



SUBMISSION

Firearms Amendment Bill 2026

North West Hound Owners Association (Devonport Branch)
6 August 2026

To:

The Hon. Felix Ellis MP
Minister for Police, Fire and Emergency Management
Department of Police, Fire and Emergency Management

Summary

The North West Hound Owners Association (Devonport Branch) appreciates the opportunity to provide this submission regarding the Firearms Amendment Bill 2026.

Our association is a small but highly passionate group, consisting of three branches along the coast: Devonport, Latrobe, and Burnie. Our membership, which includes up to 100 financial members in each branch, primarily consists of individuals who own and hunt with dogs for wallaby in Tasmania. While some members own hunting dogs, others participate as part of hound hunting parties. These parties work closely with private landowners, Sustainable Timber Tasmania, NRE Game Services, and Tasmanian Parks and Wildlife to secure access to hunting areas across the state. Our members rely on dogs to aid in flushing and retrieving wallabies in the field.

Our members use firearms for lawful hunting, pest animal control, recreational shooting and participation in organised hunting activities. We support sensible firearms regulation, rigorous licensing standards and strong action against criminal misuse of firearms. We also support legislation that is practical, evidence based and proportionate.

We strongly support stronger penalties for theft of firearms and possessing stolen firearms. However, we oppose a number of the proposed amendments because they impose additional restrictions on compliant licence holders without demonstrating that they will improve public safety.

Reclassification of Straight Pull and Button or Lever Release Firearms

The NWHOA strongly opposes the proposed reclassification of straight pull and button or lever release rifles and shotguns from Category B to Category C.

This proposal represents one of the most significant changes contained within the Bill and, in our view, has not been supported by evidence demonstrating that these firearms present an increased risk to public safety within Tasmania.

Straight pull and button or lever release firearms remain manually operated firearms - unlike self-loading firearms, the shooter must physically operate the action after every shot before another round can be chambered. While these actions may provide a different method of cycling compared with traditional bolt-action firearms, they do not alter the fundamental fact that they remain manually operated. The technology itself is far from new, with straight pull rifles having existed for well over one hundred years and have been used safely throughout Europe and other parts of the world for generations.

Importantly, these firearms have been lawfully owned and used within Tasmania for many years without being identified as presenting a unique public safety concern. The consultation material accompanying the

Bill does not provide Tasmanian data demonstrating that licensed owners of these firearms are responsible for increased criminal offending, increased accidental injury, or any pattern of misuse that would justify such a significant change in classification.

The NWHOA is concerned that this proposal appears to have arisen largely from a desire for national consistency following the Bondi incident rather than from any evidence demonstrating a Tasmanian problem requiring legislative intervention. The Bondi tragedy highlighted failures relating to the administration and enforcement of existing laws rather than shortcomings in the operation of manually operated straight pull firearms. Publicly available information from the subsequent reviews indicates concerns surrounding the application of existing licensing processes and information sharing between agencies. Reclassifying firearms lawfully owned by licensed Tasmanians does not address those issues.

The Association believes legislation should respond to demonstrated risks rather than isolated events occurring in different jurisdictions under different circumstances.

For many members, straight pull and lever release firearms are valuable hunting tools. Hunters sometimes require rapid follow-up shots when undertaking humane euthanasia of injured animals or controlling feral species, and being able to maintain sight alignment while manually cycling the action allows wounded animals to be dispatched quickly and humanely, reducing unnecessary suffering. This represents an important animal welfare consideration that appears to have received little attention throughout the consultation process.

The proposal would also impose a significant financial burden on responsible firearm owners.

Many straight pull firearms are premium European sporting firearms manufactured by companies such as Blaser and Mauser. Individual firearms commonly exceed \$10,000 in value and are often fitted with specialised optics and accessories purchased over many years. Any compulsory acquisition or buyback program would represent a substantial cost to Government while confiscating property from individuals who have complied with every legislative requirement imposed upon them.

If Government nevertheless proceeds with reclassification, the NWHOA submits that any compensation scheme must provide payment at not less than one and a half times current market value for the bare firearm. Compensation should also recognise associated equipment where its use is directly dependent upon the affected firearm.

Citizenship as the Default Eligibility Requirement for Firearms Licensing

The NWHOA opposes the proposal to make Australian citizenship the default eligibility requirement for obtaining a firearms licence.

The Association believes that eligibility to possess and use firearms should continue to be determined by whether an applicant is a **fit and proper person**, rather than by their citizenship status. This principle has formed the foundation of Tasmania's firearms licensing system for many years and has proven to be an effective method of assessing an individual's suitability to possess firearms.

Current licensing requirements already provide Tasmania Police with extensive powers to assess applicants before any licence is granted. Applicants are subject to criminal history checks, mental health considerations where appropriate, domestic violence history, firearm prohibition orders, character assessments, genuine reason requirements, safe storage inspections and ongoing monitoring throughout the life of the licence.

These safeguards are directed towards identifying individuals who may present a genuine risk to public safety. Citizenship, by comparison, is not an indicator of a person's character, responsibility, or likelihood of complying with firearms legislation.

The NWHOA is concerned that this proposal introduces an arbitrary barrier that excludes otherwise suitable people without demonstrating any corresponding improvement in community safety.

Many permanent residents have deliberately chosen not to seek Australian citizenship for personal, financial or family reasons. Others maintain citizenship of another country because of legal or cultural obligations while continuing to live permanently in Australia. None of these circumstances diminish their suitability to safely own firearms where they otherwise satisfy every licensing requirement imposed by law.

The NWHOA believes it is fundamentally unfair that an individual who has lived responsibly in Tasmania for many years, complied with all Australian laws, and successfully passed every background assessment could be deemed unsuitable solely because they have not become an Australian citizen.

No evidence has been presented during the consultation process demonstrating that permanent residents who currently hold firearms licences represent a greater public safety risk than Australian citizens holding the same licences. Without such evidence, the proposal appears to replace an objective risk assessment with a broad administrative requirement that does little to improve community safety.

Similarly, recreational hunting forms an important part of regional Tasmania's economy. Licensed hunters purchase accommodation, fuel, food, camping equipment, ammunition, firearms, clothing, four-wheel drive equipment and numerous other goods and services within rural communities. Restricting participation by otherwise suitable permanent residents may have unintended economic consequences for regional businesses that depend upon this activity.

The **fit and proper person** test focuses directly on the factors that matter most to public safety, namely an individual's conduct, criminal history, mental suitability, compliance with firearms laws, and genuine reason for ownership. Replacing that principle with citizenship as the primary eligibility requirement risks excluding responsible members of the community while doing little to prevent criminal access to firearms.

Storage, Notification Requirements and the National Firearms Register

The NWHOA has significant concerns regarding the proposed amendments requiring firearm owners to notify Tasmania Police whenever firearms are stored at a location other than their residential address for more than 24 hours, together with the broader implementation of the National Firearms Register.

While the NWHOA supports the objective of maintaining accurate records of lawfully owned firearms, we do not believe the proposed notification requirements are practical, proportionate or likely to improve public safety.

The consultation material states that the purpose of these amendments is to support the implementation of the National Firearms Register and improve the traceability of firearms. While accurate record keeping is an important component of firearms regulation, the proposed system appears to impose substantial additional administrative obligations on lawful licence holders without demonstrating how those obligations will reduce criminal offending.

The overwhelming majority of Tasmania's licensed firearm owners are responsible individuals who already comply with stringent licensing, storage and registration requirements. They notify changes of address, maintain approved storage, renew their licences, register their firearms and cooperate with police inspections when required. These individuals are not the source of illegally possessed firearms.

The Association is concerned that the proposed amendments place increasing emphasis on monitoring the routine movements of lawfully owned firearms rather than addressing the criminal acquisition and misuse of firearms.

For many Tasmanians, particularly those living in rural and regional areas, firearms are routinely transported between multiple locations for legitimate purposes, including travel between principal residences, farming properties, hunting camps, shacks, holiday homes or family properties throughout the year. It is common for firearms to remain safely and securely stored at one of these locations whilst their owner returns home or travels elsewhere.

Under the proposed amendment, a person who securely stores firearms at a hunting shack for more than 24 hours may be required to notify Tasmania Police on every occasion. For many members this would occur numerous times throughout the year, with the high possibility of every weekend, particularly during

the winter wallaby hunting season. Farmers may regularly move firearms between multiple rural properties depending on seasonal work, pest animal activity or livestock management. Professional pest controllers may operate across several districts within a single week, and recreational hunters often undertake extended hunting trips throughout Tasmania and interstate.

These are ordinary activities undertaken by responsible licence holders.

Requiring notification each time firearms remain at one of these locations for more than 24 hours would create an unnecessary administrative burden for both firearm owners and for the Tasmania Police. The NWHOA questions whether the significant resources required of TasPol to process, record and maintain this information would produce any measurable improvement in public safety - it is likely that the volume of notifications generated by thousands of compliant firearm owners would substantially increase administrative workload without identifying any criminal activity.

The NWHOA also has concerns regarding the proposal requiring notification before changing residential address.

Moving house is often one of the busiest and most stressful periods in a person's life. Individuals relocating for employment, family reasons or financial circumstances are required to organise removalists, utilities, banking, insurance, schools, telecommunications and numerous other essential services. This is particularly more stressful and time-consuming when moving interstate - involving securing accommodation, establishing TasWater and Hydro Tasmania accounts, changing driver's licences, enrolling children in new schools, arranging employment and completing many other administrative requirements.

Requiring notification 24 hours before changing address within the state may be unrealistic in many circumstances, particularly where moves occur unexpectedly because of rental availability, employment opportunities or family emergencies. The existing requirement to notify Tasmania Police as soon as reasonable after relocation has proven workable and should be retained. Reducing the application period for those who move to Tasmania from interstate (when they have a valid firearms licence from that state) from 3 months to 7 days is a absurdly short amount of time.

Another significant concern relates to privacy and cybersecurity.

The National Firearms Register proposes to hold increasingly detailed information relating to firearm ownership, storage and movement.

Australia has experienced numerous high-profile cyber incidents affecting both government agencies and major private organisations in recent years. Data breaches involving Optus, Medibank, MediSecure and numerous government systems demonstrate that no database can be considered immune from sophisticated cyber attacks. A database containing detailed information about firearm ownership, storage locations and movement would be an attractive target for organised criminal groups.

Should such information be compromised, the consequences could be significant.

Criminals could potentially identify households containing firearms, determine when firearms are likely to be stored away from the owner's residence or identify properties that may be temporarily unoccupied while owners are travelling or hunting. Rather than improving public safety, such information could inadvertently increase security risks for lawful firearm owners and their families.

The NWFA believes the Tasmanian Government has an obligation to clearly explain how this information will be protected before requiring licence holders to provide increasing amounts of personal information.

Firearms legislation should focus on identifying and disrupting criminal activity, not monitoring the routine movements of lawfully owned firearms being used responsibly by licensed Tasmanians.

Magazine Capacity Limits for Category A and B Firearms

The NWHOA strongly opposes the proposed introduction of magazine capacity limits for certain Category A and B firearms.

The NWHOA acknowledges that public safety is the primary objective of firearms legislation. However, legislative restrictions should only be introduced where there is clear evidence that they will achieve a measurable improvement in community safety. In the absence of such evidence, additional restrictions simply increase the regulatory burden on responsible firearms owners without addressing the underlying causes of firearm-related crime.

The consultation material proposes limiting magazine capacities for certain manually operated Category A and B firearms. These firearms have been lawfully owned and used throughout Tasmania for many years for hunting, pest animal management, recreational shooting and competitive shooting disciplines.

There has been no evidence demonstrating that the lawful possession of these firearms, or their existing magazine capacities, has contributed to increased criminal offending or public safety risks within Tasmania. Without evidence linking lawful magazine capacity to criminal misuse, the proposal appears to be a unfair precautionary measure rather than a response to an identified problem.

Good legislation should be based upon demonstrated need rather than hypothetical risk.

The NWHOA is particularly concerned that the proposal does not adequately distinguish between firearms lawfully possessed by licensed owners, and firearms taken illegally and used by criminals. Individuals who acquire firearms illegally are unlikely to comply with magazine capacity restrictions any more than they comply with existing firearms legislation. Criminals do not obtain firearms through lawful licensing systems. They do not register firearms, undertake background checks, install compliant storage or notify police of changes in circumstances. As a result, magazine restrictions imposed upon licensed firearm owners are unlikely to influence criminal behaviour.

Instead, the practical effect of the amendment will be felt almost exclusively by people who have already demonstrated their willingness to comply with the law.

The NWHOA is also concerned about the impact these restrictions may have on humane hunting practices (as discussed in the section above in regards to the re-classification of Straight Pull and Button or Lever Release Firearms.)

One of the fundamental responsibilities of every ethical hunter is to ensure that animals are dispatched as quickly and humanely as possible. Although careful shot placement is always the primary objective, experienced hunters understand that circumstances can arise where immediate follow-up shots are required. Animals may move unexpectedly, environmental conditions may affect shot placement, or wounded animals may require rapid euthanasia to prevent unnecessary suffering. Magazine capacity does not encourage irresponsible shooting, rather, it provides hunters with the ability to safely and humanely respond when follow-up shots are genuinely required.

This is particularly relevant during organised pest animal control programs where multiple feral animals may be encountered simultaneously. Wallaby, kangaroo, deer, goats and pigs frequently move in herds. Where landholders have authorised pest control activities, the ability to safely undertake effective follow-up shots contributes to more efficient population management and reduces prolonged animal suffering.

Reducing magazine capacity may therefore have unintended consequences for both animal welfare and effective pest management.

The NWHOA also notes that many competitive shooting disciplines utilise firearms that would be affected by the proposed restrictions.

Competitive shooting is a recognised and legitimate sporting activity conducted under strict safety rules. Participants already comply with extensive licensing requirements, range safety procedures and competition regulations. No evidence has been presented suggesting that participants in these disciplines present an increased public safety risk because of existing magazine capacities. Restricting equipment

used in legitimate sporting activities risks reducing participation without delivering corresponding public safety benefits.

The proposal may also impose unnecessary financial costs upon lawful firearm owners.

Many licence holders have invested considerable sums purchasing magazines or repeater firearms that are currently lawful under Tasmanian legislation. Introducing new capacity limits may require owners to replace equipment that has been legally acquired and responsibly used for many years. Where legislative changes require individuals to surrender lawfully owned property, the Tasmanian Government should clearly demonstrate why those changes are necessary and what public benefit they are.

The NWHOA believes that legislation should be evidence based, proportionate and directed towards identifiable risks. At present, the proposed magazine restrictions do not appear to satisfy those principles.

Lending of Firearms, Verification Requirements & Expanded Inspection Powers

The NWHOA supports responsible lending of firearms between appropriately licensed individuals and agrees that accountability should remain with the person borrowing the firearm. We also support measures that prevent uncontrolled on-lending where responsibility for a firearm becomes unclear.

However, we do not support the proposed verification requirements associated with the National Firearms Register.

For many years, licensed firearm owners have responsibly lent firearms to family members, friends, neighbours and hunting companions who hold the appropriate licence category. This occurs for legitimate reasons, including hunting trips, pest animal control, firearm repairs and introducing new licence holders to the sport. There is little evidence to suggest that these arrangements have created a significant public safety issue in Tasmania.

The NWHOA believes the proposed verification process introduces unnecessary bureaucracy without improving accountability. A far simpler approach would be to require both parties to hold a current licence for the relevant firearm category, with a simple written declaration if additional documentation is considered necessary. This would provide accountability while avoiding unnecessary administrative burden for both firearm owners and Tasmania Police.

The proposed amendments also fail to address the underlying uncertainty surrounding the lawful lending of firearms. Rather than relying on policy guidelines to distinguish lawful lending from unlawful trafficking, the Firearms Act should clearly state that temporary lending between appropriately licensed persons does not constitute firearms trafficking. This would provide greater certainty for both licence holders and law enforcement.

The NWHOA also has concerns regarding the proposal requiring any person in possession of a firearm to produce it for inspection.

In many households, only one licence holder is responsible for firearm storage and retains sole access to safe keys or combinations. Other licensed family members may lawfully use a firearm but not have access to the storage facility, while unlicensed household members are intentionally prevented from accessing firearms. The legislation should recognise these practical arrangements and ensure legal responsibilities remain clear and reasonable.

Tasmania Police already possess extensive powers to investigate suspected firearms offences, including search and seizure powers where appropriate. No evidence has been presented demonstrating that expanding inspection powers beyond the registered owner will improve public safety or increase the detection of criminal offending.

The NWHOA therefore recommends that the proposed lending provisions be simplified, that lawful lending between licensed firearm owners be clearly distinguished from criminal firearms trafficking within the legislation, and that any expansion of inspection powers be supported by clear evidence demonstrating a genuine operational need.

Stronger Penalties for Firearm Theft and Possession of Stolen Firearms

The NWHOA strongly supports the proposed amendments that increase penalties for firearm theft and the possession of stolen firearms.

Unlike many of the other amendments contained within the Bill, these proposals directly target criminal behaviour rather than imposing additional restrictions on responsible firearms owners. Firearms that are stolen from lawful owners are one of the primary ways firearms enter the illegal market. Measures that deter theft, increase penalties for offenders and improve the recovery of stolen firearms have the potential to make a genuine contribution to public safety.

Responsible firearms owners have consistently supported stronger action against those who steal firearms or knowingly possess stolen firearms. The NWHOA supports the introduction of mandatory minimum penalties where there is clear evidence that an offender has knowingly stolen or possessed a stolen firearm. However, mandatory sentencing should only apply where the prosecution can establish beyond reasonable doubt that the individual knew, or reasonably ought to have known, that the firearm was stolen.

It is important that the legislation continues to distinguish between deliberate criminal conduct and situations where an individual may unknowingly come into possession of a firearm or firearm part with an unknown history. Appropriate discretion should remain available where the circumstances do not support a finding of intentional criminal behaviour.

The NWHOA also believes greater emphasis should be placed on preventing firearm theft before it occurs. Continued education regarding secure storage, targeted policing of organised criminal groups, intelligence-led investigations and strong prosecution of offenders will do more to reduce the illegal firearms market than additional restrictions on compliant licence holders.

Recognising the Contribution of Licensed Firearms Owners and Hunters

Throughout the consultation material, there is little acknowledgement of the positive contribution that licensed firearms owners make to Tasmania. The North West Hound Owners Association (Devonport Branch) believes this is a significant omission and encourages the Tasmanian Government to recognise the important role that responsible firearm owners play in protecting agricultural productivity, supporting regional communities, promoting animal welfare and contributing to Tasmania's economy.

The overwhelming majority of Tasmania's firearms licence holders are responsible, law-abiding people who have demonstrated that they are fit and proper persons. They have undergone extensive background checks, comply with strict storage requirements, register their firearms, renew their licences and understand the significant responsibilities that accompany firearm ownership.

These individuals are not the source of criminal firearm offending.

Rather than viewing licensed firearm owners primarily through the lens of regulation and compliance, future firearms legislation should recognise them as important contributors to public safety and land management.

One of the most significant contributions made by licensed hunters is the control of pest and invasive species. Across Tasmania, hunters assist landholders in managing populations of deer, rabbits, feral cats and other pest species that cause significant damage to agricultural land. In many areas, private landholders rely on experienced hunters to help manage these populations where commercial or government control programs are either unavailable or financially impractical.

Hunting also provides an important source of sustainable, wild-harvested food for many Tasmanian families.

Wild game harvested from healthy populations provides high-quality protein that is ethically sourced and utilised responsibly. Many licence holders harvest deer, wallaby and other game species specifically for household consumption, reducing food waste while contributing to sustainable wildlife management.

This aspect of hunting is rarely acknowledged in public discussions surrounding firearms legislation despite its environmental and social benefits.

The economic contribution made by hunting and recreational shooting should also be recognised.

Each year, licensed hunters spend considerable amounts within regional Tasmania on accommodation, fuel, groceries, restaurants, vehicle servicing, camping equipment, firearms, ammunition, clothing, optics, veterinary services for working dogs and much more. These expenditures support small businesses and local employment in many regional communities. Interstate and international visitors who travel to Tasmania for hunting and shooting activities similarly contribute to local tourism and regional economy.

The "Economic Contribution of Recreational Hunting and Shooting to the Tasmanian Economy" A Report for the Department of Natural Resources and Environment Tasmania dated 3 November 2023 states "the total economic contribution of recreational hunting and sports shooting in Tasmania for 2022 was estimated to be \$88.4 million in GSP and 676 full time equivalent jobs."

The NWHOA also believes that responsible hunting organisations play an important role in promoting safe firearm use. Clubs and Associations provide opportunities for education, mentoring and the sharing of safe hunting practices. Experienced members assist new licence holders in understanding their legal responsibilities, ethical hunting standards, safe firearm handling and respectful relationships with landowners and the wider community.

The NWHOA encourages Government to continue engaging directly with representative organisations when considering future reforms. Those who lawfully use firearms every day possess practical knowledge regarding hunting, farming, pest animal control and firearm safety that can assist the Tasmanian Government in developing legislation that is both effective and workable. Meaningful consultation should involve genuine consideration of that experience before legislative changes are finalised.

Licensed firearm owners are not simply people who comply with the law. They are volunteers, farmers, primary producers, conservationists, pest controllers, sporting shooters, working dog owners, business operators and members of regional communities. Their experience and contribution should be recognised as an asset to Tasmania, and future firearms legislation should reflect that contribution through practical, evidence-based regulation that targets criminal behaviour rather than unnecessarily restricting those who have consistently demonstrated their commitment to responsible firearm ownership.

A Better Way Forward

The NWHOA believes Tasmania can continue to maintain one of Australia's strongest firearms licensing systems without placing unnecessary burdens on responsible licence holders. A commonsense approach.

We encourage the Government to focus future reforms on measures that genuinely improve public safety by targeting criminal offending, preventing firearm theft and supporting effective law enforcement. At the same time, legislation should remain practical, evidence based and proportionate while recognising the valuable contribution licensed hunters, sporting shooters and primary producers make to Tasmania's communities, economy and environment and traditional culture.

Thank you for your time and consideration of this submission. Please don't hesitate to contact me for any further clarification on the subject.

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