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

The members of the Australian Gun Safety Alliance are appreciative of the opportunity to make this submission on the *Firearms Amendment (Miscellaneous) Bill 2026*.

We support many of the amendments in the Bill and have indicated the issues that could be improved or those we oppose on the basis of public safety.

We are concerned that the gaping hole in the Bill is the complete rejection of public health advice in limiting the number of firearms an individual can own. The Premier agreed at National Cabinet to explore options to limit firearms and we have seen no evidence that options were ever considered by the Minister. The most senior police officer in Tasmania supports limits and has been ignored.

The gun lobby in Tasmania seems to have had the greatest influence over this Bill despite the fact that less than 1% of Tasmanians would be affected by limits.

We hope the advice of the wide range of public sector organisations that makes up the Alliance helps the government reconsider key aspects of the Bill.

Yours sincerely

[redacted]

Australian Gun Safety Alliance

Executive Summary

AGSA has limited resources and therefore writes in full support of the submission provided by the Alannah and Madeline Foundation (AMF). The Foundation is a founding member of AGSA and all members support the key points of their submission.

We have extracted some of those points to reinforce the importance of their consideration by the Tasmanian government before presenting the Bill to Parliament.

Tasmania has a unique place in Australia's firearm safety history with our world leading gun reforms having their roots in the tragedy of Port Arthur. The bipartisan support for the National Firearms Agreement and national gun buyback of semi and automatic firearms was the constructive legacy of such a dark tragedy in Tasmania and Australian history.

Those gun reforms have been recognised by experts as one of our defining public health successes and we have seen dramatic reductions in firearm deaths in Australia since 1996.

The Bondi shooting tragedy December 2025 also brought Australians together in calling for government action to reduce the risk of gun violence. Unfortunately, we have not seen such bipartisanship this time, and in the face of the gun lobby we have seen public safety being made subservient to the interests of firearm owners.

This has never been more obvious than in the process of developing the *Firearms Amendment (Miscellaneous) Bill 2026.* The Bill ignores public sentiment, ignores the core principle that firearms are conditional on public safety, it ignores the views of the Tasmanian Police Commissioner, and it ignores the views of public safety advocates such as various members of AGSA.

All AGSA members hope that the government is sincere in their request for consultation and that the voices of the community and experts from fields such as public health, health promotion, medical practitioners, domestic violence, education, medical specialists and children's charities are heard and that the government remember that its primary responsibility is keeping Tasmanian safe and they ignore the clamouring of the firearm industry.

Our submission does not prevent a single licensed firearm owner from continuing their hobby, their sport or being able to manage their farms. We have always acknowledged that the vast majority of licensed firearm owners are law abiding citizens. However, the social licence that enables the privilege of using deadly weapons for recreation and sport come with significant regulation that puts public safety first.

The Australian Gun Safety Alliance

The Australian Gun Safety Alliance (AGSA) is a broad coalition of voices representing the interests of the community in ensuring that we maintain vigilance on issues of gun safety.

AGSA members are from the public health, medical, hospital, first responder, union, and children's services sectors along with faith organisations and those involved with preventing family violence. All members are shown on the AGSA website.

AGSA is not politically aligned and receives no corporate or individual donations. It is funded by modest philanthropic donations and in-kind services by members.

AGSA understands that the majority of gun owners in Australia are law abiding, responsible people who are not criminals. However, we believe that all governments must do everything in their power to avoid a slide towards an American culture of gun entitlement. They should also uphold their public commitment to the National Firearms Agreement. Finally, governments have a responsibility to all their constituents when it comes to the management of firearms - not just those with a self-interest in the firearm industry.

We are strong advocates for the preamble of the National Firearms Agreement which states clearly that the use and possession of a firearm is a privilege and that the overriding need to ensure public safety should dictate the regulation of firearms.

The convenience or commercial interests of firearm owners, manufacturers, importers and retailers should never take precedent over community safety.

The Bill should include limits on firearms

The Bill ignores significant issues unique to Tasmania. Tasmania has over twice the number of firearms per capita than the national average. It also has a disproportionate rate of firearm theft.

The Bill rightly increases penalties for firearm misuse, but the literature tells us that increases in already lengthy prison sentences have modest deterrent or incapacitation effects at best. Furthermore, the Bill ignores the principle that the use and possession of weapons is subordinate to the need for public safety.

The day after the Bondi shooting, National Cabinet, including the Tasmania Premier agreed to look into options to limit the number of firearms an individual could own. The Tasmanian Firearm Consultation Committee was never presented with options; the Tasmanian government has never presented options to the public and no options are included in this Bill.

The Bill has ignored the advice of the Tasmanian Police Commissioner who has been reported as advising *"In terms of policy and legislative change, I reiterate my support for the national firearms reform agenda, including a proposed firearms cap."*

Tasmanian Police indicate that caps would only affect 9,000 firearm owners. Assuming appropriate exemptions are put in place, it is probable that that less than 1% of the Tasmanian population would be affected by caps on the number of firearms owned.

The gun lobby in Tasmania has been vociferous in their opposition gun reform and therefore we see this Bill which is silent on limiting the number of firearms an individual could own. This means that licensed firearm owners in Tasmania will continue to be able to own 10, 20 or 180 firearms with no further restrictions on their ability to do so.

Tasmania's firearm laws should be guided by the simple public safety principle that possession of firearms is a privilege, not a right, and that privilege must be conditional on protecting the community. This principle sits at the heart of Australia's firearms framework, from the National Firearms Agreement established after Port Arthur to the reforms endorsed by National Cabinet following Bondi.

A reasonable limit on the number of firearms an individual can possess is a practical and proportionate extension of that principle. Such a reform would not prevent legitimate hunting, sport shooting, primary production or occupational use. Instead, it would recognise that as the number of firearms held by an individual increases, so too does the potential risk of theft, diversion, misuse, family violence and suicide. Just as governments reduce foreseeable harm through road safety laws, alcohol controls and workplace safety standards, firearm regulation must focus on prevention, not simply respond after tragedy occurs.

Comments on Firearms Amendment (Miscellaneous) Bill 2026

AGSA supports some of the amendments in the Bill such as:

- National Firearms Register initiatives
- Reclassification of certain firearms
- Improved verification processes
- Stronger provisions relating to domestic and family violence.

AGSA members support all the suggestions and recommendations contained in the submission by the Alannah and Madeline Foundation. For clarity, we include a similar summary table of suggestions and recommendations.

Section		Comments
5.	***Section 3 amended (Interpretation)***	
	handgun shooting club means an approved shooting organisation that conducts or organises handgun shooting competitions;	Insert approved.
	range means approved premises used for sports or target shooting other than with a paintball firearm within the meaning of Part 6A	Insert approved.
	rifle shooting club 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)***	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	Recommend that this be increased to 10 years. Does this give enough scope for Auscheck or equivalent?

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”;	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 *lender* to ensure safe storage.

Australian Gun Safety Alliance Members

- alannah & madeline foundation
- Public Health Association AUSTRALIA
- GCA
- Australian Childcare Alliance
- Australian Childhood Foundation
- AUSTRALIAN EDUCATION UNION AEU
- unicef AUSTRALIA
- The Royal Australian & New Zealand College of Psychiatrists — Your Health in Mind
- Royal Australasian College of Surgeons
- Centre for Excellence in Child and Family Welfare
- COLLEGE OF INTENSIVE CARE MEDICINE OF AUSTRALIA AND NEW ZEALAND
- Domestic Violence Resource Centre Victoria
- No to Violence — Working together to end men's family violence
- RACP Specialists. Together — EDUCATE ADVOCATE INNOVATE
- Australian College of Nursing
- Australian HEALTH PROMOTION Association
- injury matters — PREVENTION TO RECOVERY
- GunPolicy.org — International firearm injury prevention and policy
- Australasian College for Emergency Medicine
- CENTRE FOR ARMED VIOLENCE REDUCTION
- aipn australasian injury prevention network
- ANZICS
- White Ribbon Australia