



Submission cover sheet

Inquiry into Legislation on proposed firearms reform

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Australian Recreation Union



Submission to the Australian Capital Territory Firearms Review

The Australian Recreation Union (ARU) is a national body primarily comprising former and currently serving police officers and detectives, defence force specialists, and solicitors. The ARU represents roughly 1.8 million members, including both direct and associate members, many of whom are licensed firearms owners engaged in recreational shooting, hunting, and pest control activities.

The ARU welcomes the opportunity to provide comment on the proposals under consideration in the ACT Firearms Review, including those outlined in the Firearms (Public Safety) Amendment Bill 2026 and related reforms. This submission addresses Proposal 1: imposing a cap of five firearms per individual, with exemptions allowing primary producers, vertebrate pest animal controllers, occupational users, and sporting shooters to hold a maximum of 10 firearms.

Evidence Against Proposal 1-Extensive research, including Australian-specific studies, demonstrates no clear public safety benefit from arbitrary limits on the number of firearms owned by law-abiding citizens.

1. Kleck, G. "The Impact of Gun Ownership Rates on Crime Rates: A Methodological Review of the Evidence" (Journal of Criminal Justice) Summary: Among the strongest studies reviewed (41 total), only 2 supported the idea that higher gun ownership causes higher crime or homicide rates; 10 found higher ownership correlated with less crime; and 29 found no relationship.
2. Lott, J.R. "More Guns, Less Crime: Understanding Crime and Gun Control Laws" (University of Chicago Press) Summary: No evidence that higher ownership increases homicides; data instead suggest ownership deters crime. Limits on ownership would therefore not improve safety and could increase vulnerability.
3. Leigh, A., & Neill, C. "Do Gun Buybacks Save Lives?" (American Law and Economics Review) Summary: Australia's 1997 national buyback, which reduced civilian firearm ownership by approximately 20%, had no significant effect on firearm homicides, total homicides, or overall gun deaths across states. Violent crime rates were unaffected. The study concludes buybacks do not enhance public safety through reduced homicides.
4. Baker, J., & McPhedran, S. "Firearm Homicide in Australia: A Study of Trends and Comparisons" Summary: The National Firearms Agreement (NFA) had no discernible influence on firearm or total homicide patterns or rates, which remained stable before and after 1996. Comparable jurisdictions without strict ownership caps (e.g., New Zealand) showed similar homicide rates, indicating no public safety gain from such limits.
5. Taylor, L.J. "Do Fewer Guns Lead to Less Crime? Evidence from Australia" Summary: The NFA and buyback reduced armed robbery but had no significant effect on total homicides or overall violent crime rates. Public safety benefits were negligible beyond specific armed offences.
6. Kleck (2015) Review in Australian Context Summary: This meta-analysis (including Australian data) found no net effect of gun ownership levels on total homicide rates across 41 studies. Gun prevalence influences method choice but not the incidence of violence. Applied to the NFA, it indicates ownership caps would not reduce overall violence.

7. Australian Institute of Criminology reports (e.g., 2020) Summary: Total homicide rates in Australia have remained stable (~1.0–1.2 per 100,000) since the NFA, with no spike in non-firearm homicides and no accelerated decline attributable to ownership restrictions. Australia’s homicide rate has followed global trends unaffected by the reforms.

Discussion Points – Proposal 1-Limiting the number of firearms a person can possess

- Caps do not reduce homicide or crime rates There is no empirical evidence linking the number of firearms owned by law-abiding individuals to any measurable improvement in public safety.
- Law-abiding owners are disproportionately impacted Arbitrary caps penalise responsible licensed owners while having no demonstrated effect on criminal misuse of firearms.
- Reduced firearm availability is likely to produce less humane outcomes for animals during hunting and pest control The ACT’s proximity to NSW and its role in regional pest management require access to multiple appropriate firearms to ensure ethical and effective outcomes:
 - Calibre/game size mismatch – Using underpowered rounds on large animals such as sambar deer (up to 300 kg) risks shallow wounds, internal bleeding, and prolonged suffering.
 - Range and terrain variability – Hunters in the ACT and surrounding NSW regions encounter widely varying conditions, from dense forests to open plains. Different calibres and action types are required to match species, terrain, and distance while maintaining sufficient ballistic energy for immediate, humane kills.
 - Pest control volume – High-density feral animal operations, particularly for crop and environmental protection, often involve large groups of animals. Multiple firearms and action types allow rapid follow-up shots on wounded animals, minimising suffering.

Recommended calibre and action types

The ACT Environment, Planning and Sustainable Development Directorate (EPSDD) and NSW Game Management Authority set minimum calibres for humane dispatch. For example, a minimum calibre of .270 with a 130-grain projectile is required for sambar deer. However, experienced hunters and industry guidance consistently recommend .30-06 Springfield or larger calibres to achieve reliable, ethical results on mature sambar stags, reducing the risk of wounding and prolonged animal suffering. Each animal species has a minimum calibre for the humane dispatch of the animal and various terrain requires different rifle action types. This alone would require multiple firearms to ensure humane outcomes in each hunting or pest control scenario a typical participant is likely to encounter.

The ARU submits that Proposal 1 lacks evidentiary support and would impose unnecessary restrictions on responsible firearms owners while offering no identifiable public safety benefit and potentially compromising animal welfare outcomes.

Hunters’ Contribution to Pest Management Recreational hunters and volunteer pest controllers play a vital role in regional pest management, accounting for approximately 50% of their firearm use. In the ACT and surrounding NSW, these individuals are essential for controlling invasive vertebrate pests that threaten agriculture and the environment, particularly on private land where they often collaborate with landowners through access agreements. Volunteer pest controllers play a crucial role in managing pest species around Australia, including in the ACT and NSW, by reducing populations of feral animals such as pigs, deer, foxes, and rabbits. This volunteer effort helps mitigate agricultural losses exceeding billions annually nationwide, with feral deer alone posing risks of over \$2 billion in environmental and agricultural damage in regions bordering the ACT. Without such contributions, pest populations could surge by 20–50% according to overpopulation models, resulting in substantial additional losses. Thus, volunteer pest control delivers significant annual savings to the agricultural and environmental sectors.

Challenges in Pest Culling Operations Pest culling is crucial for protecting crops, livestock, and native ecosystems, where threats typically involve groups rather than isolated animals—for example, feral pigs often travel in sounders of 5 to hundreds, and deer in mobs. In these high-volume scenarios, bolt-action rifles can hinder efficiency due to slower cycle times, and limited-capacity magazines necessitate frequent changes, further reducing operational speed. Current

ACT provisions should align with national standards, with higher-capacity magazines available via permit-to-acquire approval where genuine need is demonstrated.

Recreational Hunters and the Need for Varied Firearms Recreational hunters fulfil two essential roles in modern society: the ethical harvesting of game for food and the management of invasive pest species. Both require access to a range of rifles to achieve humane, safe, and effective results. Hunters tailor their equipment to the terrain, game species, and required action type for an immediate, ethical kill. Higher-powered calibres are vital for larger species to ensure humane outcomes. In dense or challenging terrain—where retrieving a wounded animal is impractical—pump-action, button-release, or straight-pull rifles facilitate swift follow-up shots, minimising suffering. Bolt-action rifles, however, excel in open plains for precision long-range shooting. Guidelines from EPSDD and NSW authorities recognise that no single firearm can address the full spectrum of regional game species and diverse landscapes.

ARU alternative Position on Why More Than Five Firearms Are Generally Required · Recreational Hunters: If a baseline limit of five firearms should be allowed without individual permits to acquire, with automatic registration handled by licensed dealers. Firearms beyond this limit should require a permit to acquire, supported by justification demonstrating genuine need. However, a limit should not be placed on an arbitrary cap of 10 firearms; rather, cap the number of firearms based on the licence holder's needs, such as pest control (5 rifles for different calibres and actions suited to various pests like rabbits, foxes, pigs, and deer, ensuring humane dispatch in diverse terrains); target pistol shooting (5 pistols for different disciplines like ISSF, action pistol, and metallic silhouette, each requiring specific calibres and features for accuracy and safety); target shooting (5 rifles for disciplines including benchrest, F-class, and service rifle, where variations in barrel length, stock design, and optics are necessary for competitive performance); shotgun competitions (5 shotguns for trap, skeet, sporting clays, and double trap, with different chokes, barrel lengths, and actions optimised for each event); western action shooting (6 guns as at least 2 are required for each shooting category of competition, including single-action revolvers, lever-action rifles, and pump-action shotguns, to allow for main and backup firearms in timed events). These examples justify needs-based allowances, as restricting to arbitrary caps ignores the practical requirements for safe, ethical, and effective participation.

- **Discipline-Based Allowance:** A maximum of five firearms per shooting discipline undertaken by the licence holder.
- **Pest-Management Exemption:** Individuals involved in pest management on private land, including volunteers, should be exempt from the five-firearm cap, permitted up to ten firearms (or more based on needs) and magazine capacities of up to 20 rounds—aligning with provisions for primary producers. Persons who engage in volunteer pest control management in the ACT or NSW may have access to category C firearms and at least 10 firearms. Justification: Volunteers provide essential services in controlling pests that cross jurisdictional boundaries, reducing environmental damage and supporting biodiversity; limiting access would hinder these efforts, leading to increased pest populations and economic losses.
- **Licence Category Amendment:** The recreational hunting licence category should be updated to “General Hunting and Pest Management” to better reflect participants’ positive contributions. Additionally, hunting in NSW should be added as a genuine reason to hold a licence in the ACT, recognising the cross-border nature of activities for ACT residents.
- **New Licence Category:** Introduce a “Modern Collector and Enthusiast” category, enabling collecting enthusiasts to acquire modern rifles.

Additionally, rimfire rifles have an under-barrel magazine, which is extremely slow to reload, these rifles are used in pest management of rabbits and foxes, and metallic silhouette competitions; these are essential and should be exempt from any magazine cap due to the fixed nature of these magazines. Justification: The fixed tubular magazines in rimfire rifles, such as .22 LR models, hold rounds in a linear tube under the barrel, requiring manual loading one round at a time, which takes significantly longer than detachable magazines. This design inherently limits rapid firing, posing no public safety risk, while being critical for precise, low-recoil pest control (e.g., headshots on rabbits to minimise

suffering) and competitions where accuracy over speed is key; capping would render them ineffective without justification.

- **Allow category C rifles for sports shooting competitions-Justification:** Category C includes semi-automatic rimfire rifles and shotguns, which are used in disciplines like practical shotgun and rimfire benchrest; these promote skill development and safe handling, with no evidence linking them to misuse, enhancing recreational opportunities without compromising safety.
- Existing licence holders should have a grandfather clause allowing them to retain firearms, and all new licence holders should be subject to the changes.
- Amendments that farmers, landowners, primary producers, and persons with biodiversity stewardship arrangements should have access to category D rifles to allow them to better control pest species. Justification: Category D includes semi-automatic centrefire rifles, essential for high-volume pest control of large groups (e.g., feral pigs in sounders), providing rapid follow-up shots for humane and efficient management; this access supports environmental conservation and agricultural protection under stewardship agreements.

Proposal 2: Recategorizing Straight-Pull, Pump-Action, and Button/Lever-Release Firearms into Higher Categories (e.g., Category C), Limiting Their Access Primarily to Primary Producers

Evidence Against Reclassification

2.1) McPhedran, S., & Baker, J. (multiple papers in Injury Prevention and Journal of Law and Medicine) Summary: The NFA semi-automatic bans and buyback had little to no significant effect on firearm homicides or total homicide rates. No acceleration in declines beyond pre-1996 trends; mass shootings ceased but attributed to rarity, not bans. No broader public safety gains.

2.2) Lee, W.-S., & Suardi, S. "The Australian Firearms Buyback and Its Effect on Gun Suicides and Homicides" Summary: Semi-automatic bans/buyback showed no large or significant effects on firearm homicide rates ($p > 0.05$); total homicides unchanged post-1996. Declines predated reforms; no public safety improvement from action-type restrictions.

2.3) Australian Institute of Criminology (AIC) Trends & Issues: "Mass Shootings and Firearm Control—Comparing Australia and the United States" Summary: No net public safety effect beyond suicides; mass shooting drop not solely attributable to action-type restrictions.

2.4) Harvard School of Public Health Bulletin: "Australian Gun Buyback" Summary: Post-NFA evaluations found no beneficial effect of semi-auto restrictions on firearm homicide rates; declines not attributable to bans.

Overall Outcome of Studies Each study shows that the firearm's method of cycling has no attributable impact on public safety outcomes. The proposed reclassification will have no impact on reducing public safety risks.

Analysis of Rapid-Fire Events and Action Cycling Analysis of recent mass attack events involving firearms shows attackers typically lower the rifle, cycle the action, raise it, and aim, with intervals of 4–5 seconds between shots. The specific action type has no bearing on the speed of deliberate aimed fire. An Australian study comparing action types (straight-pull, pump-action, button/lever-release, and bolt-action) found cycling speeds of: · Bolt actions: 1–3 seconds · Pump action / Straight pull / Button release: 1–2 seconds While the 1–2 second difference appears minor, in dense, steep, or undulating terrain, it allows a critical second shot to ensure immediate humane dispatch of wounded animals. This highlights that action type has no correlation to increased public danger in criminal misuse, as deliberate aimed shooting (with sight picture reacquisition) adds consistent time regardless of mechanism. Sight picture reacquisition typically adds ~2 seconds, particularly at longer ranges.

ARU Position on Reducing Availability of Firearm Types to Hunters

- **Preferred Outcome:** Grandfather existing straight-pull, pump-action, and button/lever-release rifles for owners who have legally acquired them. Any further new purchases must require a permit to acquire from ACT Policing, with justification demonstrating reasonable necessity for the activity.
- **Alternative Outcome:** Amend higher category licences to expand grounds of approval to persons who engage in pest control on private land (whether voluntary or paid). Such approval should require a letter of authority from the landowner. This would support retaining access to these action types under an expanded category definition.

Proposal 3: Introducing Limits on Magazine Capacity for Category A and B Firearms This proposal would significantly restrict current capacities available under ACT law for manual-action rifles used in recreational shooting and pest control.

ARU Position on Magazine Capacity Reduction and Alternative Suggestions

- **General Support for Responsible Limits:** The ARU supports maintaining capacities that allow effective and humane pest control while aligning with national agreements.
- **Concessions should be made for Recreational Hunters in Pest Management:** If capacities are reduced, exemptions should be granted for recreational hunters and volunteers engaged in pest management on private land. Individuals involved in pest control supporting primary production or environmental outcomes should be permitted higher capacities (up to 20 rounds) and up to 10 firearms (or more based on needs) to enable efficient operations.
- **Exemption for Fixed-Tube or Floor-Plate Magazines:** Magazines with fixed tubes or floor plates—which cannot be easily reloaded—should be exempt from restrictive limits for recreational hunters.
- **Prohibition on Shotgun Magazine Extensions:** The use of shotgun magazine extension tubes to increase capacity beyond factory configuration should be prohibited.

Proposal 4: Restricting Firearms Licences to Australian Citizens Only, with a Carve-Out for New Zealand Permanent Residents in Roles Such as Primary Production or Security Agreed, with additional carve-outs:

- Support restricting licences to citizens as a sound measure. However, permanent residents should be eligible for annually renewable licences (maximum 12 months), during which they must apply for citizenship. An exemption should be included in the Firearms Act to permit singular supervised hunting opportunities for international visitors, supporting tourism.

Proposal 5: Citizenship Requirement for Firearms Licensing

- We support the proposal to restrict the issuance of firearms licences to Australian citizens, as this represents a sound and responsible policy position. However, it is essential that the legislation include a structured carve-out for permanent residents.
- Permanent residents should be eligible for a firearms licence only on an annual basis, with a maximum licence duration of 12 months. During this period, the individual must actively pursue Australian citizenship. This approach maintains public-safety integrity while providing a clear and fair pathway for long-term residents who are committed to becoming citizens.
- Additionally, the Firearms Act should expressly provide for single-occasion hunting permissions to support tourism and regional economic activity. This ensures that international visitors can participate in regulated hunting experiences without undermining the broader citizenship-based licensing framework.

Proposal 6

Increasing the use of criminal intelligence in firearms licensing decisions:

The increased use of criminal intelligence in firearms licensing decisions is generally supported, subject to essential safeguards. This capability already exists within the current licensing framework. However, automatic denial of a firearms licence on the basis of criminal intelligence should be confined to matters involving serious organised crime & terrorism. Any expansion of this power must remain subject to review by the courts and independent tribunals to preserve procedural fairness and natural justice. Criminal intelligence must be applied with great caution and subject to rigorous validation as this is generally unvalidated speculation or hearsay information. There is widespread concern— shared by many police officers who are members of the Australian Recreation Union— that existing intelligence systems, including Crime Stoppers and internal intelligence databases, are sometimes misused. Instances have been observed where false or trivial intelligence reports are created or encouraged to inflate statistical outputs for performance purposes. Additionally, Crime Stoppers is frequently used as a vehicle for reprisals, including in the context of domestic and family disputes.

For these reasons, we propose that:

- ACT Policing-generated intelligence reports must be formally validated and assessed using the “balance of probabilities” test before they can be relied upon in adverse licensing decisions.
- All other criminal intelligence relied upon to refuse, suspend, or revoke a firearms licence must undergo thorough scrutiny by the decision-maker and satisfy the Briginshaw standard, recognising the gravity and consequences of such decisions. These safeguards ensure that criminal intelligence is used as a legitimate tool to protect public safety, without enabling misuse, personal vendettas, or untested allegations to unjustly deprive individuals of their rights under the Firearms Act.

Lessons from Recent New South Wales Firearms Legislation Changes:

The ARU draws the Review’s attention to the recent experience in New South Wales, where significant amendments to firearms legislation were introduced and passed on 24 December 2025 via the Terrorism and Other Legislation Amendment Act 2025. Prior to these amendments, the NSW Police Force conducted a comprehensive internal review of the Firearms Act 1996 and associated regulations to assess whether they remained fit for purpose.

That review recommended no substantial changes, including:

- No additional restrictions on the types of firearms available to Category A and B licence holders,
- No amendments to existing magazine capacity limits (already restricted to 10 rounds for centrefire rifles, 15 rounds for rimfire rifles with fixed-tube magazines, and appropriate limits for shotguns),
- No reduction in standard licence terms,
- No introduction of mandatory club membership for licence holders who primarily shoot on private land, and no reduction in the right to independent administrative tribunal review.

The former ARU National Director met with Assistant Commissioner Kirsty Heyward APM (Police Prosecutions and Licensing Enforcement Command), who confirmed that NSW Police did not wish to propose changes to the Firearms Act or regulations without clear evidence supporting such changes. Assistant Commissioner Heyward explicitly stated there was no evidence to justify any of the reforms ultimately introduced on 24 December 2025.

Additionally, the Honourable John Ruddick MLC and the Honourable Roy Butler MP met with the NSW Police Minister, who confirmed that only minor or no changes were contemplated by police, and most certainly not the broad suite of restrictive measures that were ultimately enacted. Despite these assurances from senior police and the Minister, the NSW Government proceeded with sweeping reforms that lacked evidentiary support according to senior police, several politicians, and members of the Firearms Registry Consultative Council.

The ARU has formally referred allegations of corruption, serious maladministration, and misleading of Parliament by the NSW Premier and Police Minister to the Independent Commission Against Corruption (ICAC). These allegations

primarily concern the making of false and misleading assertions in Parliament and to the media in order to unduly influence public and parliamentary opinion, as well as the substantial waste of public funds—estimated at up to \$1–2 billion in NSW—for a proposed gun buyback scheme and related measures, in circumstances where no evidence warranted the legislation.

Final Recommendation to the ACT Firearms Review:

The ARU respectfully implores the reviewers to ensure that any recommended changes to the ACT's firearms framework are strictly evidence-based. The recent NSW experience demonstrates the risks of proceeding with significant reforms in the absence of supporting evidence, as confirmed by senior police, elected representatives, and consultative bodies. The ACT should avoid repeating measures that disproportionately impact law-abiding licence holders while offering no demonstrable public safety benefit. The ARU reiterates its opposition to the proposals under review on the grounds outlined in this submission and urges the adoption of an evidence-led, proportionate approach that recognises the positive contributions of licensed firearms owners to pest management, animal welfare, and recreational pursuits.

We thank the Review for its consideration of this submission and remain available to provide further information or oral evidence as required.