



Submission on the Firearms Amendment (Miscellaneous) Bill 2026

Submitted by:

Shooting Hunting Outdoors Tasmania (SHOT)

Submitted to:

Department of Police, Fire and Emergency Management
Tasmania

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Executive Summary

Shooting Hunting Outdoors Tasmania (SHOT) welcomes the opportunity to provide this submission regarding the proposed **Firearms Amendment (Miscellaneous) Bill 2026**.

SHOT is a coalition of organisations representing Tasmania's hunting, recreational shooting, clay target shooting, pest management, primary production and broader outdoor communities. Collectively, our member organisations represent many thousands of Tasmanians who lawfully own and use firearms for legitimate purposes and who have a demonstrated history of complying with one of Australia's most comprehensive firearms licensing systems.

SHOT recognises that firearms ownership carries significant responsibilities and supports legislation that contributes to genuine improvements in public safety. Our members have consistently supported initiatives that strengthen firearm security, improve tracing capabilities, enhance intelligence sharing between jurisdictions and increase penalties for those who steal, traffic or unlawfully possess firearms.

For this reason, SHOT supports a number of the administrative reforms proposed within the Bill, particularly those intended to facilitate implementation of the National Firearms Register (NFR), modernise dealer record keeping, clarify legislative terminology and improve the investigation and prosecution of serious firearm crime.

However, the Bill also contains several significant policy changes that extend beyond administrative reform. These include the proposed reclassification of certain firearms,

citizenship-based licensing restrictions, additional notification obligations, magazine capacity restrictions and mandatory reporting requirements.

These proposals directly affect thousands of responsible firearm owners throughout Tasmania. In SHOT's view, reforms of this magnitude should only proceed where they are supported by clear, objective evidence demonstrating that they are likely to achieve measurable improvements in public safety.

The consultation material released with the Bill explains what the Government proposes to do, but in many instances it does not explain why a particular proposal is necessary, what evidence supports it, or how success will be measured following implementation.

Good public policy requires more than identifying a perceived risk. It requires a demonstrated connection between the proposed legislative response and the public safety outcome that the Government seeks to achieve.

Throughout this submission SHOT therefore assesses each proposal against four fundamental questions:

1. What specific public safety problem is the amendment intended to address?
2. What evidence demonstrates that the problem exists in Tasmania?
3. How will the proposed amendment reduce that problem?
4. Are there less restrictive alternatives capable of achieving the same objective?

Where those questions cannot be answered from the consultation material or supporting documentation, SHOT recommends that further evidence be published before Parliament is asked to enact permanent legislative change.

SHOT's overarching position is that Tasmania's firearms legislation should continue to be:

- evidence-based;
- proportionate;
- practically enforceable;
- nationally consistent where beneficial;
- focused primarily upon criminal misuse rather than lawful ownership.

The firearms licensing system should continue to distinguish clearly between those who comply with the law and those who deliberately ignore it.

General Observations

Firearms Regulation Must Be Evidence-Based

Firearms regulation occupies a unique position within Australian law.

Unlike many other licensing systems, firearms legislation regulates property that is capable of causing serious harm if misused. For that reason, SHOT accepts that governments are justified in imposing rigorous licensing, registration, storage and training requirements.

However, the seriousness of firearms regulation also means that legislative reform should be based upon objective evidence rather than assumptions or perceptions.

The introduction of additional restrictions upon law-abiding licence holders should be supported by data demonstrating that those restrictions are likely to reduce criminal offending, accidental injury or unlawful access to firearms.

This principle is consistent with modern principles of good regulatory practice adopted by Australian governments.

Regulation should be:

- necessary;
- proportionate;
- targeted;
- evidence-based;
- capable of practical enforcement.

Where evidence is unavailable or inconclusive, governments should proceed cautiously before introducing measures that impose substantial costs upon compliant citizens.

Distinguishing Between Criminal Misuse and Lawful Ownership

A recurring theme throughout the Bill is that several proposals primarily affect individuals who already comply with Tasmania's licensing framework.

Tasmania's firearms licensing system already requires applicants to demonstrate that they are fit and proper persons, complete approved firearms safety training, establish a genuine reason for firearm ownership, comply with strict storage requirements and remain subject to ongoing suitability assessments.

The overwhelming majority of licence holders comply with these requirements throughout the life of their licence.

By contrast, individuals involved in organised crime, illicit firearms trafficking and violent offending generally operate outside the lawful licensing system entirely.

They obtain firearms through criminal means, including theft, illegal importation, illicit manufacture and black-market transactions.

Accordingly, SHOT considers that the greatest improvements in public safety will continue to arise from measures directed towards disrupting criminal supply chains rather than imposing additional regulatory obligations upon individuals who have already demonstrated long-term compliance with the law.

This distinction is fundamental to assessing the proportionality of every amendment contained within the Bill.

The Consultation Material

SHOT acknowledges the effort undertaken by the Department in releasing both a Consultation Information Sheet and an accompanying Questions and Answers document.

Together these documents provide a useful overview of the proposed reforms.

However, there remains considerable variation in the level of detail provided for individual amendments.

Some proposals are explained in only one or two sentences, while others introduce entirely new offences carrying imprisonment without extensive discussion of the policy rationale.

For example, the Questions and Answers document provides additional information regarding proposed offences relating to firearm lending, verification obligations and mandatory minimum sentencing that is not fully described in the consultation summary.

Where offences carrying imprisonment are proposed, SHOT considers that detailed explanation of their intended operation assists meaningful public consultation.

Future consultation processes would be strengthened by publication of:

- a detailed Explanatory Memorandum;
- a Regulatory Impact Statement;
- supporting statistical analysis;

- any operational advice relied upon by Government.

Providing this material before legislation is introduced enables stakeholders to offer informed feedback and assists Parliament in assessing whether proposed reforms are proportionate.

The Need for a Regulatory Impact Statement

One of SHOT's principal concerns is the apparent absence of a publicly available Regulatory Impact Statement (RIS).

A RIS is not simply an administrative document. It provides decision-makers and the public with an objective assessment of:

- the problem being addressed;
- the options considered;
- expected costs and benefits;
- implementation impacts;
- unintended consequences.

Several proposals within this Bill are likely to impose significant financial and administrative costs upon:

- licensed firearm owners;
- firearm dealers;
- sporting organisations;
- agricultural businesses;
- Tasmania Police.

Without a publicly available assessment of those costs and benefits, stakeholders are unable to determine whether less restrictive alternatives were considered.

SHOT respectfully recommends that significant reforms of this nature be accompanied by a publicly available Regulatory Impact Statement before final legislative consideration.

Maintaining Community Confidence

Tasmania has historically maintained comparatively high levels of cooperation between government, law enforcement and the lawful firearms community.

This cooperative relationship has contributed to strong compliance rates and a culture in which responsible firearm ownership is regarded as both a privilege and a responsibility.

Maintaining that relationship requires ongoing trust.

That trust is strengthened where legislative reform is transparent, evidence-based and developed in genuine consultation with affected stakeholders.

Conversely, where reforms are perceived as lacking evidence or disproportionately affecting compliant licence holders, confidence in the regulatory system may be diminished.

SHOT encourages the Government to continue engaging constructively with representative organisations throughout the development of future firearms policy.

Such engagement is likely to produce legislation that is both more effective and more broadly supported by the Tasmanian community.

The National Firearms Register – Opportunities, Risks and Recommendations

Introduction

Shooting Hunting Outdoors Tasmania (SHOT) supports the implementation of a National Firearms Register (NFR) that improves the ability of Australian law enforcement agencies to trace firearms, share intelligence across jurisdictions and maintain accurate records of lawful firearm ownership.

The Consultation Information Sheet explains that the National Firearms Register was endorsed by National Cabinet following concerns regarding information sharing between jurisdictions, including issues identified after the December 2022 Wieambilla murders. It further explains that the Register is intended to provide near real-time access to information concerning firearms, licences, permits and related records across Australia.

SHOT agrees that improving interoperability between jurisdictions is a worthwhile objective.

Modern policing increasingly relies upon timely access to reliable intelligence. Criminal activity does not recognise State borders, and neither should information systems relied upon by law enforcement agencies. If properly designed, adequately resourced

and securely managed, the National Firearms Register has the potential to improve both investigative capability and officer safety.

However, implementation of a national database should not be viewed as an end in itself. The effectiveness of any intelligence system depends upon the quality of the information entered into it, the safeguards protecting that information, and the practical manner in which it is used.

For these reasons SHOT supports the National Firearms Register in principle while recommending a number of safeguards to maximise its effectiveness and maintain public confidence.

The Purpose of the National Firearms Register

According to the Consultation Information Sheet, the National Firearms Register is intended to provide a single national record covering the lifecycle of every registered firearm—from manufacture or importation through to transfer, surrender, destruction or export.

SHOT considers these objectives to be both sensible and achievable.

The Register has the potential to:

- improve interstate intelligence sharing;
- reduce duplication between jurisdictions;
- assist investigations involving stolen firearms;
- improve identification of prohibited persons;
- support compliance auditing;
- reduce delays associated with interstate licence enquiries;
- provide police with more complete operational intelligence.

Many of these benefits have long been supported by responsible firearm organisations.

Lawful firearm owners benefit when stolen firearms are recovered quickly, criminal trafficking is disrupted and police have accurate information when conducting investigations.

The Importance of Accurate Data

A national register will only ever be as reliable as the information entered into it.

This principle is fundamental.

If inaccurate or incomplete information is uploaded, those errors will be replicated nationally.

Examples may include:

- incorrect serial numbers;
- duplicate firearm registrations;
- incorrect firearm classifications;
- delayed dealer notifications;
- outdated ownership records;
- inaccurate licence status.

Although individual administrative errors may appear minor, collectively they have the potential to undermine confidence in the entire system.

For this reason, SHOT considers that data quality should be regarded as equally important as legislative reform.

Data Integrity Before Expansion

The proposed amendments introduce a number of additional reporting obligations intended to support implementation of the National Firearms Register.

Examples include:

- temporary storage notifications;
- lending verification requirements;
- advance notification of address changes;
- advance notification of changes to personal particulars.

Before imposing these additional reporting obligations, SHOT recommends that Tasmania Police undertake a comprehensive audit of existing registry data to ensure the current database is accurate.

There is limited value in collecting additional information if historical records remain incomplete or inconsistent.

SHOT recommends that implementation occur in three stages:

Stage One

Audit existing registry information.

Stage Two

Correct identified discrepancies.

Stage Three

Introduce additional reporting requirements only where evidence demonstrates operational benefit.

This staged approach would improve confidence in the National Firearms Register while reducing unnecessary administrative burden.

National Consistency

One of the principal objectives of the Register is achieving nationally consistent information sharing.

SHOT supports this objective.

Australia's firearms laws differ between jurisdictions in areas including:

- licence categories;
- terminology;
- permit requirements;
- dealer reporting;
- firearm classifications.

These differences create practical difficulties when firearms are:

- transferred interstate;
- inherited;
- imported;
- exported;
- investigated.

Consistent recording standards will assist both police and legitimate firearm owners.

However, SHOT considers that consistency should apply primarily to information management rather than requiring every jurisdiction to adopt identical regulatory settings where local circumstances differ.

National consistency should improve efficiency without unnecessarily reducing the ability of States to respond to local conditions.

Police Officer Safety

One of the strongest arguments supporting the National Firearms Register is improved situational awareness for frontline police.

Where officers attend incidents involving known firearm owners, timely access to accurate information may assist operational planning and risk assessment.

However, information provided to operational officers must remain current.

Incorrect or outdated information may create unnecessary risks.

Accordingly, SHOT recommends that all information available through the Register be subject to regular validation and auditing.

Privacy and Information Security

The National Firearms Register will contain one of Australia's largest collections of information relating to lawful firearm ownership.

This information is likely to include:

- names;
- residential addresses;
- licence details;
- firearm serial numbers;
- firearm descriptions;
- storage locations;
- transfer histories;
- dealer information.

Such information would be highly valuable to organised criminal groups seeking to identify potential targets for firearm theft.

Accordingly, SHOT considers that cyber security must be treated as a core public safety issue rather than simply an information technology matter.

The consequences of unauthorised disclosure could include:

- targeted firearm theft;
- identity theft;
- officer safety concerns;
- reduced public confidence.

SHOT recommends that minimum cyber security standards be publicly established before implementation.

These should include:

- multi-factor authentication;
- encryption of stored and transmitted data;
- comprehensive audit logging;
- independent penetration testing;
- mandatory breach notification procedures;
- regular external security audits.

The protection of sensitive information should be regarded as essential to maintaining confidence in the National Firearms Register.

Administrative Burden

Several amendments contained within the Bill appear intended to increase the quantity of information available to the National Firearms Register.

While additional information may improve intelligence capability, it also increases administrative workload.

Every notification submitted by licence holders must ultimately be:

- received;
- processed;
- verified;
- entered into the registry;
- maintained.

SHOT is concerned that very large numbers of notifications concerning temporary firearm storage or short-term changes may generate significant administrative workload while providing relatively limited operational value.

Government should carefully consider whether each proposed reporting obligation delivers intelligence proportionate to the resources required to administer it.

Community Confidence

The success of the National Firearms Register will depend not only upon technology but also upon cooperation between government and the lawful firearms community.

Tasmania enjoys comparatively high levels of compliance among licensed firearm owners.

That compliance has developed through a licensing system that combines regulation with education and constructive engagement.

SHOT encourages the Government to continue that collaborative approach throughout implementation of the National Firearms Register.

Where new reporting requirements are introduced, adequate education, guidance material and transitional arrangements should accompany legislative change.

Compliance is most effectively achieved when obligations are clearly understood.

SHOT Recommendations

SHOT supports implementation of the National Firearms Register subject to the following recommendations:

Recommendation 1

The National Firearms Register should proceed as a nationally coordinated intelligence system that enhances police capability while respecting the rights and privacy of lawful firearm owners.

Recommendation 2

A comprehensive audit of existing firearms registry information should occur before introducing significant new reporting obligations.

Recommendation 3

Government should establish publicly available minimum cyber security and privacy standards applicable to the Register.

Recommendation 4

New reporting requirements should only be introduced where evidence demonstrates that the operational benefits outweigh the administrative burden.

Recommendation 5

Implementation should include comprehensive education for licence holders, firearm dealers and sporting organisations to support voluntary compliance.

Recommendation 6

The operation of the National Firearms Register should be independently reviewed within three years of commencement to assess:

- data quality;
 - operational effectiveness;
 - administrative costs;
 - privacy protections;
 - stakeholder impacts.
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Conclusion

SHOT supports the development of a National Firearms Register as an important national law enforcement initiative. A well-designed register has the potential to improve firearm tracing, intelligence sharing and officer safety while assisting in the prevention of illicit firearm trafficking.

At the same time, the Register's long-term success will depend upon the accuracy of its data, the security of the information it contains, and the confidence of those required to comply with its reporting requirements.

By placing equal emphasis on data integrity, cyber security, administrative efficiency and stakeholder engagement, Tasmania can contribute to a national system that strengthens public safety without imposing unnecessary burdens on responsible firearm owners.

Amendment 1 – Reclassification of Straight-Pull and Button/Lever Release Centre-Fire Rifles and Shotguns

Government Proposal

The Firearms Amendment (Miscellaneous) Bill 2026 proposes to reclassify straight-pull and button/lever release centre-fire rifles and shotguns from their current licence categories into the more restrictive Category C licence category.

The Consultation Information Sheet states that this proposal forms part of the Tasmanian Government's response following the Bondi incident and will require the establishment of a firearm buyback scheme. It further notes that the buyback arrangements are the subject of discussions with the Australian Government regarding funding.

The Questions and Answers document provides additional clarification regarding the implementation of this proposal and the intended buyback arrangements, but does not include statistical evidence demonstrating the prevalence of criminal offending involving these firearm types in Tasmania.

SHOT Position

SHOT does not support the proposed reclassification.

SHOT's opposition is not based upon resistance to firearms regulation. Tasmania has long maintained a robust licensing framework and responsible firearm owners have consistently demonstrated a willingness to comply with legislative requirements that are evidence-based, proportionate and directed towards improving public safety.

Rather, SHOT's concern is that the consultation material does not establish a clear evidentiary basis for reclassifying these firearms.

Legislation of this significance should be supported by objective evidence demonstrating:

- the nature of the identified public safety risk;
- why existing controls are insufficient;
- how the proposed reclassification will reduce that risk; and
- why less restrictive alternatives were not considered appropriate.

The consultation documents do not presently provide that analysis.

The Existing Licensing Framework

Before considering whether reclassification is justified, it is important to recognise that these firearms are already subject to extensive regulation.

Individuals lawfully possessing these firearms have already been required to:

- obtain a Tasmanian firearms licence;
- satisfy the "fit and proper person" test;

- demonstrate a genuine reason for ownership;
- complete approved firearms safety training;
- comply with secure storage requirements;
- register each firearm individually;
- remain subject to ongoing suitability assessments.

Accordingly, these firearms are not available for unrestricted purchase.

They are already possessed only by persons who have satisfied multiple legislative safeguards designed to minimise public risk.

Any proposal to further restrict ownership should therefore demonstrate why those existing safeguards are considered inadequate.

Understanding the Firearms Concerned

The consultation documents refer to straight-pull and button/lever release centre-fire rifles and shotguns.

Although different in mechanical design, these firearms remain manually operated firearms.

Unlike conventional self-loading (semi-automatic) firearms, each discharge requires a separate manual action before another cartridge can be fired.

The consultation documents themselves do not contain a technical explanation of these operating mechanisms. As a consequence, stakeholders are asked to comment upon a significant policy proposal without a detailed explanation of the practical characteristics that distinguish these firearms from others already lawfully owned under Category A or Category B licensing.

SHOT considers that public consultation is assisted when proposed reforms are accompanied by sufficient technical information to allow informed discussion.

Evidence-Based Regulation

One of the central principles of effective public policy is that restrictions should correspond to demonstrated risk.

The Consultation Information Sheet explains that the proposal follows the Bondi tragedy and forms part of broader community safety measures.

However, the consultation material does not identify:

- the number of offences committed in Tasmania using straight-pull or button/lever release firearms;
- whether these firearms are disproportionately represented in criminal offending;
- whether existing Category A or B licensing controls have proven ineffective;
- whether Tasmania Police requested reclassification on operational grounds;
- any published risk assessment comparing these firearms with other manually operated firearms.

Without this information, it is difficult for stakeholders to evaluate whether reclassification represents the most appropriate regulatory response.

SHOT respectfully submits that legislative reform should be guided by objective evidence rather than assumptions regarding the appearance or perceived capability of particular firearm designs.

Criminal Access to Firearms

Throughout Australia, governments have consistently recognised that organised criminal groups primarily obtain firearms through unlawful means rather than through the lawful licensing system.

These sources include:

- theft from lawful owners;
- illicit trafficking;
- illegal importation;
- unlawful manufacture;
- conversion of firearms;
- black-market transactions.

Responsible firearm owners neither participate in nor facilitate these activities.

Consequently, SHOT questions whether reclassification of firearms already held by vetted licence holders will materially reduce criminal access to firearms.

If the policy objective is to reduce criminal misuse, resources may be more effectively directed towards:

- preventing firearm theft;
- disrupting organised trafficking networks;
- strengthening border enforcement;
- improving intelligence capability;
- increasing penalties for firearm-related crime.

Several of these initiatives are also proposed elsewhere within the Bill and receive SHOT's support.

Proportionality

An important principle of legislative design is proportionality.

Restrictions imposed by law should be proportionate to the risk they seek to address.

Where a proposal substantially limits existing rights or lawful activities, the supporting evidence should be correspondingly strong.

The proposed reclassification would affect individuals who lawfully acquired their firearms under the legislation in force at the time of purchase and who have continued to comply with all licensing requirements.

Many have owned these firearms responsibly for many years without incident.

In these circumstances SHOT considers Parliament should require compelling evidence before retrospectively changing the legal status of those firearms.

Economic Impact

The consultation documents acknowledge that implementation of the proposal will require a firearm buyback.

This acknowledgement recognises that many affected firearms were lawfully acquired at significant personal expense.

The economic impact extends well beyond the value of the firearm itself.

Owners have frequently invested in:

- approved firearm safes;
- optics and sighting equipment;
- slings;
- bipods;
- magazines;
- cleaning equipment;
- replacement stocks;
- gunsmithing;
- competition equipment.

Firearm dealers may also hold inventory affected by reclassification.

Sporting organisations may experience reduced participation if members lose access to equipment used in recognised disciplines.

Primary producers may require replacement firearms to continue undertaking lawful pest animal management.

These wider economic consequences should be assessed as part of any Regulatory Impact Statement.

Compensation Principles

SHOT acknowledges that the Government has indicated a buyback scheme will accompany the proposed reclassification.

If Parliament ultimately proceeds with reclassification, SHOT submits that the compensation scheme should reflect several fundamental principles.

Fairness

Individuals acquired these firearms lawfully under legislation enacted by Parliament.

Owners acted in good faith and should not suffer financial disadvantage because Government subsequently changes policy.

Market Value

Compensation should reflect fair current market value immediately prior to the legislative announcement.

Administrative valuations based upon depreciated historical purchase prices would not adequately compensate affected owners.

Associated Equipment

Consideration should also be given to equipment rendered unusable solely because of reclassification, including firearm-specific components where they cannot reasonably be used with replacement firearms.

Dealers

Licensed firearms dealers holding affected inventory should also receive appropriate compensation to avoid significant commercial losses arising directly from legislative change.

Timely Payments

Compensation should be paid promptly following surrender to minimise financial hardship.

Transitional Arrangements

SHOT also recommends that, should Parliament proceed with reclassification, comprehensive transitional arrangements be legislated.

These should include:

- adequate implementation time;
- publication of clear administrative guidelines;
- appeal mechanisms where firearm classifications are disputed;
- certainty regarding dealer obligations;
- practical arrangements for replacement licensing where required.

Effective transition planning will reduce confusion and improve compliance.

Public Confidence

One of Tasmania's greatest strengths has been the constructive relationship that exists between Tasmania Police and the lawful firearms community.

Responsible firearm owners generally accept regulation where it is transparent, practical and supported by evidence.

Conversely, retrospective restrictions imposed without a clearly articulated evidentiary basis risk undermining confidence in the regulatory framework.

Maintaining public confidence requires that significant reforms be accompanied by clear explanations of both the problem being addressed and the reasons why the proposed solution represents the most effective and proportionate response.

SHOT Recommendations

SHOT recommends that Amendment 1 **not proceed in its current form** until the Government publishes:

1. The evidence supporting reclassification;
2. The operational advice relied upon;
3. The anticipated public safety outcomes;
4. A Regulatory Impact Statement assessing costs and benefits.

If Parliament nevertheless proceeds, SHOT recommends that legislation provide:

- full market-value compensation;
- compensation for affected dealers;
- reasonable transitional arrangements;
- transparent classification guidelines;
- an independent review of the effectiveness of the reforms within five years of implementation.

Conclusion

SHOT supports evidence-based firearms regulation that improves public safety while maintaining fairness for responsible firearm owners.

The proposed reclassification represents one of the most significant changes contained within the Firearms Amendment (Miscellaneous) Bill 2026. As such, it should be accompanied by a comprehensive public explanation of the evidence supporting the proposal, the alternatives considered, and the anticipated benefits.

Until that material is made available, SHOT does not consider that the case for reclassification has been sufficiently established.

Amendment 2 – Australian Citizenship as the Default Eligibility Requirement for Firearms Licensing

Government Proposal

The Firearms Amendment (Miscellaneous) Bill 2026 proposes establishing Australian citizenship as the default eligibility requirement for obtaining a Tasmanian firearms licence.

The Consultation Information Sheet states that limited exemptions would be available for certain New Zealand citizens in defined circumstances, such as primary production, or where an exemption is granted by the Commissioner of Police.

The Questions and Answers document expands upon this proposal, explaining that existing non-citizen licence holders would generally not be affected, while future applicants who are not Australian citizens would need to rely upon one of the proposed exemptions. It also confirms that the Commissioner would have discretionary authority to approve exemptions in appropriate cases.

SHOT Position

SHOT does not support this amendment in its current form.

SHOT fully supports rigorous suitability assessments for all firearms licence applicants. Every applicant should continue to demonstrate that they are a fit and proper person, possess a genuine reason for firearm ownership, have successfully completed approved firearms safety training, and satisfy secure storage requirements.

However, SHOT does not consider Australian citizenship, by itself, to be an appropriate or evidence-based criterion upon which to determine an individual's suitability to lawfully possess firearms.

The proposed amendment represents a significant departure from the long-standing principle that firearms licensing should be based upon individual suitability rather than nationality.

The Existing Licensing System

Tasmania already operates a comprehensive licensing regime that enables Tasmania Police to thoroughly assess every applicant.

Current licensing requirements include consideration of:

- criminal history;
- family violence and domestic violence orders;
- mental health matters where relevant under the Act;
- demonstrated competency;
- genuine reason;
- secure storage;
- ongoing suitability.

Importantly, these assessments focus upon an applicant's behaviour, character and capacity to safely possess firearms.

SHOT considers these criteria to be the appropriate basis for licensing decisions because they directly relate to public safety.

Citizenship and Public Risk

The consultation material does not identify evidence demonstrating that permanent residents or other long-term lawful residents present a greater firearms risk than Australian citizens.

Similarly, neither the Consultation Information Sheet nor the Questions and Answers document provides statistical evidence showing that citizenship status has contributed to firearm-related offending in Tasmania.

Without such evidence, SHOT is concerned that citizenship becomes a proxy measure for risk rather than a demonstrated indicator of it.

Legislation should distinguish between characteristics that are administratively convenient and those that are genuinely relevant to public safety.

Permanent Residents in Tasmania

Tasmania has benefited for many years from skilled migration and permanent settlement by individuals who make significant contributions to regional communities.

Many permanent residents:

- own farming enterprises;
- work in agriculture;
- participate in sporting organisations;
- operate small businesses;
- volunteer within community organisations;
- intend to become Australian citizens but have not yet completed that process.

Many have lived in Tasmania for extended periods, paid taxes, raised families and established deep connections with their local communities.

Under the proposed amendment, some of these individuals may become ineligible to obtain a firearms licence despite otherwise satisfying every existing suitability requirement.

SHOT questions whether this outcome is proportionate.

Primary Production

The consultation documents acknowledge that exemptions are contemplated for some New Zealand citizens engaged in primary production.

SHOT welcomes recognition that agriculture presents unique operational requirements.

However, limiting exemptions to narrowly defined categories may not adequately reflect the diversity of Tasmania's agricultural sector.

Many agricultural businesses employ:

- permanent residents;
- skilled migrant workers;
- long-term visa holders;
- farm managers;
- contract pest controllers.

Firearms are frequently required for:

- humane destruction of injured livestock;
- pest animal management;
- protection of crops;
- protection of livestock.

Where those activities are undertaken lawfully and under appropriate supervision, SHOT considers that licensing decisions should continue to be based upon demonstrated competence and suitability rather than citizenship status.

Sporting Shooting

Tasmania's shooting sports attract participants from a wide variety of cultural and national backgrounds.

Permanent residents regularly participate in:

- clay target shooting;
- target rifle competitions;
- hunting activities;
- firearm safety training;
- club administration.

Many are active members of approved clubs and have established records of safe participation over many years.

The consultation material does not explain why these individuals should be treated differently from Australian citizens where their licensing history demonstrates equivalent compliance and suitability.

Administrative Discretion

The proposed amendment relies upon discretionary exemptions granted by the Commissioner of Police.

SHOT recognises that discretionary powers are an important feature of many administrative schemes.

However, where Parliament creates broad discretionary powers, consideration should also be given to:

- consistency of decision-making;
- transparency;
- review rights;
- published guidelines;
- procedural fairness.

Without clear legislative guidance, applicants may experience inconsistent outcomes depending upon individual circumstances or administrative interpretation.

The Importance of Objective Criteria

One of the strengths of Tasmania's existing licensing system is that it relies largely upon objective and measurable criteria.

Applicants either:

- satisfy competency requirements;
- meet storage requirements;
- establish a genuine reason;
- pass background checks; or
- do not.

Introducing citizenship as a threshold requirement changes the focus from demonstrated behaviour to legal status.

SHOT respectfully submits that public confidence is best maintained where licensing decisions continue to be based upon factors directly connected to safe firearm ownership.

Economic Considerations

Tasmania's economy relies heavily upon regional industries that experience ongoing labour shortages.

Skilled migration has become increasingly important within:

- agriculture;
- forestry;
- aquaculture;
- food production;
- engineering;
- regional manufacturing.

Where permanent residents perform duties requiring lawful firearm use, additional licensing barriers may create unintended workforce consequences.

The consultation material does not include any assessment of these potential impacts.

SHOT considers that these economic implications should form part of any Regulatory Impact Statement accompanying the legislation.

Human Rights and Administrative Fairness

SHOT acknowledges that Parliament has the authority to establish eligibility criteria for firearms licensing.

However, good administrative practice generally favours decision-making based upon relevant risk factors rather than broad personal characteristics.

Where two applicants present identical:

- criminal histories;
- competency;
- storage arrangements;
- genuine reasons;
- compliance histories,

but receive different outcomes solely because one has not yet completed the citizenship process, Parliament should carefully consider whether the distinction is supported by a demonstrable public safety benefit.

SHOT is not suggesting that citizenship can never be relevant to legislative policy.

Rather, SHOT submits that any distinction should be supported by evidence demonstrating why citizenship materially improves the effectiveness of the firearms licensing system.

Alternative Approach

Rather than introducing citizenship as a default legislative requirement, SHOT recommends strengthening the existing suitability framework where necessary.

Possible alternatives include:

- enhanced background checking for overseas applicants where appropriate;
- improved information sharing with interstate and Commonwealth agencies;
- greater use of existing fit and proper person assessments;
- ongoing compliance monitoring;
- strengthened cancellation provisions where risk emerges after licensing.

These measures remain directly connected to public safety and avoid excluding otherwise suitable applicants solely because of their citizenship status.

SHOT Recommendations

SHOT recommends that Amendment 2 be reconsidered.

Specifically, SHOT recommends that:

Recommendation 1

Eligibility for firearms licences should continue to be determined primarily by demonstrated suitability rather than citizenship.

Recommendation 2

If Parliament proceeds with the amendment, the legislation should clearly define:

- eligibility criteria;
- exemption categories;
- assessment principles;
- review rights;
- procedural safeguards.

Recommendation 3

The Commissioner of Police should publish administrative guidelines governing the exercise of exemption powers to promote consistency and transparency.

Recommendation 4

Government should publish evidence demonstrating why citizenship has been identified as a relevant public safety criterion before implementing this proposal.

Conclusion

SHOT supports a rigorous firearms licensing system founded upon public safety, individual responsibility and ongoing compliance.

The coalition does not oppose careful assessment of applicants. Indeed, SHOT considers Tasmania's existing licensing framework to be one of Australia's strongest.

However, the proposed citizenship requirement represents a significant policy change that has not, on the material released for consultation, been supported by evidence demonstrating that it will improve community safety.

SHOT therefore submits that licensing should continue to focus upon those factors most closely connected to safe firearm ownership: character, competence, lawful purpose, secure storage and continuing suitability.

Amendments 3 and 4 – Lending of Firearms and Verification Requirements

Introduction

Amendments 3 and 4 are closely related and should be considered together.

The proposed amendments seek to strengthen accountability for firearms that are temporarily transferred between licensed persons by:

- preventing the on-lending of firearms to a third party;
- introducing new obligations on persons lending firearms;
- requiring lenders to verify that borrowers hold a current firearms licence;
- requiring lenders to satisfy themselves that the borrower has lawful storage facilities.

The Government has indicated these amendments are intended to reduce the likelihood of firearms being lost, misplaced or diverted from lawful possession, while supporting implementation of the National Firearms Register.

The accompanying Questions and Answers document provides additional detail regarding the proposed offence provisions, including the creation of new lending offences and the meaning of the proposed verification requirements.

SHOT supports measures that improve accountability for firearms while recognising that lawful lending remains an important and longstanding feature of responsible firearms ownership in Tasmania.

Amendment 3

Restricting the On-Lending of Firearms

Government Proposal

The Bill proposes allowing a firearm owner to lend a firearm directly to another licensed individual while preventing that borrower from subsequently lending ("on-lending") the firearm to a third person.

The stated purpose is to reduce uncertainty regarding who has possession of a firearm and lessen the likelihood of firearms being lost or misplaced.

SHOT Position

SHOT supports this amendment in principle.

A firearm should always remain traceable to the person currently responsible for its possession.

Where firearms pass through multiple hands without the knowledge of the owner, uncertainty may arise regarding:

- who currently possesses the firearm;
- who is responsible for secure storage;
- who should report loss or theft;
- who is responsible if an offence occurs.

Limiting possession to the owner and the original borrower provides greater certainty.

Existing Practice

Temporary lending has long been recognised as a legitimate aspect of lawful firearms ownership.

Examples include:

- hunting with friends;
- clay target competitions;
- supervised coaching;
- firearm familiarisation;

- pest animal control on neighbouring properties;
- temporary replacement while another firearm is being repaired.

These activities are commonplace within the lawful firearms community and generally occur between trusted individuals who already hold firearms licences.

SHOT therefore agrees that responsibility should remain clearly identifiable throughout the lending period.

Accountability

From both a policing and public safety perspective, limiting on-lending creates a clear chain of accountability.

At any point in time there should be certainty regarding:

- the registered owner;
- the authorised borrower;
- the location of the firearm;
- the person responsible for secure storage.

This assists police investigations should a firearm subsequently be:

- reported stolen;
- located during an investigation;
- involved in an incident;
- recovered after being lost.

Practical Considerations

While SHOT supports the underlying principle, the legislation should recognise circumstances where temporary transfer occurs under organised supervision.

Examples include:

- accredited firearms safety courses;
- club coaching programmes;
- recognised competitions;
- dealer demonstrations;
- authorised armourers or gunsmiths.

These situations are already subject to oversight and should not inadvertently fall within the prohibition on on-lending.

Recommendation

SHOT supports Amendment 3, provided the legislation includes clearly defined exemptions for supervised sporting, training and commercial activities already regulated elsewhere under the Act.

Amendment 4

Verification Requirements When Lending Firearms

Government Proposal

The Bill proposes requiring any person lending a firearm to:

- verify that the borrower holds a valid firearms licence; and
- satisfy themselves that the borrower has lawful storage facilities.

To support implementation of these provisions, new statutory definitions including "lend", "borrow", "on-lend" and "verify" are proposed.

The Questions and Answers document further explains that failure to comply with these obligations may constitute a criminal offence under the proposed legislation.

SHOT Position

SHOT supports verification of licensing but has significant concerns regarding the practical operation of the proposed storage verification requirement.

There is an important distinction between verifying a firearms licence and verifying another person's storage arrangements.

One obligation is readily achievable.

The other presents significant practical difficulties.

Verifying a Firearms Licence

SHOT agrees that firearm owners should take reasonable steps to ensure that firearms are only lent to appropriately licensed individuals.

Responsible firearm owners already commonly request to see another person's licence before lending firearms.

Formalising this expectation within legislation is therefore unlikely to impose significant additional burden, provided an efficient verification mechanism is available.

Practical Difficulties in Verifying Storage

The proposed requirement to satisfy oneself that another person has lawful storage raises more complex issues.

Private individuals generally have:

- no statutory inspection powers;
- no access to Tasmania Police licensing records;
- no authority to certify another person's compliance.

In many cases a lender will have no practical means of confirming:

- whether a compliant safe exists;
- whether the safe meets legislative standards;
- whether it remains securely installed;
- whether storage arrangements have changed since the licence was issued.

The legislation should not impose criminal liability where compliance depends upon information that an ordinary person cannot reasonably obtain.

Reasonable Steps

SHOT recommends that the legislation adopt a "reasonable steps" approach.

Under this model a lender would satisfy their legal obligation where they have acted honestly and reasonably based upon the information available at the time.

Examples may include:

- inspecting a current firearms licence;

- receiving confirmation from the borrower regarding lawful storage;
- relying upon previous knowledge of the borrower's approved storage;
- using an approved electronic verification system.

This approach reflects established principles found throughout Australian regulatory law, where individuals are expected to take reasonable precautions rather than guarantee matters beyond their control.

Electronic Verification

If Parliament intends to impose legal verification obligations, Government should provide practical tools enabling compliance.

SHOT recommends development of a secure online verification portal allowing licence holders to confirm:

- licence validity;
- licence category;
- expiry date;
- suspension status.

Importantly, such a system should protect privacy by confirming only the information necessary to establish lawful lending.

It should not disclose unnecessary personal information.

Privacy Considerations

The Questions and Answers document contemplates verification obligations as part of implementation of the National Firearms Register.

SHOT supports appropriate information sharing where necessary for lawful transactions.

However, privacy protections should remain central to system design.

Verification systems should disclose only whether:

- a licence is current;
- the licence authorises possession of the relevant category of firearm.

Additional personal information should remain confidential.

Unintended Consequences

If drafted too broadly, the proposed offence provisions may discourage lawful lending altogether.

This could adversely affect:

- novice shooters receiving instruction;
- supervised coaching;
- organised competitions;
- regional clubs with limited equipment;
- younger participants entering the sport.

The legislation should therefore strike an appropriate balance between accountability and practicality.

Alternative Legislative Approach

SHOT recommends that the legislation provide a statutory defence where the lender:

1. inspected a current firearms licence;
2. reasonably believed the borrower possessed lawful storage; and
3. had no reasonable grounds to suspect otherwise.

Such a provision would encourage responsible behaviour while avoiding unfair criminal liability.

SHOT Recommendations

SHOT recommends that Amendment 4 be amended to provide that:

Recommendation 1

Verification obligations are satisfied where a lender has taken reasonable steps.

Recommendation 2

Government establish an official electronic licence verification system before commencement of the offence provisions.

Recommendation 3

The Act clearly define the extent of a lender's obligations regarding storage verification.

Recommendation 4

The legislation include a statutory defence where the lender has acted honestly, reasonably and in good faith.

Recommendation 5

Privacy protections be incorporated into any verification system associated with the National Firearms Register.

Conclusion

SHOT supports measures that improve accountability for temporarily transferred firearms.

The coalition agrees that firearms should only be lent to appropriately licensed persons and that unnecessary on-lending should be discouraged.

However, legislative obligations must remain practical.

Responsible firearm owners should be expected to take reasonable steps to verify compliance—not to guarantee matters that lie beyond their knowledge or control.

By adopting a reasonable-steps approach supported by modern electronic verification systems, Parliament can improve accountability without imposing unrealistic obligations on the lawful firearms community.

Amendments 5 and 6 – Updated Definitions and Clarification of "Firearm" and "Firearm Part"

Introduction

Although Amendments 5 and 6 appear administrative in nature, they have significant legal implications.

Definitions are the foundation of legislation. Every licensing decision, criminal prosecution, dealer transaction and regulatory power ultimately depends upon the meaning of the words used throughout the Act.

Poorly drafted definitions create uncertainty for:

- firearm owners;
- firearm dealers;
- police officers;
- prosecutors;
- defence practitioners;
- the Courts.

Conversely, precise definitions improve consistency, reduce litigation and strengthen public confidence in the administration of the Act.

For these reasons SHOT supports the objective of modernising and clarifying legislative terminology, provided that the amendments improve certainty rather than inadvertently expanding the scope of criminal liability.

Amendment 5

Updating Definitions for National Consistency

Government Proposal

The Bill proposes updating a number of statutory definitions to improve consistency with terminology adopted elsewhere in Australia.

Examples include replacing:

- "pistol" with "handgun"; and
- "firearm sound suppressor" with "suppressor".

The Consultation Information Sheet indicates these amendments are intended to support national consistency, particularly in preparation for the National Firearms Register.

SHOT Position

SHOT supports Amendment 5.

Consistent terminology across Australian jurisdictions offers significant practical benefits.

Modern policing, interstate firearm transfers and implementation of the National Firearms Register all depend upon common language.

Where different jurisdictions use different terminology to describe identical objects, unnecessary administrative complexity may arise.

Accordingly, SHOT supports adopting nationally consistent terminology where doing so does not alter the substantive operation of the legislation.

Importance of Consistent Terminology

Firearms legislation increasingly operates within a national regulatory environment.

Firearms may lawfully be:

- transferred interstate;
- inherited;
- temporarily imported;
- permanently imported;
- exported;
- repaired by interstate dealers.

Similarly, police agencies increasingly exchange intelligence through national systems.

Consistent terminology assists:

- law enforcement;
- firearms registries;
- dealers;
- courts;
- firearm owners.

Uniform language also reduces the likelihood of differing legal interpretations between jurisdictions.

Plain English Drafting

SHOT also supports the broader objective of improving readability.

Legislation should be understandable not only to lawyers but also to the ordinary licence holders required to comply with it.

Modern drafting principles favour language that is:

- clear;
- consistent;
- precise;
- readily understood.

Updating terminology provides an opportunity to improve accessibility without altering legal obligations.

Amendment 6

Clarification of the Definitions of "Firearm" and "Firearm Part"

Government Proposal

The Bill proposes clarifying the definitions of "firearm" and "firearm part" following receipt of expert advice.

The Consultation Information Sheet does not elaborate on the content of that expert advice or identify the specific issues the amendments seek to address.

SHOT Position

SHOT supports clarification but recommends careful drafting and extensive consultation before final definitions are adopted.

The legal definition of a firearm or firearm part determines the scope of many criminal offences throughout the Act.

Accordingly, even relatively small changes in wording may have significant consequences.

The Importance of Precision

Firearms are complex mechanical devices comprising numerous individual components.

Some parts are essential to the operation of a firearm.

Others are:

- cosmetic;
- interchangeable;
- aftermarket accessories;
- maintenance items.

Legislation should clearly distinguish between these categories.

Definitions should not inadvertently capture components that present little or no independent public safety risk.

Similarly, uncertainty regarding whether an item constitutes a regulated firearm part may expose otherwise law-abiding individuals to criminal liability despite genuine attempts to comply with the law.

Legal Certainty

One of the fundamental principles of criminal law is that legislation should clearly define prohibited conduct.

Individuals should be able to determine, with reasonable certainty, whether possession of a particular component requires:

- registration;
- licensing;
- dealer involvement;
- police approval.

Where ambiguity exists, compliance becomes unnecessarily difficult.

Clear definitions therefore benefit both regulators and the regulated community.

Consistency with Other Australian Jurisdictions

SHOT supports efforts to harmonise definitions nationally where practical.

However, consistency should not come at the expense of clarity.

If national terminology remains uncertain or inconsistently interpreted elsewhere, Tasmania should avoid importing those ambiguities into its own legislation.

National consistency should improve certainty—not reduce it.

Practical Examples

During consultation, Government may wish to consider publishing practical guidance explaining how the revised definitions will apply.

Examples could include:

- replacement barrels;
- bolts;
- receivers;
- frames;
- trigger assemblies;
- suppressors;
- magazines where separately regulated;
- unfinished components;
- aftermarket accessories.

Illustrative guidance assists licence holders, dealers and police officers in applying the legislation consistently.

Interaction with Criminal Offences

The Questions and Answers document notes that possession of firearm parts may attract significant criminal penalties under the proposed amendments.

Given these consequences, Parliament should ensure that any expanded definition of "firearm part" is:

- objectively clear;
- technically accurate;
- capable of consistent interpretation.

Criminal offences should not depend upon uncertain technical classifications.

Technical Consultation

SHOT recommends that Government continue consulting:

- firearms examiners;
- armourers;
- licensed dealers;
- sporting organisations;
- collectors;
- industry representatives.

These groups possess practical expertise regarding firearm design and operation and can assist in identifying unintended consequences before legislation is finalised.

Avoiding Unintended Criminalisation

SHOT is concerned that overly broad drafting could inadvertently criminalise possession of common components that have traditionally been regarded as unregulated.

Where Parliament intends to regulate particular parts independently of complete firearms, those parts should be expressly identified.

This approach provides greater certainty than relying upon broad general definitions that may later require judicial interpretation.

SHOT Recommendations

Recommendation 1

SHOT supports updating terminology to improve national consistency.

Recommendation 2

The revised definitions of "firearm" and "firearm part" should be technically precise and supported by published explanatory material.

Recommendation 3

Government should consult recognised technical experts before finalising the definitions.

Recommendation 4

Illustrative guidance should accompany commencement of the amendments to assist consistent interpretation.

Recommendation 5

Definitions should avoid capturing components that present no independent public safety risk unless Parliament clearly intends that outcome.

Conclusion

Although Amendments 5 and 6 are primarily administrative, they underpin the operation of many other provisions within the Firearms Act.

SHOT therefore supports modernising terminology and clarifying statutory definitions, provided that the resulting legislation improves legal certainty, promotes national consistency and avoids unintended consequences for responsible firearm owners, dealers and sporting organisations.

Precise drafting in this area will strengthen both compliance and enforcement while reducing the likelihood of unnecessary legal disputes.

Amendments 7, 8 and 11 – Notification Obligations

Introduction

Amendments 7, 8 and 11 introduce significant changes to the notification obligations imposed upon licensed firearm owners.

Individually, each amendment appears administrative in nature. Collectively, however, they represent a substantial expansion of the reporting responsibilities of every firearms licence holder in Tasmania.

The proposed amendments require licence holders to:

- notify Tasmania Police if firearms are to be stored at a location other than their registered residential address for more than 24 hours;

- notify Tasmania Police at least 24 hours before changing their residential address, or as soon as practicable afterwards where prior notice is not possible; and
- notify Tasmania Police at least seven days before any change in personal particulars, replacing the existing requirement to notify within fourteen days after the change.

The Government has indicated these amendments are intended to improve the accuracy of firearms registry information and support the operation of the National Firearms Register.

SHOT acknowledges the importance of maintaining accurate firearms records. However, the effectiveness of any additional reporting obligation should be assessed against three key questions:

1. Will it produce a measurable improvement in public safety?
2. Is it practical for ordinary licence holders to comply?
3. Does the operational benefit justify the increased administrative burden?

General Principles

Accurate information is essential to the administration of any firearms registry.

Tasmania Police should have confidence that firearms are lawfully possessed, securely stored and capable of being traced where necessary.

SHOT therefore supports reasonable reporting requirements that contribute directly to these objectives.

However, reporting obligations should also recognise that the overwhelming majority of firearm owners are compliant individuals who already fulfil numerous statutory responsibilities.

Each additional reporting requirement carries both compliance costs for licence holders and administrative costs for Tasmania Police.

Good regulatory design requires that these costs be proportionate to the benefits achieved.

Amendment 7

Notification of Temporary Storage at Another Location

Government Proposal

The Bill proposes that where a firearm is intended to be stored at a location other than the registered owner's residential address for a period exceeding 24 hours, Tasmania Police must be notified.

SHOT Position

SHOT supports the objective of maintaining accurate registry information but does not support the proposed 24-hour threshold in its current form.

The proposal appears intended to improve police knowledge regarding the location of registered firearms.

While this objective is understandable, SHOT is concerned that the proposed threshold is unnecessarily short and will create substantial administrative workload while delivering limited operational benefit.

Practical Realities

Many responsible firearm owners regularly store firearms away from their principal residence for legitimate reasons.

Examples include:

- multi-day hunting trips;
- attendance at shooting competitions;
- firearms training courses;
- temporary storage at approved rural properties;
- repairs undertaken by licensed gunsmiths;
- travel associated with pest animal management;
- extended visits to family-owned farms.

Under the proposed amendment, many ordinary recreational activities may trigger a statutory notification requirement.

This will substantially increase the volume of notifications received by Tasmania Police.

Administrative Burden

The practical consequence of a 24-hour notification threshold may be tens of thousands of additional notifications each year.

Tasmania Police would be required to:

- receive notifications;
- record new storage locations;
- update registry information;
- manage subsequent changes when firearms return home.

SHOT questions whether processing this volume of administrative information represents the best use of police resources.

Those resources may instead be more effectively directed towards:

- compliance inspections;
- criminal investigations;
- illicit firearms intelligence;
- firearms theft prevention.

Alternative Approach

SHOT recommends consideration of a longer reporting threshold.

Possible alternatives include:

- seven days;
- fourteen days; or
- notification only where storage becomes permanent or indefinite.

These alternatives would continue to provide police with meaningful information while significantly reducing unnecessary administrative burden.

Amendment 8

Notification of Residential Address Changes

Government Proposal

Licence holders would be required to notify Tasmania Police at least 24 hours before changing residential address, or as soon as practicable afterwards where advance notice is not possible.

SHOT Position

SHOT supports timely notification of address changes but considers the proposed advance notification requirement to be unnecessarily prescriptive.

Most responsible firearm owners already notify Tasmania Police when changing address.

The question is therefore not whether notification should occur, but when.

Practical Difficulties

Residential moves do not always occur according to a fixed timetable.

Unexpected circumstances may include:

- employment transfers;
- family emergencies;
- rental property availability;
- natural disasters;
- relationship breakdowns;
- urgent relocation for health reasons.

In these circumstances advance notification may not always be possible.

The proposed wording recognises this by allowing notification "as soon as practicable" where necessary.

SHOT supports retaining this flexibility.

Operational Value

SHOT accepts that knowing the current residential address of licence holders is important.

However, it is less clear that receiving notification 24 hours before the move provides materially greater public safety than receiving notification within a reasonable period afterwards.

The consultation material does not explain why advance notification is operationally necessary.

SHOT therefore recommends that Government publish the operational rationale supporting the proposed timeframe.

Amendment 11

Notification of Changes in Personal Particulars

Government Proposal

Licence holders would be required to notify Tasmania Police at least seven days before changes in personal particulars.

The existing legislation requires notification within fourteen days after the change.

SHOT Position

SHOT supports keeping licence records current but has concerns regarding the practicality of requiring advance notification.

Many changes in personal particulars occur unexpectedly.

Examples include:

- changes in employment;
- changes in contact details;
- legal name changes following marriage;
- changes resulting from court orders;
- emergency contact changes.

In many cases individuals cannot reasonably provide seven days' notice because the change itself has not yet occurred.

Administrative Practicality

Current legislative arrangements require notification after the event.

This reflects the practical reality that people generally notify government agencies once changes have occurred.

The proposed amendment reverses that approach.

SHOT is concerned that this may inadvertently increase technical non-compliance without delivering a corresponding improvement in registry accuracy.

Cumulative Effect of the Amendments

Although each amendment is relatively modest when considered individually, together they create a significant expansion of reporting obligations.

Following commencement, responsible firearm owners may be required to notify Tasmania Police regarding:

- temporary storage locations;
- residential address changes;
- changes in personal particulars;
- lending arrangements;
- other matters associated with implementation of the National Firearms Register.

Collectively these requirements represent a substantial increase in administrative interaction between licence holders and government.

Before implementing these obligations, SHOT recommends that Government assess:

- expected notification volumes;
 - staffing implications;
 - processing times;
 - system capacity;
 - compliance costs for licence holders.
-

Digital Reporting

If Parliament proceeds with these amendments, SHOT strongly recommends the development of a secure online reporting portal.

Electronic reporting would:

- reduce administrative costs;
- improve data accuracy;
- provide immediate confirmation of notification;
- reduce processing delays;
- improve user compliance.

Licence holders should receive an electronic receipt confirming that their notification has been successfully lodged.

Education Rather Than Punishment

New reporting obligations should initially be supported through education rather than enforcement.

SHOT recommends a transitional compliance period during which Tasmania Police prioritise:

- public education;
- guidance material;
- online resources;
- assistance to licence holders.

Penalty-based enforcement should occur only after licence holders have been given a reasonable opportunity to understand the new requirements.

SHOT Recommendations

Recommendation 1

Amendment 7 should be amended by increasing the notification threshold for temporary storage to a more practical period or limiting notification to long-term storage arrangements.

Recommendation 2

The requirement for advance notification of residential address changes should remain flexible, recognising that many moves occur unexpectedly.

Recommendation 3

The existing post-event notification requirement for changes in personal particulars should be retained unless evidence demonstrates a clear operational need for advance notification.

Recommendation 4

Government should establish a secure online notification system before these amendments commence.

Recommendation 5

A public education campaign and transitional implementation period should accompany the introduction of any new reporting requirements.

Conclusion

SHOT recognises that accurate registry information contributes to effective firearms administration and supports reasonable measures that improve the integrity of the National Firearms Register.

However, regulatory obligations should remain practical, proportionate and evidence-based.

The proposed notification requirements, particularly those relating to temporary storage and advance reporting, risk creating significant administrative burden for both licence holders and Tasmania Police without clear evidence that they will materially improve public safety.

SHOT therefore recommends that these provisions be revised to achieve the Government's objectives while reducing unnecessary complexity and promoting voluntary compliance.

Amendments 9, 10 and 12

Dealer Operations, Interstate Licence Recognition and Firearm Inspection Powers

Introduction

Amendments 9, 10 and 12 each relate to the practical administration of the Firearms Act 1996. While they address different subject matter, they share a common objective of improving the efficiency of firearms regulation and law enforcement.

These amendments propose to:

- expand the authority of employees of licensed firearms dealers;
- shorten the timeframe within which interstate residents relocating to Tasmania must obtain a Tasmanian firearms licence; and
- extend police powers to require production of firearms for inspection from any person in possession of a firearm, rather than only the registered owner.

Unlike several earlier amendments, these proposals are directed primarily at improving administrative efficiency rather than changing the categories of firearms that may be lawfully possessed.

SHOT generally supports reforms that improve operational efficiency where they do not unnecessarily increase the burden on responsible firearm owners or reduce appropriate safeguards.

Amendment 9

Expanded Authority for Firearms Dealer Employees

Government Proposal

The Bill proposes to expand the authority of employees of licensed firearms dealers by allowing them to possess and handle firearms and firearm parts, and to purchase and sell firearms in the absence of the holder of the firearms dealer licence.

SHOT Position

SHOT supports this amendment.

Licensed firearms dealers play a critical role within Tasmania's firearms regulatory system.

They are responsible for:

- lawful transfers;
- secure storage of commercial firearms;
- maintaining statutory records;
- conducting identification checks;
- assisting with registration processes;
- ensuring compliance with licensing requirements.

Modern firearms businesses frequently employ experienced staff who already undertake many day-to-day responsibilities under the supervision of the dealer licence holder.

Recognising these practical realities through legislation is both sensible and consistent with contemporary business practice.

Business Continuity

Many firearms businesses are small regional enterprises.

There are numerous occasions where the licence holder may be temporarily absent due to:

- illness;
- attendance at trade events;
- supplier meetings;
- training;
- deliveries;
- court attendance;
- annual leave.

Under the existing legislative framework, these absences may unnecessarily interrupt business operations.

The proposed amendment will improve continuity while maintaining regulatory oversight.

Employee Suitability

Although SHOT supports the amendment, it is essential that employees exercising these powers remain appropriately vetted.

Persons authorised to:

- possess firearms;
- conduct transfers;
- receive firearms;
- complete sales documentation;

should remain subject to appropriate suitability requirements.

Government should clearly prescribe minimum standards, including:

- background checking;
- training requirements;
- supervision where appropriate;
- record-keeping obligations.

Maintaining public confidence requires assurance that expanded authority is accompanied by appropriate accountability.

Record Keeping

The increased operational authority granted to dealer employees should be matched by clear documentation requirements.

Dealer records should identify:

- the employee conducting the transaction;
- the date and time;
- the firearm concerned;
- supporting licence information.

This improves accountability while supporting implementation of the National Firearms Register.

SHOT Recommendation

SHOT supports Amendment 9, provided employees exercising these powers satisfy prescribed suitability requirements and dealer record-keeping obligations clearly identify the individual responsible for each transaction.

Amendment 10

Interstate Residents Moving to Tasmania

Government Proposal

The Bill proposes reducing the period within which interstate licence holders relocating permanently to Tasmania must obtain a Tasmanian firearms licence.

Currently many Category A and B licence holders have up to three months.

The proposed amendment requires application within seven days across all licence categories.

SHOT Position

SHOT supports the objective of timely licensing but considers seven days to be unnecessarily restrictive.

Government has a legitimate interest in ensuring that persons establishing permanent residence become subject to Tasmania's licensing system within a reasonable period.

However, the proposed timeframe should recognise the practical realities associated with interstate relocation.

Practical Considerations

Relocating interstate is often a complex process involving:

- securing accommodation;
- commencing employment;
- enrolling children in schools;

- arranging utilities;
- moving household possessions;
- transporting firearms lawfully;
- establishing secure firearm storage.

During the first week after relocation many individuals are still settling into their new residence.

Requiring completion of firearms licensing within seven days may prove difficult despite genuine efforts to comply.

Existing Interstate Compliance

Interstate licence holders have already satisfied licensing requirements in another Australian jurisdiction.

They are not unlicensed persons.

They are already subject to firearms regulation and have generally demonstrated compliance with their existing licensing obligations.

Accordingly, SHOT considers there is a distinction between:

- an individual entering Tasmania with an existing Australian firearms licence; and
- an individual seeking their first firearms licence.

This distinction should be recognised when determining appropriate transition periods.

Alternative Timeframes

SHOT recommends consideration of a more practical transitional period.

Possible alternatives include:

- twenty-eight days;
- forty-two days;
- sixty days.

Any of these options would continue to ensure prompt transfer into Tasmania's licensing framework while providing sufficient time for practical relocation activities.

SHOT Recommendation

SHOT recommends extending the proposed seven-day period to at least twenty-eight days unless evidence demonstrates that the shorter timeframe provides a measurable public safety benefit.

Amendment 12

Police Power to Require Production of Firearms

Government Proposal

The Bill proposes extending the power of police officers to require production of a firearm for inspection from any person in possession of the firearm, rather than only its registered owner.

The Questions and Answers document explains that this amendment supports enforcement where firearms are lawfully possessed by persons other than the registered owner, such as borrowers.

SHOT Position

SHOT supports this amendment.

SHOT recognises that lawful possession and registered ownership are not always the same.

Examples include:

- temporary lending;
- supervised hunting;
- firearms training;
- approved competitions;
- dealer repairs.

In these situations, limiting inspection powers to registered owners may unnecessarily complicate enforcement.

Accountability

The proposed amendment reflects the practical reality that responsibility for safe possession rests with the person who currently has physical control of the firearm.

Where police lawfully request inspection, the person in possession should ordinarily be capable of producing the firearm.

This promotes accountability while assisting police investigations.

Appropriate Safeguards

Although SHOT supports the amendment, police powers should continue to be exercised consistently with established legal principles.

Requests for inspection should remain:

- lawful;
- reasonable;
- proportionate;
- connected to the statutory purpose.

Nothing in the proposed amendment should diminish existing legal protections relating to procedural fairness or the lawful exercise of police powers.

Education

The expansion of inspection powers should be accompanied by public guidance explaining:

- when police may exercise the power;
- the obligations of persons in possession;
- circumstances where immediate production may not be possible;
- consequences of non-compliance.

Clear guidance will assist both licence holders and police officers.

SHOT Recommendations

Recommendation 1

SHOT supports Amendment 9, subject to appropriate employee suitability and record-keeping requirements.

Recommendation 2

The transition period for interstate residents relocating permanently to Tasmania should be extended from seven days to at least twenty-eight days.

Recommendation 3

SHOT supports Amendment 12 extending inspection powers to persons lawfully in possession of firearms.

Recommendation 4

Government should publish operational guidance regarding the exercise of the amended inspection powers.

Conclusion

Amendments 9, 10 and 12 generally represent practical administrative reforms that improve the operation of Tasmania's firearms regulatory framework.

SHOT supports modernising dealer operations and clarifying police inspection powers.

However, the proposed seven-day licensing requirement for interstate residents should be reconsidered to better reflect the practical realities of relocation while still ensuring timely integration into Tasmania's firearms licensing system.

With these refinements, these amendments are capable of improving administrative efficiency without imposing unnecessary burdens on responsible firearm owners.

Amendments 13, 14, 15, 16 and 20

Firearm Crime, Stolen Firearms and Mandatory Minimum Sentencing

Introduction

Amendments 13, 14, 15, 16 and 20 represent the most significant criminal law reforms contained within the Firearms Amendment (Miscellaneous) Bill 2026.

Collectively, these amendments seek to:

- strengthen offences relating to stolen firearms;
- improve prosecution options for firearm offences;
- create summary offences for stealing firearms;
- introduce mandatory minimum terms of imprisonment for certain firearm offences; and
- improve the efficiency of the criminal justice system.

Unlike many of the administrative amendments contained elsewhere in the Bill, these proposals are directed squarely at criminal offending rather than the regulation of lawful firearm ownership.

SHOT has consistently maintained that legislation should focus on those individuals who unlawfully acquire, traffic, steal or misuse firearms.

Accordingly, SHOT is broadly supportive of reforms that strengthen the response to serious firearm crime, provided they remain consistent with established principles of criminal justice and judicial independence.

The Questions and Answers document provides additional clarification regarding the proposed offences, sentencing framework and mandatory minimum imprisonment provisions.

General Principle

Criminals Should Be the Primary Focus of Firearms Law

Throughout this submission SHOT has distinguished between:

- licensed firearm owners who comply with the law; and
- offenders who deliberately obtain or misuse firearms for criminal purposes.

These groups should not be treated as presenting the same level of risk.

The overwhelming majority of firearm crime involves individuals acting outside the lawful licensing framework.

They commonly obtain firearms through:

- theft;
- organised trafficking;
- illegal manufacture;
- unlawful importation;
- black-market transactions.

Measures directed towards these activities are far more likely to improve public safety than additional administrative regulation imposed upon compliant licence holders.

For this reason SHOT supports Government's objective of strengthening responses to firearm theft and organised criminal offending.

Amendment 13

Strengthening the Offence of Possession of a Stolen Firearm

Government Proposal

The Bill restructures the existing offence relating to possession of a stolen firearm, increases the applicable penalties and clarifies prosecution arrangements.

The Questions and Answers document explains that the amendments also support the introduction of mandatory imprisonment in certain circumstances.

SHOT Position

SHOT supports stronger penalties for knowingly possessing stolen firearms.

Individuals who knowingly possess stolen firearms contribute directly to the illicit firearms market.

Demand for stolen firearms encourages theft.

Reducing demand is therefore an important component of reducing supply.

SHOT considers that persons who knowingly possess stolen firearms should face appropriately serious penalties.

Knowledge Remains Critical

SHOT emphasises that criminal liability should continue to depend upon appropriate fault elements.

The law has traditionally distinguished between:

- a person who knowingly possesses stolen property; and
- a person who unknowingly comes into possession of property later discovered to have been stolen.

This distinction should remain clear.

The legislation should continue to require prosecutors to establish the necessary mental element before criminal liability arises.

Amendment 14

Alternative Verdict for Unlawful Trafficking

Government Proposal

Where a defendant is charged with unlawful trafficking in firearms, but the evidence does not establish trafficking, a court may instead convict the defendant of possession of a stolen firearm where that offence is proved.

SHOT Position

SHOT supports this amendment.

Alternative verdict provisions are well established throughout Australian criminal law.

They promote efficient administration of justice by allowing courts to convict offenders of offences actually established by the evidence, even where every element of the principal charge has not been proven.

This avoids unnecessary retrials while maintaining fairness to the accused.

Efficient Justice

Without alternative verdict provisions, prosecutions may fail despite evidence clearly establishing serious criminal conduct.

The proposed amendment reduces that risk.

Provided defendants retain full procedural fairness and the prosecution continues to bear the burden of proof beyond reasonable doubt, SHOT supports this reform.

Amendment 15

Summary Trial of Firearm Trafficking Offences

Government Proposal

The Bill proposes allowing unlawful trafficking offences to be heard summarily where both the prosecution and the defendant consent.

SHOT Position

SHOT supports this amendment.

Summary disposition is already available for numerous criminal offences where:

- the alleged offending is less serious;
- the facts are straightforward;
- both parties consent.

Providing this option may:

- reduce court delays;
- lower prosecution costs;

- deliver faster outcomes;
- reduce stress for victims and witnesses.

Importantly, the proposal does not remove the right to trial in more serious matters.

The consent of both parties provides an appropriate safeguard.

Amendment 16

Summary Offence of Stealing a Firearm

Government Proposal

The Bill creates a summary offence of stealing a firearm or firearm part that mirrors the existing indictable offence under the Criminal Code.

SHOT Position

SHOT strongly supports this amendment.

Firearm theft presents one of the greatest risks to community safety.

Every firearm stolen from a lawful owner creates the possibility that it will enter the illicit market.

Creating an additional summary offence allows prosecutors greater flexibility when dealing with less complex matters while ensuring offenders remain accountable.

This is likely to improve the efficiency of the justice system without reducing the seriousness with which firearm theft is regarded.

Firearm Theft Should Remain a Priority

SHOT encourages continued investment in:

- firearm theft investigations;
- forensic examination;
- intelligence-led policing;
- organised crime investigations.

Legislation alone cannot reduce firearm theft.

Effective enforcement remains equally important.

Amendment 20

Mandatory Minimum Sentences

Government Proposal

The Bill introduces a mandatory minimum sentence of three months' imprisonment for:

- possession of a stolen firearm; and
- stealing a firearm.

The Questions and Answers document explains that limited statutory exceptions are proposed, including circumstances involving youth offenders, persons with mental impairment, or where imprisonment would be unjust in the particular circumstances.

SHOT Position

SHOT supports strong sentencing for serious firearm crime but approaches mandatory minimum sentencing with caution.

There is no doubt that:

- firearm theft;
- firearm trafficking;
- possession of stolen firearms;

are serious criminal offences deserving substantial penalties.

The question for Parliament is whether mandatory minimum sentencing represents the most effective means of achieving deterrence and protecting the community.

Deterrence

Mandatory sentencing is often justified on the basis of deterrence.

However, deterrence depends upon numerous factors, including:

- likelihood of detection;
- speed of prosecution;
- certainty of conviction;
- severity of punishment.

Research in criminal justice has frequently suggested that the certainty of apprehension may have a greater deterrent effect than marginal increases in sentence length.

Accordingly, SHOT encourages Government to continue investing in investigative capability alongside sentencing reform.

Judicial Discretion

Australian courts have traditionally exercised discretion in sentencing to account for:

- seriousness of offending;
- prior criminal history;
- personal circumstances;
- degree of culpability;
- prospects of rehabilitation.

Mandatory minimum sentencing necessarily limits that discretion.

The Questions and Answers document recognises this issue by preserving limited exceptions where imprisonment would be unjust or where particular categories of offenders are involved.

SHOT welcomes these safeguards.

Proportionality

One of the cornerstones of criminal justice is proportionality.

The punishment imposed should reflect:

- the seriousness of the offence;
- the offender's culpability;
- the circumstances of the case.

Where Parliament establishes mandatory minimum penalties, careful drafting is essential to ensure exceptional cases may still receive appropriate judicial consideration.

Public Confidence

The community rightly expects significant consequences for persons who steal firearms or knowingly possess stolen firearms.

Strong sentencing can reinforce public confidence in the administration of justice.

However, confidence is also strengthened where courts retain sufficient flexibility to avoid outcomes that would plainly be unjust.

The balance proposed within the Bill should therefore be carefully examined during Parliamentary debate.

SHOT Recommendations

Recommendation 1

SHOT supports increased penalties for knowingly possessing stolen firearms.

Recommendation 2

SHOT supports the creation of a summary offence of stealing a firearm or firearm part.

Recommendation 3

SHOT supports alternative verdict provisions for unlawful trafficking prosecutions.

Recommendation 4

SHOT supports summary disposition of trafficking offences where both parties consent.

Recommendation 5

Mandatory minimum sentencing should retain carefully drafted judicial discretion for exceptional circumstances, consistent with the safeguards outlined in the Government's Questions and Answers document.

Recommendation 6

Government should continue investing in enforcement, intelligence gathering and organised crime investigations to ensure sentencing reforms are supported by effective detection and prosecution.

Conclusion

SHOT strongly supports legislation that targets those who steal, traffic or knowingly possess stolen firearms.

These offenders represent a genuine threat to public safety and are fundamentally different from the licensed firearm owners who comply with Tasmania's firearms laws.

The coalition therefore welcomes the Government's focus on strengthening responses to serious firearm crime.

At the same time, SHOT encourages Parliament to ensure that sentencing reforms preserve appropriate safeguards, maintain proportionality and continue to allow courts to respond fairly to exceptional cases.

By combining strong criminal sanctions with effective policing and intelligence-led enforcement, these amendments have the potential to make a meaningful contribution to reducing illicit firearm crime in Tasmania.

Amendments 17 and 18

Firearm Prohibition Orders and Magazine Capacity Limits

Introduction

Amendments 17 and 18 propose two significant reforms that extend beyond administrative changes and directly affect the regulation of lawful firearm ownership.

The amendments propose to:

- expand the scope of Firearm Prohibition Orders (FPOs) to include firearm parts, ammunition and suppressors; and

- introduce magazine ammunition capacity limits for certain Category A and Category B firearms.

These proposals have different objectives but share a common purpose of reducing the risk that firearms, or components associated with firearms, may be accessed or used by persons considered to present an unacceptable risk to public safety.

SHOT supports legislation that prevents prohibited persons from accessing firearms and associated equipment. However, any extension of regulatory powers should remain evidence-based, proportionate and supported by clear operational justification.

Similarly, restrictions affecting lawfully owned firearms should be based upon demonstrable public safety benefits and should avoid imposing unnecessary burdens on responsible firearm owners.

Amendment 17

Expansion of Firearm Prohibition Orders

Government Proposal

The Bill proposes extending the operation of Firearm Prohibition Orders so that they apply not only to firearms, but also to:

- firearm parts;
- ammunition; and
- suppressors.

The proposal recognises that access to these items may facilitate unlawful firearm possession or criminal offending even where a complete firearm is not immediately available.

SHOT Position

SHOT supports this amendment in principle.

Firearm Prohibition Orders exist to restrict access to firearms by individuals who have been assessed as presenting an unacceptable risk to public safety.

If Parliament has determined that a person should not possess firearms, it follows logically that restrictions should also extend to components that are essential to the operation of those firearms.

SHOT therefore supports expanding Firearm Prohibition Orders to include:

- major firearm parts;
- ammunition;
- suppressors.

This proposal is consistent with the objective of preventing prohibited persons from circumventing the intent of the legislation.

Closing Legislative Gaps

Without these amendments, a prohibited person may potentially possess items closely associated with firearm use while remaining unable to possess the firearm itself.

Although those items may have limited utility in isolation, their possession may:

- facilitate future offending;
- support unlawful firearm assembly;
- indicate continuing involvement with illicit firearm activity.

Closing these gaps strengthens the effectiveness of existing prohibition orders.

Importance of Clear Definitions

Although SHOT supports the amendment, the legislation should clearly define:

- firearm part;
- ammunition;
- suppressor.

These definitions should be consistent with those introduced under Amendment 6.

Poorly defined terms may create uncertainty regarding:

- replacement components;
- collector items;
- inert components;
- display articles.

Legislation should make clear precisely which items are captured by the prohibition.

Enforcement

The effectiveness of Firearm Prohibition Orders depends primarily upon enforcement.

SHOT encourages continued investment in:

- intelligence-led policing;
- compliance monitoring;
- targeted investigations;
- information sharing through the National Firearms Register.

Legislative reform should complement, rather than replace, proactive policing.

Recommendation

SHOT supports Amendment 17 subject to:

- clear statutory definitions;
 - consistent national terminology;
 - practical guidance regarding enforcement.
-

Amendment 18

Magazine Ammunition Capacity Limits

Government Proposal

The Bill proposes introducing magazine ammunition capacity limits for certain Category A and Category B firearms to further enhance public safety.

The Consultation Information Sheet does not identify the proposed numerical limits or specify which firearm types will be affected.

Similarly, the consultation material does not identify the evidence relied upon in determining the proposed limits.

SHOT Position

SHOT does not support Amendment 18 in its present form.

SHOT recognises that governments may legitimately regulate magazine capacity where evidence demonstrates that doing so is likely to improve public safety.

However, the consultation material currently provides insufficient information to allow stakeholders to assess:

- which firearms are affected;
- the proposed capacity limits;
- the evidence supporting those limits;
- the anticipated public safety outcomes.

Without this information, meaningful consultation is difficult.

Lack of Supporting Evidence

One of SHOT's principal concerns is the absence of published evidence supporting the proposal.

The consultation material does not identify:

- firearm offences in Tasmania involving higher-capacity magazines;
- trends in criminal misuse;
- operational advice recommending specific limits;
- comparative analysis with other Australian jurisdictions.

Before Parliament introduces new restrictions affecting lawful firearm owners, SHOT considers that this evidence should be publicly available.

Impact on Responsible Firearm Owners

Magazine capacity restrictions primarily affect persons who lawfully possess registered firearms.

Many responsible firearm owners use detachable magazines for legitimate purposes including:

- recreational target shooting;
- hunting;

- approved competitions;
- pest animal management.

Where magazine limits require replacement of existing equipment, affected licence holders may incur additional expense despite having complied fully with existing legislation.

Practical Considerations

Magazine capacity may have differing relevance depending upon the intended lawful use of the firearm.

Examples include:

Sporting Shooting

Different shooting disciplines utilise different equipment configurations.

Any proposed limits should be developed following consultation with recognised sporting organisations to avoid unintended consequences for legitimate competition.

Primary Production

Farmers engaged in pest animal management may require efficient operation where dealing with large numbers of invasive animals.

The consultation material does not explain whether these operational requirements were considered during policy development.

Firearm Safety

SHOT notes that safe firearm handling depends primarily upon:

- training;
- supervision;
- safe storage;
- responsible conduct.

Magazine capacity alone is not a substitute for these fundamental safety measures.

Evidence-Based Policy

SHOT acknowledges that Parliament may determine additional regulation is appropriate where supported by evidence.

However, significant restrictions upon lawfully owned equipment should be accompanied by:

- statistical analysis;
- operational advice;
- risk assessments;
- cost-benefit analysis.

This enables Parliament and stakeholders to properly evaluate whether the proposal is proportionate.

Regulatory Impact

If magazine limits proceed, Government should assess:

- costs to firearm owners;
- dealer inventory impacts;
- effects upon sporting disciplines;
- replacement equipment availability;
- compliance costs.

Where existing lawfully acquired magazines become prohibited, consideration should also be given to:

- compensation;
 - transitional arrangements;
 - disposal options.
-

Alternative Approaches

If Government's objective is reducing criminal misuse of firearms, SHOT considers there may be more effective alternatives including:

- stronger enforcement against illicit trafficking;
- increased penalties for firearm theft;
- improved intelligence sharing;
- enhanced border controls;

- targeted policing of organised crime.

These measures focus directly upon criminal activity rather than imposing additional restrictions upon licensed firearm owners.

SHOT Recommendations

Recommendation 1

SHOT supports extending Firearm Prohibition Orders to include firearm parts, ammunition and suppressors.

Recommendation 2

Government should ensure the relevant statutory definitions are precise and technically accurate.

Recommendation 3

Amendment 18 should not proceed until Government publishes:

- the proposed magazine capacity limits;
- the firearm categories affected;
- the evidence supporting the proposal;
- the anticipated public safety benefits.

Recommendation 4

If Parliament proceeds with magazine limits, legislation should provide:

- reasonable transitional arrangements;
 - consultation with sporting organisations and primary producers;
 - consideration of compensation where lawfully acquired property must be surrendered.
-

Conclusion

SHOT supports measures that strengthen Firearm Prohibition Orders and prevent prohibited persons from accessing firearms and essential firearm components.

However, the proposed introduction of magazine capacity limits has not, on the material released for consultation, been supported by sufficient evidence to enable meaningful public assessment.

SHOT therefore recommends that Parliament carefully consider whether the proposed restrictions are proportionate to the identified risk and whether alternative measures directed at criminal offending may better achieve the Government's stated public safety objectives.

Amendments 19 and 21

Modernising Identification Requirements and Electronic Dealer Records

Introduction

Amendments 19 and 21 are administrative reforms intended to modernise the operation of the *Firearms Act 1996* in preparation for implementation of the National Firearms Register (NFR).

Unlike many of the preceding amendments, these proposals do not alter firearm categories, licensing eligibility or criminal offences. Instead, they seek to improve the efficiency, consistency and reliability of firearms administration through:

- updating outdated legislative references relating to proof of identity; and
- allowing firearms dealer records to be created and maintained electronically.

SHOT supports sensible administrative reform where it improves efficiency, reduces unnecessary paperwork and enhances the integrity of firearm records without imposing unnecessary costs or regulatory burden on lawful firearms owners or businesses.

Amendment 19

Updating Identification Requirements

Government Proposal

The Consultation Information Sheet states that the *Firearms Act 1996* currently references repealed Commonwealth legislation relating to proof of identity.

The amendment updates these references to reflect current Commonwealth identity legislation and modern identification standards.

SHOT Position

SHOT fully supports Amendment 19.

This amendment is administrative in nature and appears necessary to ensure that Tasmania's firearms legislation remains legally current.

Legislation should accurately reference existing Commonwealth Acts and identity verification standards.

Where legislation continues to refer to repealed laws, uncertainty may arise regarding:

- acceptable identification documents;
- licensing procedures;
- administrative decision-making;
- legal interpretation.

Updating these references is both sensible and necessary.

Importance of Accurate Identification

Reliable identification forms an essential part of the firearms licensing system.

Accurate identity verification assists Tasmania Police to:

- correctly identify applicants;
- prevent duplicate identities;
- reduce fraud;
- ensure licence records accurately identify licence holders.

Modern identity verification also supports effective operation of the National Firearms Register by improving consistency between Australian jurisdictions.

Consistency with Other Government Services

Many government agencies have already modernised their identity verification systems.

Aligning firearms licensing requirements with contemporary government identity standards provides several benefits, including:

- consistency across agencies;
- reduced administrative confusion;
- improved efficiency;
- clearer guidance for applicants.

SHOT therefore considers this amendment to represent good legislative housekeeping.

Privacy Considerations

Although SHOT supports modern identity verification, personal information collected through licensing processes should continue to be protected.

Identity documents frequently contain sensitive personal information including:

- residential addresses;
- dates of birth;
- passport details;
- licence numbers.

Government should ensure that updated identification processes continue to comply with:

- privacy legislation;
- information security standards;
- data retention requirements.

Public confidence in the National Firearms Register depends not only upon accuracy but also upon appropriate protection of personal information.

Recommendation

SHOT supports Amendment 19.

Government should ensure that any revised identity verification procedures:

- remain consistent nationally;
 - minimise unnecessary duplication;
 - protect applicant privacy.
-

Amendment 21

Electronic Firearms Dealer Records

Government Proposal

The Bill proposes updating sections 91 and 93 of the *Firearms Act 1996* to permit dealer records to be created and maintained electronically in preparation for implementation of the National Firearms Register.

The amendment recognises that modern firearms regulation increasingly depends upon accurate electronic record keeping and information sharing.

SHOT Position

SHOT strongly supports Amendment 21.

Modern dealer businesses already operate within increasingly digital commercial environments.

Allowing electronic records represents a logical progression that is likely to:

- improve accuracy;
- reduce duplication;
- simplify auditing;
- facilitate implementation of the National Firearms Register.

Properly designed electronic systems also provide stronger record integrity than paper-based systems.

Benefits of Electronic Records

Electronic record systems provide numerous operational advantages.

These include:

Improved Accuracy

Electronic systems reduce transcription errors and improve consistency of information.

Mandatory data fields also reduce incomplete records.

Faster Information Sharing

Electronic records can be transferred more efficiently between:

- firearms dealers;
- Tasmania Police;
- interstate registries;
- the National Firearms Register.

This supports the Government's stated objective of improving national information sharing.

Audit Capability

Electronic systems provide detailed audit trails showing:

- when records were created;
- who created them;
- subsequent amendments;
- transaction history.

This strengthens accountability and assists regulatory oversight.

Disaster Recovery

Paper records remain vulnerable to:

- fire;
- flood;
- accidental loss;
- deterioration.

Properly backed-up electronic systems provide significantly improved resilience.

Small Business Considerations

Although SHOT supports electronic record keeping, implementation should recognise that many firearms dealers are small businesses.

Some regional dealers may require:

- software upgrades;
- staff training;
- new hardware;
- internet improvements.

Government should ensure that implementation timeframes allow sufficient opportunity for businesses to transition.

Consideration should also be given to:

- technical support;
- implementation guidance;
- reasonable commencement dates.

Cybersecurity

The move towards electronic records also creates new responsibilities.

Dealer systems should incorporate appropriate safeguards including:

- encrypted storage;
- password protection;
- secure backups;
- access controls;
- audit logging.

Government should publish minimum cybersecurity standards to protect sensitive firearms information.

System Compatibility

Electronic dealer systems should be compatible with the National Firearms Register.

Common data standards will:

- reduce duplication;
- improve accuracy;
- simplify reporting;
- minimise manual data entry.

Where possible, dealers should avoid having to enter the same information into multiple systems.

Avoiding Excessive Costs

SHOT encourages Government to consult closely with licensed firearms dealers before final implementation.

New compliance requirements should remain proportionate.

Implementation costs should be minimised through:

- standardised software specifications;
 - practical transition periods;
 - industry consultation.
-

National Firearms Register

Both Amendments 19 and 21 directly support implementation of the National Firearms Register.

SHOT has consistently supported improved information sharing between Australian police agencies where it enhances:

- firearm tracing;
- investigation of criminal activity;
- detection of stolen firearms;
- national consistency.

The success of the National Firearms Register, however, will depend upon:

- accurate information;
- secure systems;
- consistent national standards;
- ongoing funding.

The Register should improve policing capability without creating unnecessary duplication for lawful firearm owners.

SHOT Recommendations

Recommendation 1

SHOT supports Amendment 19 updating legislative references relating to identity verification.

Recommendation 2

Government should ensure revised identity verification procedures maintain appropriate privacy protections.

Recommendation 3

SHOT supports Amendment 21 permitting electronic dealer record keeping.

Recommendation 4

Implementation should include adequate transition periods and technical guidance for firearms dealers.

Recommendation 5

Government should establish minimum cybersecurity standards for electronic firearms records.

Recommendation 6

Electronic dealer systems should be fully compatible with the National Firearms Register to avoid duplication of data entry.

Conclusion

SHOT supports both Amendments 19 and 21.

These reforms represent sensible administrative modernisation that will improve the efficiency and integrity of Tasmania's firearms regulatory framework while supporting implementation of the National Firearms Register.

Provided appropriate safeguards are incorporated regarding privacy, cybersecurity and implementation costs, these amendments are likely to benefit both regulators and the lawful firearms industry.

Executive Summary, Consolidated Recommendations and Conclusion

Executive Summary

Shooting Hunting Outdoors Tasmania (SHOT) appreciates the opportunity to provide this submission regarding the **Firearms Amendment (Miscellaneous) Bill 2026**.

SHOT represents a coalition of lawful firearms owners, sporting shooters, hunters, recreational shooters, primary producers, firearm collectors, industry participants and affiliated organisations throughout Tasmania. Our members have a direct interest in ensuring Tasmania maintains a firearms regulatory framework that is effective, evidence-based and focused on improving public safety while recognising the rights and responsibilities of responsible firearms owners.

SHOT supports the Government's objective of reducing firearm crime and improving public safety. In particular, SHOT strongly supports measures that:

- strengthen intelligence sharing through the National Firearms Register;
- improve the tracing of firearms used in criminal activity;
- strengthen penalties for those who steal or knowingly possess stolen firearms;
- improve dealer record keeping;
- modernise outdated administrative processes; and
- target organised criminal activity involving firearms.

However, SHOT is concerned that several proposed amendments will impose significant new obligations upon licensed firearm owners without sufficient evidence that those measures will produce measurable improvements in community safety.

Throughout this submission, SHOT has sought to distinguish between:

- **criminal misuse of firearms**, which should be the primary focus of legislative reform; and
- **lawful firearm ownership**, which already operates within one of Australia's most comprehensive licensing and regulatory systems.

The coalition respectfully submits that legislation should concentrate resources on preventing criminal access to firearms rather than increasing administrative burdens on those who already comply with the law.

Overall Position on the Bill

SHOT's position on each amendment is summarised below.

Amendment	Subject	SHOT Position
1	Reclassification of straight-pull and button/lever release firearms	Oppose
2	Australian citizenship requirement	Oppose (current form)
3	Restrict on-lending	Support
4	Verification obligations	Support with amendments
5	Updated terminology	Support
6	Clarified firearm definitions	Support with consultation
7	Notification of temporary storage	Support objective – amend threshold
8	Advance address notification	Support with greater flexibility
9	Dealer employee powers	Support
10	Seven-day interstate licensing	Support objective – extend timeframe
11	Advance notification of personal particulars	Oppose current drafting
12	Police inspection powers	Support
13	Possession of stolen firearms	Support
14	Alternative verdict provisions	Support
15	Summary trafficking proceedings	Support
16	Summary firearm theft offence	Support
17	Expanded Firearm Prohibition Orders	Support
18	Magazine capacity limits	Oppose pending evidence
19	Updated identification provisions	Support
20	Mandatory minimum sentencing	Support with safeguards
21	Electronic dealer records	Support

Key Principles

Throughout this submission SHOT has consistently applied six guiding principles.

1. Evidence-Based Regulation

Restrictions affecting lawful firearm owners should be supported by demonstrable evidence showing that the proposed reforms are likely to improve public safety.

Where evidence has not been published, Parliament should exercise caution before introducing additional regulation.

2. Focus on Criminal Behaviour

Resources should be directed toward:

- organised crime;
- illicit trafficking;
- firearm theft;
- unlawful possession;
- repeat violent offenders.

These activities present the greatest risk to community safety.

3. Maintain Fairness for Lawful Owners

Tasmania's licensed firearm owners already operate under extensive regulatory oversight.

Additional obligations should only be introduced where they produce clear operational benefits.

4. Administrative Simplicity

Legislation should remain practical.

Requirements that cannot reasonably be complied with risk reducing confidence in the regulatory system.

5. National Consistency

SHOT supports harmonisation where it improves:

- information sharing;
- record accuracy;
- law enforcement cooperation;
- implementation of the National Firearms Register.

National consistency should not reduce clarity or impose unnecessary burdens.

6. Proportionality

Regulatory measures should remain proportionate to the risks they seek to address.

Public confidence is strengthened when legislation balances community safety with fairness and practicality.

Consolidated Recommendations

SHOT respectfully recommends that the Parliament consider the following recommendations.

Amendment 1

1. Do not proceed with the proposed reclassification unless independent evidence demonstrates a measurable public safety benefit.
 2. Publish the operational advice supporting reclassification.
 3. Release a Regulatory Impact Statement.
 4. Provide full compensation if compulsory surrender proceeds.
-

Amendment 2

5. Continue assessing licence eligibility based primarily upon suitability rather than citizenship.
 6. Publish evidence supporting the proposed citizenship requirement.
 7. Clearly define exemption criteria.
 8. Publish administrative guidelines for Commissioner exemptions.
-

Amendments 3–4

9. Support prohibition on on-lending.
 10. Adopt a "reasonable steps" test for verification obligations.
 11. Establish electronic licence verification.
 12. Clarify storage verification responsibilities.
-

Amendments 5–6

- 13. Support nationally consistent terminology.
 - 14. Clarify firearm and firearm part definitions through technical consultation.
 - 15. Publish practical guidance.
-

Amendments 7–8–11

- 16. Increase the temporary storage notification threshold.
 - 17. Retain flexibility for emergency relocations.
 - 18. Reconsider advance notification of personal particulars.
 - 19. Develop secure online notification systems.
 - 20. Introduce an education-first implementation period.
-

Amendments 9–10–12

- 21. Support expanded dealer employee authority.
 - 22. Extend interstate licence transition to at least twenty-eight days.
 - 23. Publish guidance regarding police inspection powers.
-

Amendments 13–16–20

- 24. Support stronger penalties for firearm theft.
 - 25. Support summary offences.
 - 26. Support alternative verdict provisions.
 - 27. Support trafficking matters proceeding summarily where appropriate.
 - 28. Retain judicial safeguards within mandatory sentencing.
 - 29. Continue investing in organised crime investigations.
-

Amendments 17–18

- 30. Support expanding Firearm Prohibition Orders.
 - 31. Publish evidence supporting magazine limits before implementation.
 - 32. Consult affected sporting organisations.
 - 33. Provide transitional arrangements where necessary.
-

Amendments 19–21

- 34. Support updated identity verification.
 - 35. Support electronic dealer records.
 - 36. Protect privacy and cybersecurity.
 - 37. Ensure compatibility with the National Firearms Register.
-

Recommendations to Government

Beyond the individual amendments, SHOT encourages the Tasmanian Government to continue investing in measures that directly target criminal misuse of firearms.

These include:

- improved intelligence sharing;
- cross-border investigations;
- organised crime enforcement;
- firearm theft prevention;
- stronger border controls;
- forensic capability;
- compliance inspections directed toward high-risk offenders.

These initiatives are more likely to reduce criminal firearm use than additional administrative obligations imposed upon licensed firearm owners.

Final Conclusion

SHOT supports the objective of maintaining Tasmania as one of Australia's safest jurisdictions while preserving a fair, effective and evidence-based firearms regulatory framework.

SHOT recognises that governments have an important responsibility to respond to emerging risks and to ensure that firearms legislation remains contemporary. Equally, legislative reform should be proportionate, supported by evidence and carefully targeted toward those who present genuine risks to community safety.

The overwhelming majority of Tasmania's licensed firearm owners are responsible, law-abiding citizens who comply with stringent licensing, storage and registration requirements. They should not bear unnecessary regulatory burdens where those measures have not been demonstrated to improve public safety.

SHOT therefore respectfully submits that Parliament should:

- support amendments directed at organised crime, firearm theft and illicit trafficking;
- support sensible administrative modernisation;
- reconsider amendments that disproportionately affect responsible firearm owners without clear evidence of benefit; and
- continue consulting broadly with affected stakeholders before implementing significant changes to Tasmania's firearms laws.

SHOT thanks the Tasmanian Government for the opportunity to contribute to this consultation and welcomes ongoing engagement as the legislation progresses.

End of Submission