

Field & Game Australia

Submission – Firearms Amendment (Miscellaneous) Bill 2026

7 August 2026

Summary of FGA's Position

Field & Game Australia supports effective, evidence-based firearms regulation and measures that demonstrably improve community safety.

FGA **supports in principle** improved national firearms information sharing, implementation of the National Firearms Register, modernisation of dealer administration, and stronger measures targeting firearm theft, trafficking and criminal possession.

However, FGA does **not support additional restrictions, costs or administrative burdens on licensed firearm owners where a clear public-safety benefit has not been demonstrated.**

FGA's position on the principal changes is:

- **Straight-pull and button/lever-release firearms – OPPOSE.** FGA opposes their reclassification from Categories A and B to Category C. The Government has not demonstrated that these lawfully owned firearms present a materially greater public-safety risk than other manually operated firearms. The proposal would also require a taxpayer-funded buyback.
- **Magazine capacity restrictions – OPPOSE unless evidence is provided.** FGA does not support further restrictions on lawfully owned magazines without evidence demonstrating that the proposed limits will deliver a material public-safety benefit.
- **Additional licence security and verification – SUPPORT IN PRINCIPLE, subject to demonstrated benefit and reasonable cost.** FGA supports measures that genuinely improve the integrity of the licensing system. Any additional checks or licence-review requirements must deliver a demonstrable public-safety benefit and must not result in punitive or excessive costs for licence holders.
- **24-hour temporary storage notification – AMEND.** Ordinary temporary storage associated with hunting, competition, travel and other lawful activities should be expressly excluded. The requirement should principally apply where a firearm's normal or permanent storage location changes.
- **Lending and borrowing – AMEND.** FGA supports licence verification and preventing unauthorised on-lending. However, a lender should not be responsible for policing another licensed person's subsequent storage compliance.

- **Police inspection powers – CLARIFY.** FGA supports reasonable inspection powers but recommends that the legislation expressly allow firearms to be produced within a reasonable timeframe and at a reasonable place.
- **Advance notification of personal changes – AMEND.** Requiring notification seven days *before* a change is impractical and creates unnecessary opportunities for technical non-compliance. A reasonable post-change notification period should remain.
- **Interstate licence holders moving to Tasmania – AMEND.** The proposed seven-day application period is unnecessarily restrictive. FGA recommends **28 days**.
- **Stolen firearms, trafficking and criminal misuse – SUPPORT.** FGA supports appropriately strong measures directed at people who steal, traffic or unlawfully possess firearms. These measures appropriately focus regulation and enforcement on criminal behaviour rather than compliant licence holders.

FGA's central position

Firearms regulation should be targeted at an identified risk, proportionate to that risk, supported by evidence, and capable of delivering a demonstrable public-safety benefit.

FGA supports stronger measures where that test is met. We do not support imposing additional restrictions, costs or administrative burdens upon Tasmania's licensed firearm owners simply because further regulation is possible.

Detailed Submission

Field & Game Australia (FGA) welcomes the opportunity to provide feedback on the *Firearms Amendment (Miscellaneous) Bill 2026*.

FGA is a national member-based organisation representing recreational hunters, conservation volunteers and clay target shooters, including members and branches throughout Tasmania.

FGA supports effective, evidence-based firearms regulation. We support measures that demonstrably improve community safety, target criminal misuse of firearms, improve the tracing of stolen and illicit firearms, and enable police and regulators to administer firearms legislation effectively.

Accordingly, FGA supports in principle the objectives associated with implementation of the National Firearms Register (NFR), improved interstate information sharing, improved dealer record keeping, and stronger measures directed toward the theft, trafficking and unlawful possession of firearms. The consultation material identifies improved national information sharing and the ability to trace firearms throughout their lifecycle as central objectives of the NFR.

However, FGA's support for these objectives should not be interpreted as unconditional support for additional regulatory processes, costs or restrictions imposed upon licensed firearm owners.

Several provisions of the Bill impose significant new restrictions or administrative obligations without the consultation material demonstrating how those measures will materially improve public safety.

FGA believes firearms regulation should distinguish clearly between **criminal misuse of firearms and the lawful possession and use of firearms by licensed people**. New restrictions, administrative requirements and costs imposed upon the latter should be proportionate to an identified risk, supported by evidence, and capable of delivering a demonstrable public-safety benefit.

Reclassification of straight-pull and button/lever-release firearms

FGA opposes the proposed reclassification of straight-pull and button/lever-release firearms from Categories A and B to Category C.

The Bill would exclude straight-pull and button/lever-release shotguns from Category A, exclude relevant centre-fire rifles from Category B, and instead place these firearm types within Category C.

This is a substantial change affecting firearms that have been lawfully acquired and used by licensed Tasmanians for legitimate purposes, including recreational hunting and sporting use.

The consultation material does not identify evidence demonstrating that these firearms present a materially greater public-safety risk than other manually operated Category A and B firearms.

The Government itself acknowledges that the proposed reclassification will require a buyback and that negotiations remain underway with the Australian Government regarding funding.

Before proceeding with such a significant intervention, FGA believes Government should clearly demonstrate:

- **the specific public-safety risk being addressed;**
- **evidence that the affected firearms materially contribute to that risk;**
- **the number and value of firearms affected;**
- **the expected cost of the proposed buyback;**
- **the anticipated reduction in risk resulting from reclassification; and**
- **why less restrictive measures would not achieve the same objective.**

In the absence of such evidence, FGA recommends that straight-pull and button/lever-release firearms remain within their existing licence categories.

Magazine capacity restrictions

FGA also **opposes the proposed new magazine capacity restrictions unless Government can demonstrate an evidence-based need for the changes.**

The Bill would impose new limits including a 10-round detachable magazine limit for Category A rimfire rifles, a five-round magazine limit for Category A shotguns, and a 10-round detachable magazine limit for Category B centre-fire rifles.

The Bill also reduces an existing magazine threshold in section 118 from 15 rounds to 10 rounds.

The consultation information sheet describes these changes simply as being intended to "further enhance public safety".

FGA does not consider this, on its own, sufficient justification for restricting equipment lawfully owned and used by licensed firearm owners.

FGA requests that Government publish the evidence and risk assessment supporting these limits. In the absence of evidence demonstrating a material public-safety benefit, the existing arrangements should remain.

Licensing, verification and the cost of additional security measures

FGA recognises that implementation of the NFR and associated changes to licence and permit verification may require Tasmania Police to introduce new systems, processes or security measures.

The Bill introduces a new concept of "verify", requiring a licence or permit to be verified in an approved manner together with other reasonable steps to establish that it is valid, in force and being relied upon by its actual holder. These verification requirements are then incorporated into transactions involving firearms and other regulated activities.

FGA supports genuine improvements to the integrity and security of the licensing system where they provide a demonstrable public-safety benefit.

However, **additional security or verification requirements should not become a mechanism for imposing punitive or excessive costs upon licensed firearm owners.**

Licensed firearm owners already bear the costs associated with complying with a substantial regulatory framework. The introduction of additional background checks, identity verification, information-system requirements, licence reviews or other security processes should therefore be assessed on the same evidence-based basis as any other regulatory intervention.

Before imposing additional costs upon licence applicants or existing licence holders, Government should be able to demonstrate:

- the particular risk or deficiency being addressed;
- how the proposed measure will materially reduce that risk;

- that the measure is proportionate to the risk identified;
- that less costly alternatives have been considered; and
- that any fee charged reflects the reasonable cost of administering the regulatory function rather than operating as a financial barrier to lawful firearm ownership.

FGA would be particularly concerned by any future approach under which additional security measures associated with licence applications, renewals or reviews resulted in substantial increases in licensing costs without a corresponding and demonstrable improvement in community safety.

Public safety should be the test—not simply the addition of another process.

Where additional checking is genuinely necessary in the public interest, the cost should not automatically or disproportionately be transferred to the individual licence holder.

Temporary storage away from a residential address

FGA has significant concerns regarding the proposed requirement for a licence holder to notify Tasmania Police where a firearm will be stored somewhere other than the licensee's residential address for more than 24 hours.

The consultation material confirms that this obligation applies where firearms are intended to be stored at another location for a period greater than 24 hours.

Hunters and sporting shooters routinely travel away from their residential address for more than 24 hours. Firearms may be lawfully and securely stored at accommodation, hunting properties, club facilities or another licensed person's premises during multi-day hunting trips, competitions and other legitimate activities.

There is no apparent public-safety benefit in requiring Tasmania Police to maintain a running record of every temporary location at which a firearm may be lawfully stored during such activities.

It also risks creating inadvertent technical non-compliance by otherwise responsible licence holders.

FGA recommends that the provision apply to a **change in the firearm's ordinary or permanent storage location**, rather than temporary lawful storage associated with travel, hunting, competition or other legitimate activities.

At minimum, an express exemption should apply to temporary storage while a licence holder is travelling, hunting, competing or otherwise lawfully using a firearm.

Lending and borrowing firearms

FGA supports the principle that firearms should only be lent to people who are appropriately licensed and that firearms should remain securely stored.

We also accept the rationale for preventing a person who has borrowed a firearm from subsequently lending that firearm to another person without the owner's knowledge.

However, proposed section 121A goes considerably further by requiring the lender to ensure that the borrower has the means to comply with storage requirements and intends to comply with them. Failure to meet these obligations carries a penalty of up to 50 penalty units or two years imprisonment, or both.

FGA considers it unreasonable to make one private licence holder responsible for determining another licence holder's compliance with firearm storage requirements.

FGA recommends that a lender instead be required to verify that the borrower holds the appropriate current firearms licence and obtain confirmation from the borrower that the firearm will be stored in accordance with the Act.

Responsibility for the borrower's subsequent storage and conduct should rest with the borrower.

Production of firearms for police inspection

The Bill inserts a new section 82A requiring any person possessing a firearm to produce that firearm for inspection "at any reasonable time" when requested by a police officer.

FGA does not object to police having reasonable powers to inspect firearms for legitimate regulatory or law-enforcement purposes.

However, the provision should make clear what constitutes a reasonable request and a reasonable timeframe for compliance.

A person may lawfully possess a firearm while not having immediate physical access to it. FGA therefore recommends that the provision expressly require production **within a reasonable period and at a reasonable place**, having regard to the circumstances.

Notification of changes to personal particulars

The Bill proposes changing the existing requirement to notify a change in particulars within 14 days after the change to a requirement that notification occur at least seven days beforehand.

FGA does not see a compelling reason for this change.

Many changes in personal circumstances cannot reasonably be predicted seven days in advance. Creating an advance notification requirement unnecessarily increases the prospect of technical non-compliance without any obvious corresponding improvement in public safety.

FGA recommends retaining a reasonable period for notification **after the change occurs**.

Interstate licence holders moving to Tasmania

FGA also questions the proposed reduction in the period available to an interstate firearm licence holder moving permanently to Tasmania.

The consultation material states that interstate residents intending to reside in Tasmania will have seven days to apply for a Tasmanian licence across all categories, compared with the previous three-month period applying to Category A and B licence holders.

The Bill provides continuity where an application is lodged within the seven-day period and remains undetermined.

Nevertheless, seven days is an unnecessarily short administrative timeframe for someone relocating interstate.

FGA recommends a **28-day application period**. This would still require prompt compliance while providing a realistic timeframe for people undertaking an interstate relocation.

Measures directed toward criminal misuse

FGA supports the Government focusing enforcement resources and legislative measures upon the criminal acquisition, theft, trafficking and misuse of firearms.

The Bill increases penalties relating to possession of stolen firearms, creates a specific offence concerning stealing a firearm or firearm part, provides for alternative conviction for possession of a stolen firearm in certain trafficking proceedings, and introduces a presumptive minimum imprisonment period for specified firearms offences, subject to exceptions available to the court.

These provisions are fundamentally different from restrictions imposed upon people who have undergone firearms licensing requirements and continue to lawfully possess and use registered firearms.

FGA supports maintaining that distinction as a central principle of firearms policy.

Conclusion

FGA supports sensible firearms reform where it is **targeted, proportionate, affordable and supported by evidence**.

We support the objectives of improved national firearms information sharing, implementation of the National Firearms Register, modernisation of dealer administration, and stronger measures addressing firearm theft, trafficking and criminal possession.

However, lawful firearm ownership should not be restricted, made substantially more expensive or administratively burdensome simply because further regulation is possible.

Where Government proposes to remove firearms from existing licence categories, prohibit equipment presently lawfully possessed, introduce additional security or verification requirements, increase the cost of licensing, impose new reporting obligations or create significant new offences for licensed firearm owners, there should be a clearly identified problem and evidence demonstrating that the proposed measure will materially address it.

On that basis, Field & Game Australia recommends that the Government:

1. **not proceed with the Category C reclassification of straight-pull and button/lever-release firearms without demonstrating an evidence-based public-safety case for doing so;**
2. **retain existing magazine capacity arrangements unless evidence demonstrates that the proposed reductions will materially improve public safety;**
3. ensure any additional security, verification or licence-review requirements have a demonstrated public-safety benefit and **do not result in punitive or excessive increases in licensing costs;**
4. amend the storage-location notification requirement so that ordinary temporary storage associated with hunting, competition and travel is excluded;
5. amend the lending provisions so that a lender is responsible for reasonably verifying the borrower's licence, but not for policing another licence holder's subsequent storage compliance;
6. clarify that firearms requested for police inspection must be produced within a reasonable timeframe and at a reasonable place;
7. retain a reasonable post-event period for notification of changes in personal particulars; and
8. provide interstate licence holders relocating to Tasmania with at least 28 days to lodge an application for a Tasmanian firearms licence.

FGA would welcome the opportunity to discuss these matters further with the Tasmanian Government and Tasmania Police.

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Field & Game Australia Inc.