



Submission cover sheet

Inquiry into Legislation on proposed firearms reform

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Submission to the Inquiry into the Firearms Amendment Bill 2026 (ACT)

Executive Summary

- This submission opposes the proposed 5 and 10 firearm possession limits for licensed firearm owners in the Australian Capital Territory (ACT). There is no evidence that lawful firearm ownership presents a public safety risk in the ACT, nor that limiting the number of firearms held by fit and proper licence holders is necessary or proportionate to achieve the stated objectives of the Bill.
- The proposed amendments were developed without consultation with the firearms industry, sporting bodies, or organisations representing licensed owners. They rely on regulatory models from other jurisdictions that do not reflect the ACT's circumstances, lawful firearm uses, or existing compliance framework.
- Consistent with the **Human Rights Act 2004 (ACT)**, any limitation on individual rights must be demonstrably justified, rationally connected to a legitimate objective, and the least restrictive means reasonably available. The proposed firearm limits fail this test.
- Public safety would be more effectively enhanced through investment in licensing systems, completion of the National Firearms Register, intelligence sharing, and targeted measures addressing illicit firearm use.
- The submission also makes specific recommendations concerning straight-pull firearms, rimfire categorisation, and magazine definitions.

1. Introduction and Position

- I make this submission as a licensed firearm owner of over 40 years and a police officer with more than 30 years' experience in criminal investigation. I fully support the objective of protecting public safety and preventing firearm-related harm.
- However, the proposed amendments impose broad and arbitrary restrictions on individuals who are already subject to rigorous licensing, monitoring, and safekeeping requirements, without evidence that such measures are necessary, effective, or proportionate. In doing so, the Bill risks undermining public confidence in firearms regulation and unfairly impacting compliant, law-abiding ACT Citizens.
- The NSW legislation has already seen an increase in firearms licence applications and collectors' licence applications. The same number of firearms will exist just they will be owned by more people, similarly this was seen after the WA legislation was introduced.

2. Consultation and Evidence Base

- The Explanatory Statement indicates consultation was conducted with ACT Policing and Justice and Community Safety Directorate. There is no indication that firearms dealers, sporting organisations, primary producers, hunting groups, or representative bodies of licensed firearm owners were consulted.
- For legislation that directly affects lawful property ownership and legitimate recreational, sporting, and occupational activities, the absence of broader consultation is

significant. Meaningful engagement with affected stakeholders is essential to ensure legislation is workable, proportionate, and based on operational reality.

3. Firearm Ownership in the ACT

- ACT Government data indicates there are approximately 22,000 firearms owned by around 7,000 licensed users, averaging approximately three firearms per licensee. Approximately:

- 5.7% of licensees own more than 10 firearms (there is no indication of how many are collectors already and exempt)
- 20% own more than 5 firearms

These figures, without evidence of harm or misuse, do not justify imposing numerical possession limits. Statistical ownership data alone does not demonstrate risk; risk arises from access by unfit persons, not from the quantity of lawfully owned firearms.

4. Human Rights and Proportionality

- The ACT Human Rights Act requires that any limitation on rights be:
 - **Necessary**
 - **Proportionate**
 - **Rationally connected to a legitimate objective**
 - **The least restrictive means available**

The proposed firearm limits fail these criteria:

- No evidence is presented that lawful firearm numbers correlate with public safety risk.
- The measures apply indiscriminately, regardless of firearm type, purpose, value, or storage arrangements. For example, air-rifles and black powder muzzle loaders are comparatively compared to cartridge operated firearms.
- Less restrictive and more effective options—such as licensing system reform, intelligence sharing, and compliance enforcement—are available but unaddressed.

One firearm in the hands of an unfit person is one too many; conversely, multiple firearms in the hands of a fit and proper person do not present a demonstrated risk.

This legislation does though impact licenced shooters who participate in numerous target shooting activities and hunting activities for which different firearms are used and with good purpose.

5. Misapplication of Interstate Models

The proposed limits appear to be derived from Western Australian legislation. That model is unsuitable for the ACT due to substantially different circumstances, including:

- Lack of public land hunting in WA
- Different firearms use permissions
- Limited recognition of dual-purpose firearms

WA's framework has resulted in outcomes such as requiring separate firearms of identical calibres and type being used for different purposes (target/hunting), despite no functional difference. Adopting this model in the ACT provides no safety benefit.

6. Legitimate Firearm Use and Humane Animal Control

Firearm calibre selection is critical to humane animal control and is dictated by law and national codes of practice.

Examples include:

- Kangaroo and wallaby management requiring centrefire calibres, alongside lower-calibre firearms for humane euthanasia of juveniles.
- Deer hunting regulations in NSW and Victoria mandating minimum calibres ranging from .243 to .270 depending on species.
- Pest control around farm infrastructure requiring lower-powered firearms to ensure safety and minimise ricochet risk.
- High velocity smaller calibre projectiles are far more frangible and present lesser risk of ricochet or bullet travel after impacting an animal ensuring safety.

These requirements necessitate access to multiple firearms of different calibres. Larger calibres are not interchangeable solutions and may cause unnecessary animal suffering, increased noise and complaints, or increase the risk of potential property damage. Mechanical reliability also necessitates redundancy to ensure humane outcomes.

7. Impact of Arbitrary Firearm Limits

Under the proposed limits:

- Heirloom and historical firearms may be surrendered and destroyed despite posing no increased risk
- Left-handed shooters are disadvantaged due to firearm design constraints
- Firearm owners may be forced to replace multifunction firearms with multiple single-purpose firearms, increasing rather than reducing total firearm numbers
- Lawful sporting target shooting, recreational, occupational, and family-shared use is disrupted

- Australia's representation in International and National shooting events will be impacted.

These outcomes are inconsistent with fairness, proportionality, and effective regulation.

8. Safekeeping, Theft Prevention, and Risk

The Bill suggests firearm number limits will reduce theft risk. However:

- Theft risk is addressed through existing safekeeping requirements
- High-value firearms already incentivise owners to exceed minimum security standards
- Other jurisdictions have successfully scaled security requirements (e.g. alarms) based on risk rather than imposing blanket ownership caps

There is no evidence that firearm theft correlates with the number of firearms owned rather than with storage compliance.

9. Licensing Failures Versus Lawful Ownership

- Recent high-profile criminal incidents in other jurisdictions arose from systemic failures in licensing processes, not from lawful firearm ownership practices.
- The Chief Police Officer in media reporting has highlighted that the use of illicit firearms is the public safety problem.
- The ACT Firearms Registry remains paper-based. The absence of a functional National Firearms Register undermines intelligence sharing and threat identification across jurisdictions. Investment in modern licensing systems would deliver far greater public safety outcomes than buyback schemes or arbitrary ownership limits.

10. Support for Targeted Public Safety Measures

I support:

- Firearm Prohibition Orders, with appropriate court oversight
- Controls addressing illicit firearm possession
- Regulation of firearm blueprints used for 3D printing

These measures are targeted, evidence-based, and directly address criminal misuse.

11. Specific Legislative Concerns

Straight-Pull Rimfire Rifles

- Have existed since before 1900
- Are used in Olympic biathlon and legitimate sporting contexts
- In Olympic biathlon they must be used to be competitive

- Should remain Category A, with the 10-round limit or, if deemed necessary, Category B

Straight-Pull Centrefire Rifles

- Have existed since before 1900
- Are currently Category B and function equivalently to bolt-action rifles.
- Modular modern straight pull designs reduce the need for multiple firearms as they are multi-calibre capable and can be used by both left and right-hand shooters, reducing the need for multiple rifles.
- Categorisation to C would increase firearm numbers if users replace a single multi-calibre straight pull rifle.
- Should remain Category B with a 10-round magazine limit

Straight-Pull / Button or Lever Release Shotguns

- Should be moved to Category B with a 5-round magazine limit.
- There are genuine reasons for shotguns with greater than 2 round magazine limits to be used which relate to humane animal control.

Section 15 – Rimfire Definitions

- Fixed tubular magazine rimfire rifles with greater than 10 round magazine exist but are reloaded one round at a time.
- Section 15 should be amended to focus on **removable magazine capacity of 10-rounds**, not fixed tubular capacity.

12. Recommendations

1. Do not proceed with blanket 5 and 10 firearm possession limits.
2. Ensure firearm legislation complies with human rights and proportionality principles.
3. Invest in digitisation of the ACT Firearms Registry and participation in the National Firearms Register. Not invest in a proposed firearm Buyback.
4. Retain straight-pull rimfire rifles as Category A or B.
5. Retain straight-pull centrefire rifles as Category B with a 10-round magazine limit.
6. Move straight pull / lever or button release shotguns to Category B with a 5-round magazine limit.
7. Amend Section 15 to appropriately classify fixed tubular magazine rimfire rifles.
8. Focus regulatory effort on illicit firearms, licensing integrity, and targeted enforcement.

Conclusion

- The ACT does not have a public safety problem arising from lawful firearm ownership. The proposed Firearms Amendment Bill imposes unnecessary and

disproportionate restrictions on compliant citizens while failing to address the systemic issues that genuinely impact community safety

- Effective firearm regulation must be evidence-based, proportionate, consultative, and directed toward real risk. This Bill, as currently drafted, does not meet that standard.

I would be happy to further discuss with the Inquiry.

Thank you