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Submissions at Strategy and Support,
Department of Police, Fire and Emergency Management
By email only - submissions.strategy.support@DPFEM.tas.gov.au

Dear Friends

Firearms Amendment (Miscellaneous) Bill 2026

I am the chair of Biathlon Australia – the National Sporting Organisation for the Olympic and Paralympic Sport of Biathlon.

Biathlon Australia welcomes the opportunity to provide this submission on the Firearms Amendment (Miscellaneous) Bill 2026.

Biathlon rifles have a straight pull repeating action and shoot a sub-sonic bullet from a .22inch **rimfire** cartridge (aka a .22LR) (**Biathlon Rifle**). Currently in Tasmania (and all other states/territories), Biathlon Rifles are classified as a Category A firearm or require a Category A license.

We are extremely pleased that the Bill does not propose recategorising **rimfire** rifles with a straight pull action.

Thank you.

Proud member of:



Firearm Law Amendments

As you know, post the Bondi Terrorist Attack in December 2025 several Australian jurisdictions (including Tasmania) have undertaken reviews of their respective firearm laws.

Regrettably, the Commonwealth and NSW rapidly passed amendments to the *Customs (Prohibited Imports) Regulations 1956* (Cth) and *Firearms Act 1996* (NSW) respectively, which (among other things) reclassified **rimfire** rifles with a straight pull action from Category A to Category C. The NSW amendment has yet to be proclaimed.

Since then, Biathlon Australia has been working with the Federal Department of Home Affairs and NSW Police | Firearms Registry on permanent workarounds to ensure the sport of biathlon can continue to thrive in Australia. Both jurisdictions have been great to work with.

Commonwealth

On 7 July 2026, The Hon. Tony Burke, Minister for Home Affairs, made the [Customs \(Prohibited Imports\) \(Sports Shooters—Biathlon\) Instrument 2026](#). Paving the way for Australian gun dealers to continue importing and selling straight pull action biathlon rifles to our amazing Aussie biathletes.

This finally tuned instrument also enables us to invite international biathletes to compete at events in Australia (with their own rifle), such as the inaugural IBU Regional Event | Oceania Cup – to be conducted at the Australian Biathlon Arena | Mt Hotham, on 7-9 August 2026.

NSW

We continue to work with our friends at NSW Police | Firearms Registry to come up with a permanent and workable administrative solution to the earmarked recategorisation of straight-pull rimfire rifles to Category C – which has yet to come into effect. We are hoping to have something concrete to announce in the coming months – and well before the recategorisation comes into effect.

We are extremely grateful for the ongoing engagement with NSW – they've been truly

great to work with.

ACT

Meanwhile, the Legislative Assembly for the Australian Capital Territory Standing Committee on Legal Affairs has released their [Inquiry into legislation on proposed firearms reform](#). The Committee heard submissions from myself, along with the NRAA and others in shaping their recommendations. The noble sport of biathlon is 100% on their radar (being mentioned 40 times in the report).

Notably we draw your attention to paragraphs 2.79-2.107, and *“Recommendation 5: The Committee recommends that the ACT Government undertake further work to enable biathletes to participate in their sport in the ACT and develop a consistent process for further cases as they arise.”*

We thank the ACT Standing Committee on Legal Affairs for taking the time to hear our submissions and highlight the Olympic & Paralympic Sport of biathlon.

Victoria

The Victorian Government has introduced the [Firearms Amendment Bill 2026 \(Vic\)](#). Importantly, unlike the ACT, NSW and the Feds, the Bill does not explicitly propose to recategorise rimfire rifles with a straight-pull action. So, like Tasmania, for now biathlon rifles will remain in Category A.

Importantly, the Victorian Bill is in response to the [Rapid Review of Victoria's Firearms Laws – Final Report](#) which found (at para 6.3.3) that *“Reclassifying firearms requires further consideration of who uses them and for what purpose, and whether those uses are recognised as a genuine reason. These considerations will be considered at the national level. For example, **concerns were raised that reclassifying straight-pull firearms to Category C could unintentionally affect biathlon athletes**, as Category C currently recognises clay target shooting as a genuine reason, but not sport or target shooting more broadly.”*

Tasmania

It was a pleasure to read the Firearms Amendment (Miscellaneous) Bill 2026 (Tas) and see that Tasmania – together with all other states (other than NSW) do not propose to

recategorise **rimfire** rifles with a straight pull action.

This is extremely logical as:

- Biathlon Rifles (.22LR rimfires) are extremely specialised, expensive and relatively 'low-powered'; and
- are used for the genuine reason of sport target shooting.

Background

Biathlon Australia is recognised by the [Australian Sports Commission](#) as the National Sporting Organisation for the Winter Olympic and Paralympic sport of Biathlon.

Biathlon Australia is a full member of

- the [International Biathlon Union \(IBU\)](#) – which is headquartered in Salzburg, Austria;
- the [Australian Olympic Commission \(AOC\)](#); and
- [Paralympics Australia \(PA\)](#).

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Australian Biathlon Arena | Whiskey Flat, Hotham, Victoria

The Australian Biathlon Arena at Whiskey Flat, Hotham, Victoria is Australia's only competitive biathlon arena – with a full cross-country loop and a 15-lane shooting range. It plays host to:

- The National Biathlon Championships each July,
- The Australian Biathlon Championships each August,
- The Australian Defence Force (ADF) Interservice Biathlon Championships, and
- Numerous development and national team camps – from 'future stars' through to youth & juniors, and senior/open to masters.

Whiskey Flat is Biathlon Australia's home and serves as the perfect training ground for those wishing to represent Australia in the green & gold.

This year we will host the inaugural Oceania Cup – an IBU sanctioned & supported 'regional event'. The first of its kind in the Southern Hemisphere.



Moreover, Biathlon Australia has secured funding under the Victorian Government's Significant Sporting Events Program in connection with our 2025, 2026, and 2027 Championship events. This is in addition to numerous other grants from Victoria, NSW, the Commonwealth, the Australian Olympic Committee, Paralympics Australia and the International Biathlon Union.

Suffice to say, the sport of biathlon is thriving in Australia.

What is Biathlon?

Biathlon is a combination of cross-country skiing (roller skiing in summer) and precision target shooting. Able bodied biathletes use highly specialised, very expensive small-bore rifles with a straight pull action. Athletes ski over a set distance, stopping at shooting ranges to fire at targets from both standing and prone positions.

The sport is governed in Australia by Biathlon Australia and internationally by the International Biathlon Union (**IBU**) and features in the Winter Olympics and Paralympics, as well as in a range of international and regional competitions. Summer biathlon is also very popular where skis are replaced with roller skis.

Equipment

- Able bodied biathletes use a .22 calibre (5.6mm) rimfire rifle, typically with a straight-pull repeating action. The rifles are lightweight for easy carrying during skiing and must comply with strict competition regulations regarding magazine capacity and ammunition.
- Ammunition is sub-sonic .22LR rimfire cartridges.
- Targets are set at 50 metres. The target size is 45mm in diameter for prone shooting and 115mm for standing shooting – in other words the targets are tiny.
- Para-biathletes use either air-rifles or laser rifles (depending on their disability).
- Children, and those new to biathlon, use laser rifles to get themselves started.

Governing Body and Major Events

- The IBU oversees all international competitions, including the Olympic and Paralympic biathlon events.
- Major competitions include:
 - Winter Olympic Games
 - Winter Paralympic Games
 - Youth Winter Olympic Games
 - IBU World Championships (able bodied and para)
 - IBU World Cup (able bodied and para)
 - Open European Championships
 - Youth and Junior World Championships
 - IBU Cup
 - IBU Junior Cup

- Regional events (e.g., Alpen Cup, Balkan Cup, Baltic Cup, and Australia's very own Oceania Cup)
- Masters' events (for older athletes), including the World Masters Games and International Masters Biathlon Championships
- The University Games

Biathlon Australia biathletes compete in all the above competitions – from Youth (15-18) to Junior (19-20), and senior to masters. The IBU season launches in Munich, Germany in October and runs through to March. Races are held throughout Europe, Scandinavia, Asia and North America.

Each year, Biathlon Australia host the National Biathlon Championships in July and the Australian Biathlon Championships in August – now replaced by the Oceania Cup.

Types of Races and Competitions

- Sprint
- Individual
- Pursuit
- Mass Start
- Relay
- Mixed Relay

Skiing and Shooting

- The skiing component is freestyle (skate skiing), covering distances from 6km (female sprint) up to 20km (male individual).
- Athletes alternate between skiing and shooting, with penalties (extra distance or time) for missed shots.
- Shooting is performed at 50 metres, alternating between prone and standing positions, with five shots per bout.
- The format for Para Biathlon is similar, though race distances, rifles, equipment and shooting distances vary

Biathlon is a race. It's all about speed. Hence, having a rifle with a straight-pull action saves precious minutes over the course of a race. This is the difference between finishing on a podium or in the second half of the field.

Biathlon Rifles



Biathlon rifles have a straight pull repeating action and shoot a sub-sonic bullet from a .22inch **rimfire** cartridge (aka a .22LR) (**Biathlon Rifle**). These rifles are specifically designed to hit metal targets at a range of 50 metres. They are also probably adequate to kill rabbits and other small critters. They are **not** high powered, high calibre nor high velocity. They are highly specialised, extremely expensive (circa AU\$10,000 +/-) and have very specific specifications as set out in the IBU's competition rules & guidelines.

[Anschütz](#) is the dominant brand and said to be used by 97% of biathletes worldwide.

All Australian and international biathletes use straight pull biathlon rifles, predominantly produced by Anschütz. This is **the** international standard.

Straight pull rifles remain **manually** operated bolt-action firearms, differing only in the direction of bolt travel rather than in rate of fire or lethality. There is negligible **real-world** difference in cycling speed or operational capability compared to conventional bolt-action rifles. Though, for a high-performance biathlete competing on the international stage every second counts. And with up to 40 targets to hit in a single race it would not be worth entering if Australian biathletes had to use a non-straight pull rimfire rifle. Moreover, Biathlon Rifles shoot a relatively small .22 calibre rimfire bullet that travel at subsonic speeds – so the potential ‘danger’ is somewhat reduced when compared to more high-powered centre fire rifles.

To the best of my knowledge, all Australian biathletes have peacefully and compliantly used and possessed their Biathlon Rifles under their category A licences. Amending Tasmanian firearm laws with respect to Biathlon Rifles (straight pull rimfire rifles, .22LR) is simply not warranted.

Numerical Limits on the number of firearms

Some jurisdictions have / propose / considered numerical limits on the number of firearms an individual might own. In theory this sounds reasonable – if a person only had one reason to own a firearm eg if they only ever hunt deer, or only take part in one sport. If so, then having 2 or 3 rifles for that purposes will possibly suffice.

But, some people will have multiple reasons for using a firearm, eg, they might hunt various types of game, they might be primary producers or pest controllers, they might take part in numerous target shooting sports. Moreover, parents of minors might acquire firearms for their children, and themselves, to hunt or compete with.

In those circumstances, a person could require several firearms.

Further, it should be noted that some biathletes / their parents own multiple Biathlon Rifles – eg a training rifle, a competition rifle, a ‘spare parts’ rifle. Moreover, as you might imagine, biathletes – like most sports people – want the ‘latest and greatest’ and from time to time will upgrade their Biathlon Rifle to a newer model. In so doing, many will keep their old rifle/s as a spare. Just like many competitive cyclists, golfers, tennis players, etc have multiple bikes, sets of clubs & racquets.

Moreover, some biathletes – in addition to owning one or more Biathlon Rifles might also have other rifles for use in other sport target shooting events (such as clay target shooting) or hunting purposes or primary production purposes or pest control purposes.

Further, often it is the parents of youth (U18) athletes that acquire biathlon rifles for their kids. Likewise, this might be in addition to other rifles for other purposes. Also, some parents also compete in biathlon at Master’s events. So, they might own both their own Biathlon Rifle/s and those of their kids.

Accordingly, if considering numerical limits on the number of rifles that a person might own we respectfully request that you consider that athletes / their parents might require multiple rifles for various reasons. A rigid numerical cap risks failing to

reflect the diversity of legitimate firearm use in Tasmania.

Minor (U18) Biathletes

The draft ACT Firearms Amendment Bill proposes to outlaw any minor (U18) from possessing or using a Biathlon Rifle. This must be avoided in Tasmania at all cost please.

For context – biathletes (like most sports) follow a tried and tested progression:

Grassroots (kids) → Youth (teens) → Juniors (young adults) → Seniors (adults) → Masters.

Australian Youth and Junior biathletes train and compete both locally (at our National & Australian Championships) and internationally in IBU sanctioned camps, Regional Events, IBU Junior Cups, IBU Junior Open European Championships, IBU Youth & Junior World Championships and the Youth Winter Olympic Games.

In fact, Biathlon Australia fielded a team of 3 boys and 3 girls at the most recent Youth Winter Olympic Games in Pyeongchang, Korea.

These are all critical stepping stones towards gaining confidence and qualification to compete on the IBU Cup, the IBU World Cup, at the IBU World Championships and eventually the Olympics.

Again, as noted above, all Australian and international biathletes, including under 18-year-olds, use straight pull rifles, predominantly produced by Anschütz. This is the international standard.

To the best of my knowledge, all Australian minor biathletes have peacefully and compliantly held category A licences..

Extra-Territorial Impacts

We are concerned with the potential extra-territorial effect of any potential changes to state-based firearm laws – including Tasmania's.

For instance, depending on how the law might be amended it is conceivable that lawfully licensed biathletes from one state/territory or countries might not be permitted to possess or use a Biathlon Rifle in another state/territory. If so, this will impact the ability of biathletes in some states/territories to travel to / from other states/territories to train or compete.

Likewise, international competitors / coaches might be limited to the number of states/territories they might be able to train, compete or visit.

Closing remarks

Thankfully, the ACT, NSW and Commonwealth have and continue to recognise the wonderful sport of biathlon and are working with us with a view to ensuring biathlon continues to thrive.

Likewise, Biathlon Australia looks forward to working with other state/territory Governments, including Tasmania, regarding the impact that potential changes to firearm laws and regulations might have on the sport of biathlon.

Please contact me any time to discuss.

Yours sincerely

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