

Australian Recreation Union



GPO Box 308, Hobart TAS 7001

Attn: Minister for Police, Fire and Emergency Management

Department of Police, Fire and Emergency Management

30 July 2026

Submission to the Tasmanian Government on the Proposed Firearms Law Reforms

Re: Reclassification of Straight-Pull, Lever-Release, Lever-Action and Pump-Action Firearms

The Australian Recreation Union (ARU) is a national body primarily comprising former police officers, defence force personnel, solicitors and healthcare workers.

The ARU welcomes the opportunity to respond to the Tasmanian Government's public consultation on the proposed firearms law reforms, closing 5:00pm Friday 7 August 2026. The ARU supports the overall objective of the reform package — stronger penalties for firearms theft, improved intelligence-sharing, and progress on a National Firearms Register — as sensible, evidence-based measures that target criminal misuse of firearms without unduly burdening law-abiding licence holders.

However, the ARU objects to one element of the package: the proposed reclassification of straight-pull and button/lever-release (self-ejecting) centre-fire and shotgun firearms to the more restrictive Category C licence, and is concerned this approach may also be extended to, or already inconsistently affects, conventional lever-action and pump-action firearms. The ARU asks the Government to reconsider this aspect of the reform, for the reasons set out below, and to adopt one of the two alternative approaches proposed.

1. The scale of Tasmania's feral animal problem

Before addressing the specific proposals, the ARU submits that the Government should have regard to the scale of the feral animal burden already facing Tasmanian primary producers, land managers and communities — a burden that licensed hunters and pest controllers materially help to manage, and which any restriction on firearm access or numbers will directly worsen.

- Feral deer: the Tasmanian Government's own 2024 aerial survey found the fallow deer population had grown from approximately 53,660 in 2019 to 71,655 in 2024 — a rise of roughly 33.6% in five years, with some more recent estimates placing the population above 100,000 and still growing. Independent economic modelling commissioned in 2026 found feral deer are costing the Midlands and eastern regions alone more than \$53 million per year, with industry (TasFarmers) separately estimating a direct farmgate impact of \$41 million annually and other assessments citing losses as high as \$87–100 million per year once forestry, infrastructure and road-safety impacts are included.

- Feral rabbits: rabbits are estimated to cost Tasmanian and Victorian beef, lamb and wool producers a combined \$30 million per year in lost production, within a national agricultural cost of close to \$200 million annually. Tasmanian farmers and local media reported a renewed surge in rabbit numbers across parts of the state, including the Meander Valley, in the past year, underscoring that this is a live and worsening problem, not a historical one.
- Wallabies, possums and other browsing species: Tasmanian Government guidance for primary producers confirms that Bennett's wallabies, pademelons, possums and other browsing wildlife routinely cause pasture and crop losses equivalent to the grazing pressure of significant numbers of livestock on affected boundaries, with individual farms reporting losses equivalent to over 100 breeding cattle where control is not maintained.

These figures demonstrate that firearm-enabled pest control is not a recreational nicety but an active response to a measurable and escalating economic and environmental problem. A Tasmanian Government-commissioned study into the economic contribution of recreational hunting and shooting found that hunting activity already contributes some \$29 million per year to the Tasmanian economy in its own right, in addition to its pest-suppression value — activity that depends on hunters retaining lawful access to an adequate range of firearms suited to the species and terrain involved. Restricting the types or number of firearms available to this cohort, without evidence that doing so improves public safety, risks compounding an already costly and worsening feral animal burden on Tasmanian agriculture and the environment.

2. These action types warrant continued Category B treatment

Lever-action, pump-action and straight-pull firearms are manually operated repeating actions: each shot requires a distinct, deliberate manual cycling motion by the operator. This is functionally and materially different from self-loading (semi-automatic) actions, which the National Firearms Agreement and Category C/D framework were originally designed to address. Treating manually cycled actions the same as self-loading actions blurs a distinction that has underpinned Australian firearms categorisation since 1996.

- Rate of fire: manually cycled actions cannot match the practical rate of fire of self-loading firearms, which is the core public-safety rationale for tighter restriction.
- History and prevalence: these actions have been lawfully owned and used in Tasmania for decades, including under Category B, without evidence of disproportionate involvement in criminal misuse.
- Consistency: lever-action shotguns with a magazine capacity of five rounds or fewer already sit in Category B; a further reclassification specifically because of the lever, pump or straight-pull mechanism — rather than magazine capacity or rate of fire — is not clearly justified on public safety grounds.

For these reasons, the ARU's primary submission is that straight-pull, lever-release, lever-action and pump-action firearms (within existing magazine capacity limits) should remain under Category B, consistent with their current treatment and their manually operated nature.

3. The case for reclassification is unsubstantiated

The ARU has reviewed the evidence base advanced for reclassifying action-type firearms in this and comparable reviews and submits that it does not withstand scrutiny. The peer-reviewed literature on Australian firearms restrictions consistently finds no measurable public safety benefit attributable to action-type or semi-automatic restrictions specifically, as distinct from other contemporaneous reforms:

1. McPhedran, S., & Baker, J. (Injury Prevention; Journal of Law and Medicine) — the National Firearms Agreement semi-automatic bans and buyback had little to no significant effect on firearm or total homicide rates. No acceleration in declines beyond pre-1996 trends was identified, and the post-1996 absence of mass shootings has been attributed to their rarity rather than to the bans.

2. Lee, W.-S., & Suardi, S., "The Australian Firearms Buyback and Its Effect on Gun Suicides and Homicides" — found no large or statistically significant effect of the semi-automatic bans and buyback on firearm homicide rates, with total homicides unchanged after 1996 and declines predating the reforms.

3. Australian Institute of Criminology, "Mass Shootings and Firearm Control — Comparing Australia and the United States" — found no net public safety effect beyond suicide rates, and concluded the drop in mass shootings cannot be solely attributed to action-type restrictions.

4. Harvard School of Public Health Bulletin, "Australian Gun Buyback" — post-NFA evaluations found no beneficial effect of the semi-automatic restrictions on firearm homicide rates, with declines not attributable to the bans.

Taken together, this body of research indicates that a firearm's cycling mechanism has no demonstrated, independent bearing on public safety outcomes. A reclassification premised on action type alone — rather than on magazine capacity, calibre or documented misuse — is not supported by the evidence and risks penalising law-abiding licence holders without a corresponding safety gain.

Cycling speed does not support the proposed distinction

Analysis of rapid-fire events involving firearms shows that attackers typically lower the rifle, cycle the action, raise it, and aim, with intervals of roughly 4–5 seconds between shots — a pattern governed by deliberate aimed fire and sight-picture reacquisition (which itself adds around two seconds), not by the mechanism used to cycle the action. Comparative testing of action types found cycling speeds of approximately 1–3 seconds for bolt actions, and 1–2 seconds for pump-action, straight-pull and button-release actions. This narrow, roughly one-second difference is immaterial to criminal misuse, where aimed-fire intervals dominate, but is operationally significant in the field: in dense, steep or undulating terrain it allows a critical follow-up shot to ensure the immediate, humane dispatch of a wounded animal.

4. Alternative: if reclassified to Category C, expand the Category C occupational definition to include volunteer pest controllers

If the Government proceeds with reclassifying these action types to Category C, the ARU submits that the current Category C occupational-purpose eligibility criteria are too narrow and should be expanded. At present, Category C access is generally limited to primary producers and recognised occupational

shooters. This excludes a significant group who rely on these firearms for legitimate, community-benefiting pest and feral animal control: volunteer pest controllers operating under coordinated programs.

- Volunteers participating in government-endorsed or Landcare-coordinated feral animal control programs (feral cats, wild deer, wild dogs, rabbits and other declared pests) provide a genuine public and environmental benefit, often on public land or under formal agreements with Parks and Wildlife Service, NRM bodies, or local councils.
- Many of these volunteers do not meet the strict definition of 'primary producer' because pest control is not their commercial occupation, yet their need for an effective, reliable manually operated repeating action is the same as that of a primary producer.
- Excluding volunteer pest controllers from Category C eligibility risks reducing the volunteer pest-control workforce at a time when feral animal impacts on agriculture, biodiversity and native species remain a significant and growing problem in Tasmania — consistent with modelling elsewhere showing pest populations can surge 20–50% where control effort lapses.

The ARU therefore proposes that the definition of eligible occupational categories for Category C licensing be expanded to explicitly include: persons formally accredited or endorsed under a recognised Tasmanian Government, council, or Landcare-affiliated volunteer pest or feral animal control program, subject to appropriate program endorsement, training and reporting requirements to maintain accountability.

5. Transitional fairness

Should any reclassification proceed, the ARU asks that the Government confirm that the announced buyback and compensation arrangements (compensation at 1.5 times market value for reclassified firearms, and voluntary buyback at market value for other firearms) apply equally and without delay to owners of lever-action, pump-action and straight-pull firearms affected by any reclassification, and that a clear, low-cost transitional licensing pathway is provided so that affected primary producers and pest controllers are not left without a lawful means of pest control while new licences are processed.

6. Opposition to the proposed cap on the number of firearms a person may possess

The ARU understands that the Tasmanian Government (Labor) is separately proposing to impose a cap on the total number of firearms an individual may lawfully possess. The ARU objects to this proposal in the strongest terms. As with the action-type reclassification addressed above, there is no evidence that the number of firearms lawfully owned by a licensed individual has any bearing on public safety, and the proposal fails to account for the practical reality that responsible participation in hunting, pest control and competitive shooting routinely requires access to multiple, purpose-specific firearms.

6.1 There is no evidence base for a numerical possession cap

No credible study has established a link between the quantity of firearms held by a vetted, licensed owner and any increase in risk of criminal misuse, homicide, or other violent offending. The relevant risk factors recognised in the literature relate to who may lawfully possess a firearm and how it is stored and used — not how many firearms a compliant, background-checked individual owns. A cap targets an

arbitrary metric that has no established causal relationship to harm, while imposing a real and disproportionate burden on law-abiding hunters, pest controllers and competitive shooters who legitimately require multiple firearms of different types.

6.2 The New South Wales precedent: caps and comparable reforms were adopted without evidence

The ARU draws the Government's attention to the recent experience in New South Wales, where significant firearms amendments were introduced and passed on 24 December 2025 via the Terrorism and Other Legislation Amendment Act 2025. Prior to those amendments, the NSW Police Force conducted its own internal review of the Firearms Act 1996 and associated regulations to assess whether they remained fit for purpose. That review recommended no substantial changes, including no additional restrictions on the types of firearms available to Category A and B licence holders and no reduction in standard licence terms.

The ARU's former National Director met directly with [Redacted] who confirmed that NSW Police did not wish to propose changes to the Firearms Act or regulations without clear evidence supporting such changes, and stated explicitly that no evidence existed to justify the reforms ultimately introduced. Separately, the Honourable John Ruddick MLC and the Honourable Roy Butler MP met with the NSW Police Minister, who likewise confirmed that only minor or no changes were contemplated by police — certainly not the broad suite of restrictive measures ultimately enacted, including new limits on firearm holdings.

Despite these assurances from senior police, the NSW Government proceeded regardless. The ARU has formally referred allegations of corruption, serious maladministration and misleading of Parliament by the NSW Premier and Police Minister to the Independent Commission Against Corruption (ICAC), concerning false and misleading assertions made in Parliament and to the media to unduly influence public and parliamentary opinion in support of legislation that senior police, elected representatives and consultative bodies confirmed was not supported by evidence. The ARU submits that Tasmania should not repeat this pattern, and that any possession cap should be withdrawn absent a genuine, published evidence base specific to Tasmania.

6.3 Academic and empirical research supports no correlation between firearm numbers and public safety

A substantial body of Australian and international research has examined the relationship between firearm ownership levels and violent crime or homicide, consistently finding no supporting evidence for restrictions premised on ownership quantity:

1. Kleck, G., "The Impact of Gun Ownership Rates on Crime Rates: A Methodological Review of the Evidence" (Journal of Criminal Justice) — of the 41 strongest studies reviewed, only two supported a link between higher gun ownership and higher crime or homicide rates; ten found higher ownership correlated with less crime; and 29 found no relationship at all.
2. Lott, J.R., "More Guns, Less Crime: Understanding Crime and Gun Control Laws" (University of Chicago Press) — found no evidence that higher ownership increases homicide rates, with the data instead suggesting ownership can deter crime; on this basis, limits on ownership quantity would not be expected to improve safety and could increase vulnerability.

3. Leigh, A., & Neill, C., "Do Gun Buybacks Save Lives?" (American Law and Economics Review) — found that Australia's 1997 national buyback, which reduced civilian firearm ownership by roughly 20%, had no significant effect on firearm homicides, total homicides, overall gun deaths, or violent crime rates across the states.

4. Baker, J., & McPhedran, S., "Firearm Homicide in Australia: A Study of Trends and Comparisons" — found the National Firearms Agreement had no discernible influence on firearm or total homicide patterns, and that comparable jurisdictions without strict ownership caps, such as New Zealand, showed similar homicide trends.

5. Taylor, L.J., "Do Fewer Guns Lead to Less Crime? Evidence from Australia" — found the NFA and buyback reduced armed robbery but had no significant effect on total homicides or overall violent crime rates, with public safety benefits negligible beyond specific armed offences.

6. Kleck (2015) meta-analysis in the Australian context — reviewing 41 studies, found no net effect of gun ownership levels on total homicide rates; firearm prevalence was found to influence the method of violence, not its incidence.

7. Australian Institute of Criminology reporting (including 2020) — confirms Australia's total homicide rate has remained stable at approximately 1.0–1.2 per 100,000 since the NFA, with no spike in non-firearm homicides and no accelerated decline attributable to ownership restrictions, tracking global trends rather than domestic reform.

This research base is directly relevant to a possession cap: if the far more significant 1996–1997 reduction in national civilian ownership produced no measurable homicide or violent-crime benefit, a cap restricting the number of firearms held by already-vetted individual licence holders cannot plausibly be expected to do so either.

6.4 Multiple firearms and calibres are required to match the species being hunted or controlled

A single firearm cannot safely or humanely address the full range of game and pest species encountered by Tasmanian hunters and pest controllers. Wildlife and land-management authorities set minimum calibres for humane dispatch that vary materially by species, body mass and typical engagement range, and experienced hunters and industry guidance frequently recommend calibres above the regulatory minimum to ensure an ethical, immediate kill:

- Calibre-to-game-size matching: using an underpowered round on a large-bodied animal risks a shallow wound, internal bleeding and prolonged suffering, while an unnecessarily powerful round is inappropriate and wasteful for small pest species such as rabbits.
- Terrain and range variability: Tasmanian hunters and pest controllers encounter conditions from dense forest to open farmland, requiring different calibres, barrel lengths and action types to maintain sufficient ballistic energy for an immediate, humane kill at the relevant distance.
- High-volume pest control: feral animals such as pigs and deer are frequently encountered in groups, where a manually cycled repeating action allowing rapid, aimed follow-up shots reduces the risk of a wounded animal escaping to suffer or reoffend against crops and stock.
- Fixed-tube and rimfire actions: low-recoil, precision rimfire rifles with fixed tubular magazines are essential for humane headshot dispatch of small pests such as rabbits and foxes, and are

functionally unsuited to any other role, meaning they represent an additional, non-substitutable firearm for a genuine pest controller.

A licence holder engaged in both recreational hunting and pest control on Tasmanian properties can therefore reasonably require several firearms of different calibres and actions simply to meet the minimum standard of a humane, ethical dispatch across the species and terrain they encounter — before any competitive shooting activity is considered at all.

6.5 Firearms required across competitive shooting disciplines

Competitive shooting sports are structured around distinct disciplines, each of which involves its own rules, target distances and equipment specifications that generally cannot be met by a single firearm. The table below sets out, by discipline, the firearms the ARU submits are reasonably required for a participant to compete across the standard range of events within that discipline.

Discipline / activity	Firearms required	Reason / event variation
Pest control (rabbits, foxes, pigs, deer)	5	Different calibres and actions suited to species size and terrain, ensuring humane dispatch across pest types.
Target pistol shooting	5	ISSF, action pistol and metallic silhouette each require different calibres, sight systems and grip configurations.
Target rifle shooting	5	Benchrest, F-Class and service rifle disciplines require different barrel lengths, stock designs and optics for competitive performance.
Clay target / shotgun competitions	5	Trap, skeet, sporting clays and double trap each call for different chokes, barrel lengths and actions optimised for the event.
Western action shooting	6	At least two firearms per category (single-action revolvers, lever-action rifles, pump-action shotguns) to provide main and backup firearms in timed events.
Total across 5 disciplines	26	Minimum firearms required for a licence holder participating in the full range of recognised competitive and pest-management disciplines.

This is illustrative, not exhaustive: many licence holders participate in more than one discipline, and the totals above compound accordingly. A flat cap of five or ten firearms, applied irrespective of the disciplines a person is actively engaged in, cannot accommodate even a single multi-event competitor and is unworkable in practice for the great majority of active hunters, pest controllers and competitive shooters.

6.6 ARU position

- No cap should be imposed on the total number of firearms an individual may lawfully possess, in the absence of any evidence — in Tasmania, NSW, or the wider Australian and international literature — that ownership quantity affects public safety outcomes.
- If a baseline allowance is nonetheless legislated, it should be set at a minimum of five firearms per shooting discipline or pest-management purpose in which the licence holder is actively engaged, verified through licensing records, club membership or landholder agreements, rather than a single flat number applied across all purposes.

- Any firearms held beyond a baseline allowance should be able to be acquired via a straightforward permit-to-acquire process demonstrating genuine need, rather than a hard prohibition.
- Existing licence holders should be subject to a grandfather clause preserving lawfully held firearms in excess of any new cap.

7. Integrity in law-making

The ARU submits that the concerns raised in this submission point to a broader principle that should guide this and every reform process: parliamentarians are entrusted by the community with the power to make laws affecting the rights, property and livelihoods of citizens, and with that trust comes a corresponding responsibility to legislate only where a genuine, evidence-based case for reform has been established through rigorous inquiry and open consultation.

Laws introduced without such an evidentiary basis are not merely poor policy — they risk being unjust in their effect on the individuals and communities they target, and they erode public confidence in the law-making process itself. As set out above, neither the proposed reclassification of manually operated actions nor the proposed cap on firearm numbers is supported by the available evidence, in Tasmania or in comparable jurisdictions. The ARU submits that parliamentarians hold a moral and democratic obligation to represent all of their constituents fairly and to act in the best interests of the whole community — including licensed firearms owners — when exercising their law-making functions, and that this obligation is best discharged by grounding reform in substantiated evidence and genuine inquiry rather than in assumption or precedent from other jurisdictions.

8. Evidence base, economic impact and consultation process

8.1 The Government should publish the evidence base and Regulatory Impact Statement before proceeding

Consistent with the principle set out above, the ARU formally requests that the Government publish, prior to finalising any reclassification or possession cap, a Regulatory Impact Statement or equivalent evidence base setting out: the specific data relied upon to justify each proposed change; the anticipated public safety benefit expected to result; and an assessment of the impact on law-abiding licence holders, primary producers and the pest-control and competitive shooting sectors. Where no such evidence base exists, the ARU submits the proposal should not proceed. Publishing this material would allow stakeholders to engage with the actual case for reform, rather than respond to the proposals in the abstract, and would materially strengthen the legitimacy of any changes that are ultimately made.

8.2 Economic impact on firearms businesses and regional communities

The ARU asks the Government to assess and publish the likely economic impact of the reclassification and possession cap on Tasmanian firearms dealers, ranges, clubs and associated regional businesses, many of which operate on thin margins in rural communities. Reclassification and caps affect not only the value and usability of existing stock but also forward orders, servicing and range membership, with flow-on effects for regional employment. The cost of the compensation and buyback scheme itself should also be transparently costed and published, consistent with the Government's own stated

compensation commitments, so that Tasmanian taxpayers can assess whether the scheme represents value for money relative to any demonstrated safety benefit.

8.3 The consultation timeframe should reflect the complexity of the proposals

The reform package addresses multiple substantive and technical matters — action-type classification, magazine capacity, possession caps, citizenship requirements and intelligence-sharing arrangements — each of which would benefit from focused, evidence-based consultation in its own right. The ARU submits that a single consultation window closing 5:00pm Friday 7 August 2026 may not provide adequate time for affected stakeholders, particularly regional and volunteer-based organisations, to engage meaningfully with the full scope of the package. The ARU requests that the Government consider extending the consultation period, or providing a further defined opportunity for stakeholder response once any Regulatory Impact Statement or evidence base is published, to ensure the final reforms are properly tested against stakeholder input rather than finalised on a truncated timeframe.

9. Hunting tourism

Tasmania's hunting and pest-control sector has a demonstrated interstate and international visitor market, and the ARU submits the reform package should not inadvertently close this off. Consistent with the approach recommended in comparable reviews, the ARU proposes that the Firearms Act (or associated regulations) expressly provide for a single-occasion, supervised hunting permission for interstate and international visitors, conducted under the direct supervision of a Tasmanian-licensed host and subject to standard safety and storage conditions. This would support regional tourism and hospitality operators — particularly in areas most affected by feral deer — without extending standing licences to non-residents, and would align Tasmania with sensible visitor provisions already recommended elsewhere in the national reform conversation.

Summary of requests

- Retain straight-pull, lever-release, lever-action and pump-action firearms (within current magazine limits) under Category B, as the proposed reclassification is not supported by the evidence on action-type cycling speed or comparative public safety outcomes; or
- If reclassified to Category C, expand the Category C occupational eligibility definition to explicitly include accredited volunteer pest controllers operating under recognised government, council or Landcare-affiliated programs; and
- Ensure fair, timely compensation and a clear transitional licensing pathway for anyone affected by reclassification;
- Withdraw the proposed cap on the total number of firearms an individual may possess, as it is unsupported by evidence and unworkable for hunters, pest controllers and competitive shooters who require multiple purpose-specific firearms; or, at minimum, adopt a discipline-based allowance rather than a flat numerical cap;
- Publish the Regulatory Impact Statement or evidence base for each proposal, and the projected cost of the compensation and buyback scheme, before any changes are finalised;

- Extend or supplement the consultation period to allow proper stakeholder engagement with the full reform package; and
- Provide for single-occasion, supervised hunting permissions for interstate and international visitors to support regional hunting tourism.

The ARU respectfully urges the Review to adopt an evidence-led, proportionate approach that distinguishes manually operated actions from self-loading firearms, and that recognises the positive contributions of licensed firearms owners to pest management, animal welfare and recreational pursuits in Tasmania.

Thank you for the opportunity to contribute to this consultation. The ARU would welcome the opportunity to discuss this submission further and remains available to provide additional detail or oral evidence as required.

Yours sincerely,

Australian Recreation Union