Re: Firearms Amendment (Miscellaneous) Bill 2026

Dear Sir/Madam,

The Australian Deer Association (ADA) welcomes the opportunity to comment on the Firearms Amendment (Miscellaneous) Bill 2026.

ADA is a national, not-for-profit organisation representing deer hunters and promoting safe and responsible firearm ownership, ethical and humane hunting, wildlife management and compliance with firearms and game laws. Our Tasmanian members have a direct interest in ensuring that firearms regulation protects community safety while remaining evidence-based, proportionate and workable for lawful hunters.

ADA supports the objectives of the National Firearms Register and reforms that improve the ability of police to address firearm theft, trafficking, diversion and criminal misuse. We also support practical modernisation of dealer records and nationally consistent terminology where it improves the operation of the regulatory system.

Our principal concern is the proposed blanket reclassification of straight-pull and button or lever-release centre-fire rifles and shotguns to Category C.

This would not be a simple administrative change. Recreational hunting or vermin control does not ordinarily provide access to a Category C licence in Tasmania. For many existing owners, reclassification would therefore operate as an effective prohibition, requiring the disposal of firearms that were acquired lawfully, registered and used for legitimate hunting purposes.

ADA does not consider that the consultation material establishes why every firearm captured by the proposed definitions presents a risk equivalent to existing Category C firearms. The Bill also places materially different operating mechanisms into the same category and applies an arbitrary one-firearm limit to those who do qualify.

ADA respectfully recommends that the blanket reclassification be withdrawn and replaced with a technically informed process that assesses firearms according to the particular form, feature or function said to create an increased risk.

Summary of recommendations

ADA recommends that the Tasmanian Government:

1. not proceed with the blanket reclassification of all straight-pull and button or lever-release centre-fire rifles and shotguns to Category C;
2. establish a firearm-specific, model-specific or feature-specific classification process supported by published technical evidence and consultation;
3. if reclassification proceeds, create an existing-owner endorsement that permits continued possession and lawful hunting use, remove the one-firearm limit and provide fair transitional and compensation arrangements;
4. implement citizenship requirements with clear recognition of New Zealand citizens who are Australian permanent residents, existing compliant licence holders and people who require firearms to earn a livelihood;
5. clarify the lending, verification, temporary-storage, notification and inspection provisions so that ordinary hunting activities do not create inadvertent offences;
6. establish a regulated licensing, permit or endorsement pathway for suppressors for legitimate hunting, primary production, animal welfare, population-management and occupational purposes; and
7. expressly recognise lawful hunting within the arrangements applying to suitable interstate and international visitors.

1. Principles for reform

Licensed hunters accept substantial responsibilities. These include licence eligibility, genuine-reason requirements, firearm registration, permits to acquire, secure storage, transport controls and restrictions on use.

ADA does not oppose reform merely because it creates obligations for firearm users. We support measures that are:

- directed at a demonstrable public-safety risk;
- proportionate to that risk;
- technically precise and capable of consistent enforcement;
- practical for lawful firearm owners;
- accompanied by fair transition and review arrangements; and
- developed through meaningful consultation with affected communities.
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These principles are particularly important where a proposal would remove previously lawful firearms from existing owners.

2. Reclassification of straight-pull and button or lever-release firearms

2.1 Practical effect on recreational hunters

The Bill would remove affected shotguns from Category A, remove affected centre-fire rifles from Category B and place both action types into Category C. An eligible Category C licence holder would be permitted to possess only one firearm from the combined straight-pull and button or lever-release group.

Under the current Tasmanian Act, a Category C licence is ordinarily limited to applicants whose genuine reason is primary production, animal population control or firearms collection. Recreational hunting or vermin control does not provide ordinary access to Category C, and animal population control is a narrower statutory pathway directed principally to professional or authorised control work. ([Tasmanian Legislation Online](#))

An ordinary recreational hunter therefore cannot simply move an affected firearm from a Category A or B licence to Category C.

The Government's Q&A confirms that an owner who is not eligible for Category C would be subject to a buyback that remains under negotiation.

For many hunters, the practical effect is compulsory disposal. That consequence should be recognised directly in assessing the proportionality of the proposal. A change of this magnitude requires clear evidence that the affected firearms create a materially higher risk, that existing licensing and storage controls are inadequate and that less restrictive measures would not address the identified concern.

The consultation material does not provide that analysis.

2.2 Materially different mechanisms

The Bill defines a straight-pull firearm as a centre-fire firearm manually cycled through a linear movement of the handle, bolt or another component, without the rotation associated with a traditional turn-bolt action.

A button or lever-release firearm is defined differently. It self-ejects the fired cartridge case, uses discharge energy to perform all or part of the operating cycle and requires the manual operation of a button, lever or other mechanism to chamber the next cartridge.

These mechanisms are not the same.

A conventional straight-pull firearm remains fully manually operated: the user must physically cycle the action before another shot can be fired. Linear bolt movement does not, by itself, establish the risk characteristics of a self-loading Category C firearm.

A release-action firearm may use discharge energy to complete part of its cycle, but still requires a separate deliberate manual action before the next cartridge is chambered.

ADA does not submit that every firearm must remain in its current category regardless of technological change. We submit that materially different mechanisms should not be treated as presenting an identical risk without evidence supporting that conclusion.

The consultation materials do not provide comparative technical assessments, model-specific analysis, evidence of criminal misuse or diversion involving these firearm types, or an explanation of why existing Category A and B controls have failed. They identify a public-safety objective but do not show why every firearm captured by the broad definitions requires Category C treatment.

Classification should turn on the characteristic that creates an identifiable risk—not simply whether an action is operated differently from a traditional turn-bolt firearm.

2.3 A more precise classification process

ADA recommends that Tasmania retain the existing classification of affected firearms unless a particular firearm or clearly defined type is demonstrated to have characteristics warranting recategorisation.

A suitable process could:

- identify the particular form, feature or function said to elevate risk;
- distinguish fully manual actions from actions that use discharge energy;
- assess individual models or clearly defined firearm types;
- consider the complete operating cycle and the manual actions required before a subsequent shot;
- obtain advice from appropriately qualified technical experts;
- allow affected users, dealers and representative organisations to provide information;
- publish the evidence and reasons supporting the final classification; and
- allow reconsideration where further technical information becomes available.

A relevant Australian comparison is the more flexible categorisation mechanism being progressed in Victoria, another jurisdiction with an established hunting community. That legislation allows firearms to be assigned across categories by reference to a particular form, feature or function. Its explanatory material describes the approach as more granular and responsive to changes in firearm technology, and it preserves discretion for an existing licence holder to remain licensed following recategorisation.

ADA does not suggest that Tasmania must reproduce another state's legislation. The useful principle is that emerging technology can be addressed through a precise and responsive assessment process rather than automatically placing two broad action types into Category C.

2.4 The one-firearm limit

The proposed single-firearm limit does not account for legitimate differences between firearms sharing the same action type.

Hunters may require different calibres and configurations for different species, terrain, hunting methods and animal-welfare considerations. A firearm appropriate for one quarry species or environment may not be appropriate for another. ADA's engagement and survey data from members consistently reflects these practical requirements across Australia, including in Tasmania.

The limit is also disconnected from individual risk. A fit and proper person who has an accepted Category C reason and compliant storage should not be required to dispose of another firearm solely because both share a broadly defined action type.

ADA recommends removing the restriction and assessing genuine need through the licensing framework.

2.5 Existing-owner protections if reclassification proceeds

ADA's preferred position is withdrawal of the blanket reclassification.

Should the Government proceed, the legislation must include an existing-owner pathway that allows people who lawfully acquired and registered affected firearms to continue possessing and using them.

At a minimum, existing owners should be eligible for an endorsement permitting continued hunting use without the one-firearm limit. Possession should remain lawful while an application or review is determined; affected models should be identified before commencement; owners should receive direct notice and a reasonable compliance period; and refusal decisions should be reviewable.

The Government should retain the ability to refuse, suspend or cancel an endorsement where an individual presents an identified risk. Existing owners should not, however, be excluded solely because recreational hunting is not ordinarily a Category C reason.

2.6 Buyback and compensation

The reclassification provisions should not commence until the buyback and compensation arrangements are settled, funded and publicly available.

The scheme should address eligibility, valuation disputes, dealer stock, dedicated accessories and modifications that lose value. Lawful interstate transfer or modification should remain available.

Compensation should reflect fair market value immediately before the regulatory change. A lawful owner should not bear the financial loss created by compulsory disposal under a new classification.

3. Citizenship and residency

ADA recognises that citizenship requirements are increasingly being adopted across Australian firearms licensing systems. We do not propose to make opposition to the underlying policy a major focus of this submission.

The important issue is ensuring that the Tasmanian provisions include clear and workable recognition of established groups.

The Bill recognises a New Zealand citizen who is an Australian permanent resident only where the person's genuine reason is primary production, animal population control, animal welfare, business or employment, or another prescribed reason. Recreational hunting is not expressly included. Other non-citizens must rely on a discretionary exemption, and a previous exemption does not ensure the same outcome at renewal.

Comparable provisions being progressed in Victoria recognise New Zealand citizens who are Australian permanent residents without restricting that recognition to selected genuine reasons. They also exempt people who reasonably require a firearm to earn a livelihood and allow further classes to be prescribed.

ADA recommends that Tasmania:

- recognise New Zealand citizens who are Australian permanent residents without unnecessarily limiting the genuine reasons available to them;
- protect licences and applications already in force or underway at commencement;
- provide an express livelihood exemption;
- publish the criteria used for discretionary exemptions;
- provide written reasons and review rights; and
- allow continued lawful possession while an exemption or review is unresolved.

This would provide national consistency while allowing Tasmania to implement safeguards appropriate to its community.

4. Other implementation matters

ADA supports the objectives of the National Firearms Register, subject to accurate records, strong access controls, correction of errors, protection of personal and storage information and alternatives when electronic verification is unavailable.

The lending provisions should include a clear safe harbour. A lender should be taken to have complied where the lender sights the borrower's licence, successfully verifies it through the official system and receives a declaration that compliant storage is available and will be used. Telephone or offline verification should be available for remote areas and system outages. A person who reasonably relies on an incorrect official response should not commit an offence.

The obligations are otherwise uncertain, particularly as the Bill requires a lender to "ensure" another person has appropriate storage and intends to comply, with a maximum penalty including imprisonment.

The Government's Q&A states that a hunter away for more than 24 hours does not need to notify police while the firearm remains in the hunter's possession. That clarification should be reflected in legislation or regulations. Temporary storage incidental to lawful hunting, travel, accommodation, repair or an emergency should not be treated as a change to the firearm's usual storage location. A reasonable-excuse provision is also needed for remote areas, weather, road closure, breakdown, injury or illness.

The proposed 24-hour address requirement and seven-day advance notification of changes to licence particulars should be harmonised. The law should allow notification as soon as reasonably practicable where a change is unforeseen.

ADA does not make magazine capacity a central issue, but the legislation should clearly reflect the Q&A's statement that inbuilt magazines are excluded where that is the policy intention. Existing owners should receive a reasonable transition and a lawful modification or disposal pathway.

The new inspection provision should also be clarified to confirm that it does not itself create a power of entry, that reasonable notice will ordinarily be given and that a reasonable excuse is available where a firearm is lawfully held by a borrower, dealer or repairer.

5. A regulated suppressor pathway

ADA recommends that Tasmania establish a regulated licensing, permit or endorsement pathway for suppressors.

The present framework relies on the Commissioner's exemption powers. A defined pathway would provide greater certainty while retaining police oversight. The Tasmanian consultation paper proposes moving suppressors into the licensing framework and recognises legitimate occupational, recreational and hunting use.

Suppressors do not make firearms silent and should not replace appropriate hearing protection. They can, however, reduce noise exposure and form part of a broader hearing-risk-management approach.

A Tasmanian pathway should:

- be limited to a person holding the appropriate firearm licence;
- recognise recreational hunting, primary production, animal population control, animal welfare and occupational use as genuine reasons;
- require acquisition through an authorised dealer;
- record the suppressor against the licence holder;
- impose appropriate storage and transfer conditions;
- permit use only where discharge of the firearm is otherwise lawful; and
- provide written reasons and review rights for refusal or cancellation.

This would maintain controlled access while replacing an uncertain discretionary exemption process with a transparent regulatory pathway.

6. Interstate and international hunting visitors

ADA recommends that lawful hunting be expressly recognised within the arrangements for interstate visitors holding corresponding firearms licences.

Section 55 currently refers to an approved shooting competition or another approved purpose. Express recognition of recreational hunting or vermin control would give visitors and regulators greater certainty, while preserving requirements relating to the appropriate licence, game laws, landholder permission, storage, transport and lawful firearm use.

The Act should also provide a clear temporary pathway for suitable international visitors participating in lawful hunting. This could be achieved by expressly including hunting within the Commissioner's exemption power or by creating a temporary international hunting permit.

Applicants could be required to provide verified identification, evidence of lawful authority to use firearms in their home jurisdiction, details of the Tasmanian hunting activity, landholder or host arrangements, and compliant storage and transport plans. The Commissioner should retain discretion to refuse unsuitable applicants or impose necessary conditions. These reforms would provide regulatory certainty and support lawful regional hunting activity.

7. Conclusion

ADA supports strong, contemporary and effective firearms regulation in Tasmania, including the National Firearms Register and measures directed at theft, trafficking, diversion and deliberate criminal misuse.

Our principal objection is to the blanket reclassification of straight-pull and button or lever-release firearms. The proposal combines materially different mechanisms, is not supported in the consultation material by a published firearm-specific risk assessment and would prevent many recreational hunters from retaining firearms that were lawfully acquired and used.

Tasmania can respond to changing firearm technology through a more precise, evidence-based and consultative assessment process. ADA therefore recommends that the blanket reclassification be withdrawn.

Should it proceed, existing owners must be provided with a practical pathway to retain and lawfully use affected firearms, without an arbitrary one-firearm limit. The provisions should not commence until classification, licensing, review, transition and compensation arrangements are settled and public.

ADA would welcome further engagement with the Tasmanian Government and Tasmania Police to develop reforms that protect community safety while recognising responsible firearm ownership and Tasmania's lawful hunting community.

Yours sincerely,

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