Firearms Amendment (Miscellaneous) Bill 2026

CONSULTATION SUBMISSION

From Firearm Owners United

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FIREARM OWNERS UNITED

Contents

Introduction

Firearm Owners United (FOU) is a national advocacy organisation representing law-abiding firearms owners, hunters, and participants in the sporting and recreational shooting community. The organisation is supported by a volunteer leadership and advisory group with diverse professional experience, including former Defence personnel, security and information technology specialists, agricultural professionals, accredited firearms instructors, competitive sporting shooters, and hunters.

This submission responds to the Proposals contained in the Consultation Information Sheet and sets out FOU's considered views on the subject matter. It addresses the structure, implementation, and likely impacts of the proposals implemented elsewhere and, where relevant, draws on available evidence and comparative experience from other jurisdictions.

FOU's intent is to contribute constructively to the review process and to support reforms that genuinely enhance community safety while maintaining fairness, proportionality, and consistency within Tasmania's firearms regulatory framework. We believe effective regulation must be grounded in evidence, focused on demonstrable risk, and balanced against the legitimate interests of lawful firearms users engaged in sporting, hunting, and occupational activities.

FOU acknowledges the compressed timeframe and limited consultation associated with this review. Notwithstanding these constraints, this submission has been prepared in good faith and seeks to provide a clear, reasoned, and evidence-based contribution to the Government's deliberations. We respectfully request that these views be considered in that context.

Areas of scope highlighted in the Consultation Information Sheet

1. Reclassification of straight pull and button/lever release centre-fire rifles and shotguns

Recent legislative changes implemented in New South Wales and at the Commonwealth level have resulted in pump-action rifles and straight-pull repeating rifles being reclassified into the same licensing categories as semi-automatic firearms of similar types. It is the view of our organisation that these restrictions are unwarranted and unsupported by evidence.

Some arguments advanced in support of these changes rely on claims that straight-pull firearms represent a novel technology not contemplated by the 1996 National Firearms Agreement. This assertion is historically incorrect. Straight-pull bolt-action rifles were developed alongside conventional repeating bolt-action rifles in the late nineteenth century, with the first commercially successful straight-pull rifles entering large-scale production in 1885. Numerous models were produced and widely adopted across Europe throughout the late nineteenth and early twentieth centuries. These firearms are therefore not a modern innovation but a long-established mechanical design.

The application of straight-pull mechanisms to shotguns represents only a minor adaptation driven largely by niche manufacturing aimed at compliance with Australian regulatory frameworks. Internationally, repeating and semi-automatic shotguns are commonly licensed sporting firearms. Even in highly restrictive jurisdictions such as the United Kingdom, Japan, and New Zealand, semi-automatic and pump-action shotguns remain lawful under regulated licensing schemes. Australia stands largely alone in treating these common sporting firearms as uniquely dangerous. Proposals to further restrict repeating firearms lack proportionality and do not align with international best practice.

The assertion that further restrictions on these firearms would materially enhance public safety is not supported by evidence. Rather, such measures risk criminalising ordinary sporting and hunting firearms that have a long history of lawful civilian use.

Button or lever release firearm

1. Modern “assisted action” repeating firearms, marketed as lever-release or button-release systems, do represent a limited degree of recent mechanical innovation. However, the concept of assisted cycling mechanisms is not new. Historical antecedents can be traced to military and industrial designs dating back to the early twentieth century, including the Lahti L-39 first introduced in 1939.

These systems remain manually operated firearms and do not function as self-loading or semi-automatic weapons. Their regulation should therefore be based on their actual mechanical operation and risk profile rather than marketing terminology or perceived novelty. Treating assisted-action repeating firearms as equivalent to semi-automatic firearms disregards both their technical characteristics and their practical use in lawful sporting contexts.

Regulatory approaches should be grounded in functional capability and demonstrable risk, rather than speculative concerns about emerging design variations.

Furthermore the simple functional reality of these firearms places them well behind the other types of firearms captured within Category C, there is simply no appeal to using a straight pull bolt shotgun when the same license will permit ownership of a semiautomatic shotgun.

We do support the exclusion of rimfire rifles from the proposed changes, these firearms in particular being primarily low powered .22lrs are not a risk to public safety. They are also heavily used in international shooting competitions with the Olympic Biathlon event exclusively using straight pull rimfire rifles.

2. Citizenship restrictions

Under the current framework, an individual must be a resident of the State in order to hold a firearms licence. This requirement is consistent with the approach adopted across other Australian states and territories and reflects broader licensing norms that link regulatory responsibility to residency. We consider this approach sensible and appropriate and see no compelling justification for altering this aspect of the licensing scheme.

We note recent proposals and legislative changes in New South Wales that would restrict firearms licences exclusively to Australian citizens, thereby excluding permanent residents. We do not support this approach. Permanent residents of Australia are already subject to extensive background checks, character assessments, and ongoing scrutiny under Commonwealth migration and security frameworks. If an individual is considered unsuitable to hold a firearms licence on public safety grounds, it is difficult to reconcile this with that same individual being considered suitable to reside permanently within the community. Issues of character, security risk, and lawful presence are more appropriately addressed through federal immigration and law enforcement mechanisms rather than through firearms licensing status alone.

It is also notable that permanent residents are currently eligible to serve in the Australian Defence Force and in policing and protective services roles, positions that require rigorous vetting and involve access to firearms and other controlled equipment in the course of duty. These individuals are entrusted by the State with responsibilities that directly engage public safety and national security interests. In this context, it is difficult to reconcile a policy position that would deem the same individuals suitable for service in the ADF or Tasmanian Police, yet categorically unsuitable to hold a firearms licence for lawful sporting, hunting, or occupational purposes. Such an approach introduces an internal inconsistency in public policy that is not grounded in individual behaviour or risk, but solely in legal status.

Restricting firearms licences on the basis of citizenship rather than demonstrated conduct or assessed risk introduces an arbitrary distinction that is not clearly linked to improved public safety outcomes. Licensing systems are most effective when they focus on individual behaviour, compliance history, and objective risk indicators rather than legal status unrelated to firearm use.

It is also important to recognise that highly motivated offenders may seek alternative means to cause harm if access to one particular method is removed. Public safety policy should therefore prioritise identifying and managing high-risk individuals rather than relying on broad exclusions that target lawful residents as a class. Measures that are not grounded in evidence of risk reduction may create a false sense of security while undermining fairness and consistency in the licensing system.

A residency-based licensing framework, supported by robust background checks, information sharing, and ongoing compliance monitoring, remains a more proportionate and effective approach than introducing citizenship-based exclusions that are disconnected from individual suitability or demonstrated risk.

3. Lending of firearms to third parties.

Firearm Owners United supports the proposal to prohibit a person who has borrowed a firearm from on-lending that firearm to another person.

A firearm owner should be entitled to decide who may temporarily possess their firearm. Allowing a borrower to transfer possession to a third party without the owner's direct knowledge or consent weakens accountability, complicates the chain of possession, and increases the risk of a firearm being lost, misplaced or held by a person whose licensing and storage arrangements have not been verified by the owner.

Repeated on-lending could also make it difficult for the registered owner or police to establish who presently possesses the firearm. Conduct of this nature would already be viewed with considerable scepticism and disapproval within the responsible firearms community.

Proposed section 121A appropriately preserves ordinary lending between licensed persons while providing that a borrower must not subsequently on-lend the firearm. FOU considers this a reasonable and proportionate safeguard and supports the proposal.

4. Verification of borrowers license and storage facility.

Firearm Owners United supports requiring a person lending a firearm to sight and verify that the borrower holds a current licence or permit authorising possession of that firearm. However, we do not support the proposed requirement that the lender must also "ensure" that the borrower has the means and intention to comply with the applicable storage requirements.

The proposed section does not explain what steps a lender must take to satisfy this obligation. It is unclear whether the lender would be expected merely to ask the borrower, obtain a declaration, inspect the proposed storage facility, request photographs or independently assess whether the facility complies with the legislation. This uncertainty is particularly concerning because a breach would carry a maximum penalty of 50 penalty units or two years' imprisonment.

Requiring private licence holders to inspect or evaluate another person's storage arrangements is neither practical nor appropriate. An ordinary licence holder is not a compliance inspector and may not have the expertise or authority to determine whether another person's safe, installation or temporary storage arrangements satisfy every legislative requirement. Requiring borrowers to disclose photographs, locations or detailed information about their firearms storage may also create unnecessary security and privacy risks.

The Bill expressly provides that a lent firearm is in the possession of the borrower for the purposes of the Act. The borrower should therefore bear responsibility for ensuring that the firearm is lawfully and securely stored while it is in their possession. The lender should be entitled to rely upon the borrower's valid firearms licence and, at most, a confirmation from the borrower that compliant storage is available and will be used.

FOU recommends that Tasmania Police establish a secure online licence-verification service. Queensland Police currently provides an online tool through which a person can enter the details shown on a weapons licence and confirm whether its status can be validated, while still requiring the physical licence card to be sighted. A similar system would give Tasmanian licence holders a reliable and practical means of satisfying the proposed licence-verification obligation.

Accordingly, FOU supports proposed section 121A(2)(a), subject to the availability of a practical verification system, but recommends that section 121A(2)(b) be removed or amended so that a lender is required only to obtain the borrower's confirmation that suitable storage is available and will be used. Responsibility for actual compliance should remain with the borrower while the firearm is in their possession.

5. Definition update

Firearm Owners United has no objection to the proposed updates to terminology and definitions within the Firearms Act 1996.

Changes such as replacing “pistol” with “handgun” and “firearm sound suppressor” with “suppressor” will improve consistency with terminology used in other Australian jurisdictions and in the National Firearms Register.

Clear and nationally consistent definitions can reduce uncertainty for licence holders, dealers, police and courts. Subject to the definitions being applied consistently and not unintentionally expanding the scope of existing offences or restrictions, FOU supports the proposed changes.

6. The definition of ‘firearm’ and ‘firearm part’ are to be clarified following the receipt of expert advice.

We support clarifying the definitions of "firearm" and "firearm part" where this improves legal certainty for licence holders, dealers, armourers and law enforcement. Clear definitions reduce ambiguity and assist with consistent administration of the Firearms Act.

Any revised definition should be precise and limited to components that are essential to the safe operation of a firearm. It should avoid unintentionally capturing accessories, cosmetic items or aftermarket components that are not pressure-bearing or critical to the functioning of the firearm.

We support definitions that align with the National Firearms Register and promote consistency across Australian jurisdictions, provided they do not unnecessarily broaden the scope of regulated items beyond what is required for public safety.

7. Requirement to notify if firearms are being stored elsewhere for over 24 hours.

Firearm Owners United opposes the proposed requirement to notify the Commissioner whenever a firearm is to be stored somewhere other than the licence holder’s residential address for more than 24 hours.

A period of 24 hours is unreasonably short and would capture many routine and lawful activities. Firearm owners regularly undertake hunting trips, pest-control work, training activities and shooting competitions that extend over several days. Interstate travel may also require firearms to be stored temporarily at accommodation, a shooting range, a dealer’s premises or another lawful storage location. None of these circumstances represents a permanent or meaningful change in the ordinary storage arrangements for the firearm.

The licence holder remains legally responsible for ensuring that the firearm is securely stored while travelling or temporarily away from home. Requiring notification of every temporary location does not strengthen that existing obligation or ensure that the firearm is stored more securely. FOU does not consider that the proposal provides a demonstrated public-safety benefit proportionate to the administrative burden it would impose.

The amendment would instead generate a substantial volume of short-term notifications for Tasmania Police to receive, process and maintain. It could also result in registry information becoming inaccurate or outdated as firearms move between temporary locations during a single trip. The Bill would require notification at least 24 hours before the change or, where advance notice was not possible, within 24 hours after it occurred. This creates a significant risk of otherwise responsible licence holders committing technical breaches through ordinary travel arrangements or unexpected changes of plans.

FOU recommends that proposed section 46(bb) be removed. If the Government considers some notification requirement necessary, it should apply only where a firearm is relocated to another address as its regular or long-term storage location, rather than to temporary storage associated with lawful travel, hunting, competition, pest control, repair or other legitimate activities.

8. If a firearms owner intends to change residential address, the owner must notify Tasmania Police 24 hours before that change of address, or as soon as practicable after that change is made.

We do not support the proposal requiring firearms licence holders to notify Tasmania Police 24 hours before changing residential address, or as soon as practicable after the change occurs.

While we acknowledge the importance of maintaining accurate address records for licensed firearm owners, a 24-hour notification requirement is unnecessarily restrictive, impractical, and unlikely to provide any measurable improvement to public safety.

Residential moves often involve circumstances that cannot always be predicted or controlled, including changes to settlement dates, rental arrangements, employment requirements, family circumstances, or other unforeseen events. Requiring notification within such a short timeframe creates an unnecessary compliance burden on responsible firearms owners and may result in otherwise compliant individuals inadvertently breaching the legislation.

A notification period of 7 to 14 days after a change of residential address provides a more reasonable and practical balance between maintaining accurate licensing records and allowing licence holders sufficient time to comply. This approach is consistent with the broader approach adopted in a number of Australian jurisdictions.

The existing requirement to notify changes of personal particulars within a reasonable timeframe already provides an effective mechanism for ensuring records remain current without imposing unnecessary administrative burdens.

Accordingly, we recommend that the proposed 24-hour notification requirement not proceed and that a more practical post-change notification period of 7 to 14 days be adopted.

9. There will be increased scope for firearms dealer employees to possess and handle firearms and firearm parts, as well as purchase and sell firearms in the absence of the holder of the firearms dealer licence.

We support the proposal to increase the scope for authorised firearms dealer employees to possess and handle firearms and firearm parts, and to undertake the purchase and sale of firearms in the absence of the holder of the firearms dealer licence.

Licensed firearms dealers play a critical role in ensuring that firearms transactions are conducted lawfully, safely and in accordance with the requirements of the Firearms Act. Modern firearms businesses often rely on trained and experienced employees to carry out day-to-day operations, and it is appropriate that legislation reflects these operational realities.

Provided that employees are appropriately licensed, have undergone the required background checks, and are authorised by the licensed dealer, there is little practical benefit in requiring the licence holder to be physically present for routine transactions. Allowing suitably qualified employees to perform these functions will improve business efficiency, reduce unnecessary administrative constraints, and provide greater flexibility for dealers without diminishing public safety.

Importantly, the responsibility and accountability for compliance with the Firearms Act should remain with the licensed firearms dealer, who must ensure that all employees are properly trained, understand their legal obligations, and comply with all record-keeping, storage and transaction requirements.

This amendment recognises that licensed dealer employees are already entrusted with handling firearms as part of their employment and that expanding their authorised responsibilities, within an appropriate regulatory framework, represents a practical and sensible modernisation of the legislation.

Accordingly, we support this proposal, provided that only suitably licensed and authorised employees are permitted to exercise these powers and that existing safeguards relating to licensing, record keeping, secure storage and regulatory oversight remain in place.

10. Timeframe for interstate residents to apply for a Tasmanian licence.

Firearm Owners United opposes reducing the application period for interstate Category A and B licence holders from three months to seven days.

An interstate relocation is a substantial undertaking involving accommodation, employment, transport, establishment of compliant firearm storage and numerous other administrative obligations. Requiring a person to complete a Tasmanian firearms licence application within seven days is unnecessarily restrictive and creates a significant risk of technical non-compliance during an already demanding period.

The Bill provides that the person's corresponding interstate licence will continue beyond the seven-day period where a Tasmanian application has been lodged within that period and remains undecided. However, this does not address the underlying concern that seven days is an impractically short period in which to prepare and submit the application.

FOU is not aware of any identified public-safety issue arising from the existing three-month period for Category A and B licence holders. The affected person remains licensed in another Australian jurisdiction and subject to applicable possession, transport and storage requirements. In the absence of evidence that the present timeframe has caused regulatory or community-safety problems, there is no demonstrated need for such a substantial reduction.

FOU recommends retaining the existing three-month period. If the Government nevertheless considers a nationally consistent shorter period necessary, a minimum of 28 days would provide a more practical and proportionate timeframe while still requiring a prompt transition to the Tasmanian licensing system. The proposed seven-day period should not proceed.

11. A firearms licence holder must notify Tasmania Police at least 7 days before a change in personal particulars. This was previously within 14 days after the change.

We do not support the proposal requiring firearms licence holders to notify Tasmania Police at least seven days before a change in personal particulars.

While we support the need for Tasmania Police to maintain accurate and current licensing records, we consider this proposed amendment to be overly intrusive, unnecessarily burdensome, and unlikely to provide any meaningful improvement to public safety.

The existing requirement for licence holders to notify Tasmania Police within 14 days after a change provides a practical and reasonable timeframe that allows accurate records to be maintained while recognising that personal circumstances and changes of particulars do not always occur with advance notice.

A requirement to notify authorities before a change occurs places an unnecessary obligation on otherwise compliant licence holders and may create situations where individuals become non-compliant due to circumstances outside their control. The current 14-day notification period achieves the appropriate balance between regulatory oversight and practical compliance.

Accordingly, we recommend that the existing requirement for notification within 14 days after a change remain unchanged.

12. Extending the obligation to produce a firearm for inspection.

Firearm Owners United has no objection to the proposed amendment extending the obligation to produce a firearm for inspection to any person who is in possession of it, rather than limiting that obligation to the firearm's registered owner.

A person who has lawfully borrowed or otherwise taken possession of a firearm should be subject to the same reasonable inspection requirements that would apply to its owner. Proposed section 82A appropriately limits the obligation to production at a reasonable time and upon the request of a police officer.

FOU considers this a practical and proportionate amendment that removes an unnecessary gap in the existing inspection framework.

13. Changes to how matters involving firearm theft, trafficking and possession of stolen firearms can be prosecuted.

Firearm Owners United supports the proposed changes to the way offences involving firearm theft, unlawful trafficking and possession of stolen firearms may be prosecuted. The amendments provide courts and prosecutors with more practical options for dealing with offending according to its seriousness, while retaining the availability of indictment for the most serious cases.

In particular, FOU supports allowing possession of a stolen firearm to operate as an alternative conviction where a person charged with unlawful trafficking is acquitted of that offence, but the evidence nevertheless proves possession of a stolen firearm. This avoids an offender escaping liability merely because the prosecution cannot establish every element of the more serious trafficking charge.

We also support allowing unlawful trafficking and possession of stolen firearm offences to be determined summarily where both the prosecution and defendant consent. Requiring agreement from both parties provides an appropriate safeguard while avoiding the delay and expense of Supreme Court proceedings in cases that do not warrant prosecution on indictment. The creation of a corresponding summary offence for stealing a firearm or firearm part similarly provides a proportionate and efficient means of holding offenders accountable.

These amendments do not diminish the seriousness of firearm theft or trafficking. Rather, they improve the flexibility and efficiency of the justice system while preserving more serious prosecution pathways and substantial penalties where the circumstances warrant them. FOU considers the changes reasonable, practical and appropriately directed toward ensuring that offenders are held accountable for the conduct that can be established by the evidence.

14. A firearm prohibition order will now apply not only to firearms, but will also apply to firearm parts, ammunition and suppressors.

We support the proposal to extend firearm prohibition orders to include firearm parts, ammunition and suppressors, in addition to firearms.

This amendment strengthens the effectiveness of firearm prohibition orders by ensuring that individuals who are prohibited from possessing firearms are also prevented from possessing the key components and accessories necessary for their operation or use. It provides greater clarity in the legislation, closes potential regulatory gaps, and supports the intent of keeping firearms and related items out of the hands of prohibited persons.

Provided that appropriate safeguards and review processes remain available, we consider this to be a practical and proportionate amendment that enhances public safety while improving the enforceability of the existing legislative framework.

Accordingly, we support this proposal.

15. The introduction of magazine ammunition capacity limits for some category A and B firearms to further enhance public safety.

We acknowledge and support the Tasmanian Government's objective of improving public safety and reducing the risk of firearms being misused. Lawful firearm owners share the goal of ensuring firearms remain in the hands of fit and proper persons and that criminal access to firearms is prevented.

However, we do not support the proposed introduction of detachable magazine capacity limits for Category A and Category B firearms.

Tasmania already operates one of Australia's most comprehensive firearms licensing and registration systems. Firearm owners are subject to stringent licensing requirements, genuine reason tests, mandatory secure storage standards, ongoing police oversight, and significant penalties for non-compliance. These measures have provided a strong regulatory framework for many years.

While it is recognised that most other Australian jurisdictions have adopted similar magazine capacity limits, consistency between jurisdictions should not, by itself, be regarded as sufficient justification for introducing additional restrictions in Tasmania. Regulatory harmonisation is a worthwhile objective only where there is clear evidence that the proposed measure will produce a measurable improvement in public safety.

To date, there appears to be limited publicly available evidence demonstrating that detachable magazine limits for manually operated Category A and B firearms have significantly reduced firearm crime or prevented criminal offending in those jurisdictions where they already exist.

As such, it is difficult to conclude that introducing equivalent restrictions in Tasmania would deliver a meaningful public safety benefit.

The proposed amendments themselves recognise an important distinction by exempting firearms with fixed or tubular magazines because they cannot be reloaded as rapidly as detachable magazine systems. This highlights that the proposal is directed at a relatively narrow class of lawful sporting and hunting firearms rather than addressing the primary sources of illicit firearm use.

The consultation materials also place considerable emphasis on combating firearm theft, improving national firearms registration through the National Firearms Register, increasing penalties for firearm trafficking and possession of stolen firearms, and strengthening information sharing between jurisdictions. These initiatives are more directly targeted at the criminal misuse of firearms and are likely to have a greater impact on community safety than imposing further restrictions on licensed firearm owners.

We respectfully submit that legislative reform should be guided by evidence demonstrating effectiveness rather than by achieving uniformity with other jurisdictions. Where existing laws have proven effective in regulating lawful firearm ownership, additional restrictions should only be introduced where there is a demonstrated and measurable public safety benefit.

Accordingly, we recommend that the proposed magazine capacity limits for Category A and Category B firearms not proceed unless supported by clear empirical evidence that they will materially reduce firearm-related crime or improve public safety in Tasmania. Instead, resources should continue to focus on preventing firearm theft, disrupting illicit firearm trafficking, enforcing existing firearms legislation, and ensuring only fit and proper persons retain access to firearms.

16. The updating of identification requirements for licence applications as the Act currently references repealed Commonwealth legislation.

We support the proposal to update the identification requirements for firearms licence applications where the current legislation references repealed Commonwealth legislation.

It is important that the Firearms Act contains accurate and up-to-date legislative references to ensure clarity for applicants, licensing authorities and those responsible for administering the Act. Updating outdated references will improve legal certainty, reduce the potential for confusion, and ensure the legislation reflects the current Commonwealth identification framework.

As this proposal is administrative in nature and does not reduce the existing standards for identity verification or public safety, we consider it to be a sensible and necessary amendment that supports the effective administration of Tasmania's firearms licensing system.

Accordingly, we support this proposed amendment.

17. Creation of a mandatory minimum sentence of three months' imprisonment for being caught in possession of a stolen firearm or for stealing a firearm.

The theft of firearms is a serious criminal offence that directly contributes to the diversion of firearms into the illicit market and creates an ongoing risk to police and the wider community. Possessing or trafficking stolen firearms perpetuates that harm by providing a market for further theft and placing firearms into the hands of persons operating outside the licensing and registration system.

Such conduct also directly affects law-abiding firearm owners. Targeted thefts may involve offenders entering homes, farms or licensed businesses in search of firearms, exposing licence holders, their families, employees and other occupants to confrontation, violence and serious injury. These offences impose substantial financial and personal costs upon victims, undermine the integrity of the licensing system, and create significant investigative and recovery burdens for law enforcement agencies.
FOU therefore recommends that the Government consider a substantially higher minimum sentence where the theft of firearms is committed in aggravated circumstances. Where an offender uses or threatens violence, unlawfully enters an occupied residence or business, or assaults and causes serious injury to a licence holder or another occupant in the course of obtaining firearms, we consider that a minimum term of at least five years' imprisonment would appropriately reflect the gravity of the conduct. This aggravated provision should apply equally where the victim is a dealer, employee, family member or other person present at the premises.

We note that the proposed sentencing provision is not entirely inflexible. A court may decline to impose the three-month minimum where the offender was under 18, where relevant impaired mental functioning exists, or where imprisonment would be unjust having regard to the circumstances of the offence or offender. These safeguards appropriately preserve limited judicial discretion and reduce the risk of disproportionate outcomes in exceptional cases.

Subject to those safeguards, FOU considers the reform a reasonable and targeted response to serious criminal conduct involving illicit firearms. It reinforces the distinction between responsible licensed ownership and criminal misuse and sends a clear message that stealing, knowingly retaining or trafficking stolen firearms will attract meaningful custodial consequences.

18. The updating of sections 91 and 93 to allow dealer record keeping to be made and held electronically, in readiness for the implementation of the NFR.

Firearm Owners United fully supports the proposed amendments to sections 91 and 93. Tasmania currently lags behind other Australian jurisdictions in permitting licensed firearms dealers to maintain and submit their statutory records electronically. Modern electronic record-keeping systems can improve accuracy, reduce transcription and reporting errors, simplify auditing, and reduce the administrative burden placed on both dealers and Tasmania Police.

The amendments sensibly allow alterations to dealer records to be made in an approved manner and remove the requirement to submit a separate quarterly return where the required information has already been provided to the Commissioner through an approved system. This will reduce unnecessary duplication and assist Tasmania in preparing for integration with the National Firearms Register.

Implementation should occur in consultation with licensed dealers and be supported by clear technical standards, practical transition arrangements, and reliable fallback procedures for system outages. Subject to these considerations, FOU considers this a worthwhile and overdue modernisation of Tasmania’s firearms administration and fully supports the proposal.

Concluding remarks

Firearm Owners United supports reforms that are practical, evidence-based and directed toward identifiable risks to community safety. As outlined throughout this submission, we support a number of the Bill's administrative and enforcement measures, including the prohibition on on-lending borrowed firearms, the expanded role of appropriately licensed dealer employees, updated identification and terminology provisions, electronic dealer record keeping, improved prosecution options for firearm theft and trafficking, and stronger consequences for the theft and possession of stolen firearms.

However, other proposals would impose substantial restrictions and administrative obligations upon compliant licence holders without a demonstrated or proportionate public-safety benefit. In particular, FOU does not support the proposed reclassification of manually operated straight-pull and assisted-action firearms, citizenship-based licensing restrictions, detachable magazine limits, the seven-day application period for incoming interstate residents, or the proposed advance-notification requirements for temporary storage, changes of address and personal particulars. We also consider it impractical and inappropriate to make an ordinary lender responsible for independently verifying another licence holder's storage facilities.

Effective firearms regulation should focus on individual suitability, criminal conduct, secure storage, accurate records and the disruption of illicit firearm markets. It should not create unnecessary technical offences or administrative burdens that primarily affect people who are already licensed, monitored and attempting to comply with the law. Where additional restrictions are proposed, the Government should identify the specific risk being addressed and demonstrate that the measure is reasonably capable of producing a meaningful improvement in community safety.

FOU encourages the Tasmanian Government to continue consulting with licensed firearm owners, dealers, clubs, primary producers and other affected stakeholders before finalising the Bill. These groups possess substantial practical experience and can assist in identifying unintended consequences, implementation difficulties and more effective alternatives. Genuine consultation will help ensure that the final legislation is clear, workable and supported by those required to comply with and administer it

Yours Sincerely,

[redacted]

Firearm Owners United