



Submission cover sheet

Inquiry into Legislation on proposed firearms reform

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Submission to the

ACT Legislative Assembly

Standing Committee on Legal Affairs

Inquiry into the Firearms (Public Safety) Amendment Bill 2026

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Opening Statement.

*Like many firearms licence holders, I have no issue with the strengthening of firearms legislation, **IF** the changes actually address a problem and make sense. Many of the proposed changes **make the assumption** that an individual **cannot or does not have multiple genuine reasons** for the possession and use of firearms.*

*The main issue surrounding the tragic event at Bondi in December remain to be with the licencing process and lack of resources within government departments to effectively execute the intent of the existing firearms legislation to ensure that licence holders are a **fit and proper person**. This was a terrorist attack committed by two individuals filled with hate, not by the other 900,000 odd licence holders.*

The proposed amendments are more likely to see the existing number of firearms dispersed over a larger number of licence holders as new applications increase placing further burden on already strained government departments responsible for regulating the industry.

In my own circumstance, I have no interest in collecting, hoarding or stockpiling firearms, if a firearm is not being used any longer and serves no purpose, it is sold and removed from my licence. Everything that I retain, much like a tool, has its own application and practicality for the task at hand.

1. Executive Summary

This submission addresses the proposed introduction of quantitative firearm limits under new section 52A of the Bill, particularly the proposed cap of **10 firearms for licensees engaged in business/employment or vertebrate pest animal control, or Sporting Shooting.**

The submission identifies a policy inconsistency:

- Professional shooters are entrusted by government authorities to carry and discharge firearms in **sensitive public environments**, including major public precincts and nationally significant sites, with the appropriate permitting.
- Yet the Bill implies that such individuals should ordinarily be restricted to **no more than 10 firearms**, unless special approval is granted, and without clear indication to the approval process or guarantee of the approval transferring through change of position of the registrar or deputy registrar.
- Limits have been set for sporting shooters without proper consultation or understanding of the variance of needs within the sport, and again with no clear indication to the approval process to “the number of firearms approved by the registrar”

This submission does **not oppose regulatory oversight**. Instead, it recommends that the Committee refine section 52A to ensure:

- Regulation is **risk-based rather than arbitrary**,
- Professional pest controllers are regulated through **criteria-based approval mechanisms**, and
- Public safety objectives are strengthened through **enhanced storage, transport, business documentation and audit controls**, rather than blunt numerical caps.
- Sporting shooters needing a higher number of firearms for competition be considered by application for increased cap limits on a case by case basis after providing supporting documentation.

2. Background and Context

The Bill inserts new section 52A, which:

- Limits possession to **10 firearms** where the licensee’s genuine reason relates to business/employment or vertebrate pest animal control, or sport or target shooting.
- Limits possession to **5 firearms** in other cases.
- Allows for a higher number if approved by the registrar under regulation.

The Explanatory Statement describes the purpose as enhancing public safety by introducing quantitative limits and reducing risk of misuse or diversion.

However, the government operating in the ACT routinely engage **professional shooters** to conduct pest mitigation programs in:

- Urban and peri-urban environments,
- Open public spaces,
- Public monuments and nationally significant precincts.

Public reporting has confirmed rabbit control operations in the Parliamentary Triangle and near Parliament House conducted by professional contractors.

This establishes an important public policy fact:

The ACT and Commonwealth governments already assess that properly vetted and contracted professional shooters can safely operate in highly sensitive public environments.

In regard to sporting shooters, clubs and disciplines already self-regulate and monitor the suitability and genuineness of its members.

3. Key Issue: Arbitrary Caps vs Demonstrated Risk Management

The proposed “10 firearm” cap for occupational and pest-control licensees as well as sporting/competition shooters is not clearly connected to demonstrable risk factors.

Risk is more closely correlated with:

- The suitability and background of the individual,
- Secure storage and transport arrangements,
- Audit and inventory control mechanisms,
- Compliance oversight,
- Nature and location of deployment.

A numeric ceiling does not directly regulate any of these core risk determinants.

Further, professional pest controllers may require:

- Multiple firearms suited to different species and environments,
- Firearms configured differently for safety and operational requirements,
- Redundancy to ensure safe and continuous operations under government contract.

A fixed number (10) does not inherently reflect operational complexity or risk exposure.

4. Recommendations

Recommendation 1

Retain regulatory oversight of occupational/pest control firearm numbers, but replace the hard “10 firearm” ceiling with a **criteria-based approval framework**.

Recommendation 2

If a default cap is retained, create a **statutory presumption of approval above 10** for professional pest controllers who meet defined regulatory criteria.

Recommendation 3

Strengthen public safety outcomes by prescribing enhanced requirements for:

- Secure storage,
- Vehicle security,
- Inventory control and serialised registers,

- Immediate reporting obligations,
 - Periodic compliance audits.
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5. Proposed Drafting Amendments

Below is suggested drafting to refine section 52A while preserving the Bill's structure.

Option A (Preferred): Replace Fixed "10" Cap for Occupational/Pest Control

Proposed amendment to section 52A(1)(a)

Current structure (simplified):

not more than 10 firearms (or higher number approved by registrar)

Suggested replacement wording:

(a) if the person possesses or uses firearms for a relevant genuine reason—

(i) the number approved by the registrar in accordance with prescribed criteria; or

(ii) if no approval is granted, not more than 10 firearms;

This maintains administrative control but shifts the emphasis from an arbitrary cap to registrar-based determination guided by objective criteria.

Option B: Retain "10" but Create Statutory Presumption

Insert new subsection:

(1A) In considering an application under subsection (1)(a) for approval to possess more than 10 firearms, the registrar must grant approval if satisfied that—

(a) the applicant is engaged in vertebrate pest animal control or business/employment requiring firearms; and

(b) the number sought is reasonably necessary for operational or sporting competition requirements; and

(c) the applicant complies with prescribed enhanced storage, transport and record-keeping requirements.

This creates clarity and avoids discretionary uncertainty.

6. Suggested Regulation-Making Criteria

To strengthen safety outcomes, regulations could prescribe:

1. Operational Necessity Criteria

- Evidence of contracts or work orders,
- Species/task diversity requiring different firearm types,
- Geographic spread of operations.
- Sporting shooting discipline specific needs

2. Enhanced Storage Requirements

- Commercial-grade safes,
- Alarm systems,
- Restricted access controls,
- Separate storage of bolts or critical components (where applicable).

3. Transport Controls

- Locked containers,
- Vehicle immobilisation systems,
- No overnight storage in unattended vehicles (except under prescribed secure conditions).

4. Inventory and Audit Controls

- Serialised firearm register,
- Annual declaration to registrar,
- Mandatory audit upon request,
- Immediate reporting of loss, theft, or damage.

5. Training and Accreditation

- Current professional pest control accreditation,
- Firearms safety recertification at prescribed intervals.

7. Public Safety Rationale

This approach:

- Maintains strong oversight,
- Targets diversion and misuse risks directly,
- Aligns law with actual government reliance on professional shooters,
- Avoids arbitrary limits that may undermine legitimate pest mitigation capacity.
- Doesn't penalise legitimate sporting/competition shooters.

The Committee is encouraged to ensure that regulatory mechanisms are **risk-responsive and evidence-based**, rather than numerically symbolic.

8. Conclusion

The Bill's objective of enhancing public safety is supported.

However, section 52A should be refined to:

- Remove or qualify the arbitrary "10 firearm" occupational cap,
- Introduce objective approval criteria,
- Strengthen storage and audit safeguards.

A targeted regulatory approach will better protect the community while maintaining essential pest mitigation capability in the ACT.

Closing Statement,

Firearms are a daily part of my life. Being a **Farm Manager** in my day job, alongside my wife, we have a contractual agreement with the government to manage pest animals as well as an obligation for animal welfare and a responsibility in caring for the land to manage over abundant wildlife.

I am a business partner in a **vertebrate pest animal control** business that generates a much-needed extra income in a world with an ever-increasing cost of living. The business operates in a variety of settings such as, but not limited to, inside shopping centres, roof tops of commercial buildings, ground works in built-up retail districts, urban and peri-urban areas, golf courses, parks and recreational areas, zoos, schools, swimming pools and rural landholds. The business has been servicing ACT government contracts as well as many NSW council precincts for many years with zero incidents or negative interactions with members of the general public. We are also at times engaged by veterinary businesses to perform euthanasia where circumstances require the use of firearms.

As a **recreational hunter**, a large portion of my family's protein is sourced from an underutilised resource of game (non-native) animals.

I have been a **Sporting Shooter** for approximately 10 years and focused on the discipline of Combined Services which is the second biggest discipline within the Sporting Shooters Association of Australia. I am a 5-time State Champion, 2-time National Champion and 2-time runner-up National Champion in pistol and have won multiple other Gold, Silver & Bronze Medals in both pistol and rifle events at State and National level. I have also been invited to compete in New Zealand in October 2026 in an International Service Rifle competition. My wife is also a sporting shooter, and our eldest daughter was thrilled to be able to join us in the sport 18 months ago. We have two other daughters eagerly waiting to be old enough to join as well.

All of the firearms in our possession have very specific uses relating to all of the above. Much the same way that a person would adjust the seat and mirrors of a car to suit their body type and structure, firearms are predominantly set up to an individual's needs. You cannot necessarily pick up another person's firearm and expect to be able to manipulate the controls in the same fashion or line up on the sights/optics in the same way which influences accuracy and a flow on effect to safety.

When competing at national events, I use 9 to 12 different firearms for the various categories and events. To shoot every class of firearm in Combined Services Discipline, 19 different firearms would be required. These firearms would rarely meet up to requirements for other disciplines should additional competitions be considered. The majority of these firearms are of either of a weight or calibre that my wife is not comfortable with, so she has her own. There are then a minimum of 4 other firearms that are used for my 13yo daughter to compete with, being of quite smaller stature and strength than myself or my wife, the firearms we compete with would in no way be suitable for her to use. Minor's cannot own their own firearms so these have to be registered on an adult licence.

For our requirements around the farm, varying calibre's are required dependant on the target species, topography, level of infrastructure where the pest animals are located and proximity to livestock and maintaining an ethical and humane dispatch of the animal.

For professional shooting, numerous firearms are required with a large variance in calibre and power factors dependant on the target species, topography, environmental conditions and location, comfort of the general public and maintaining an ethical and humane dispatch of the animal. I would not take an air rifle to shoot a deer at 300m in an open paddock any more than I would use a .308 calibre to shoot a pigeon inside a shopping centre. The services undertaken by my business reduce loss of revenue from damaged crops, protect ecologically and environmentally sensitive areas and also reduce the costs of repair and remediation works caused by pest animals that then become a burden to every tax payer. Some pest animals controlled also pose substantial health risks to humans and livestock.

There seems to be an overwhelming lack of understanding that one firearm cannot suit all applications and situations. The firearms that are used for competition are not always practical, ethical or necessarily legal for use in primary production, professional shooting or hunting. And in reverse, the firearms used for primary production, professional shooting and hunting do not meet the criteria for discipline specific competition, with the exception of maybe 2 of my firearms that could be used for both applications. The firearms currently in our possession are also subject to the genuine reasons prescribed under the legislation and can only be used for the reason they were acquired for under their registration (e.g. handguns can only be used for sport and target shooting, not recreational hunting or vertebrate pest animal control).

While my business has the legal right to obtain a composite entity licence which will have no cap limits, under the legislation those firearms can only be used for the purposes of the business, not competition, recreational hunting or primary production.

The sad reality for my circumstances is that should these laws be passed as they are, my focus will need to remain with my ability to undertake my duties in my day job and as a professional shooter running my own business. Even with two adults in the same household, we would struggle to retain enough appropriate firearms under the proposed caps to complete these duties and result in a diminished capacity to operate effectively and/or humanely resulting in a substantial loss of income. With the focus needing to be on this, would mean that our sporting careers would then be over which is a large part of what our family does together to spend time outside of our hectic work lives.

As a firearms licence holder, I am already held to a higher standard than the rest of the population. There are a number of offences that would preclude someone from obtaining a licence or retain one. Genuine firearms licence holders walk a very straight line as we do not want to jeopardise our ability to participate in our chosen sport or profession. So much more harm and potential risk is posed to human life every year in vehicle accidents as a result of the driver being under the influence of drugs and alcohol or not being competent or proficient at the task than there is by the number of firearms licence holders or registered firearms, yet they get a slap on the wrist, pay a fine and keep their licence. Genuine firearms licence holders are always conscious of the fact that their actions or decisions could affect the outcome of being able to continue doing what they love to do.