



Submission cover sheet

Inquiry into Legislation on proposed firearms reform

Submission number: 025

Submitter: Canberra Rifle Club

Date authorised for publication: 11 March 2026

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Including Bungendore RC Inc)



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27th February 2026

ACT Government
Standing Committee on Legal Affairs,
ACT Legislative Assembly,
GPO Box 1020,
Canberra ACT 2601

By email: LACommitteeLegal@parliament.act.gov.au

ACTFBTR Submission – Firearms (Public Safety) Amendment Bill 2026 – ACT

Introduction

ACT Full Bore Target Rifle (ACTFBTR) including Canberra Rifle Club Inc (CRC) and Bungendore Rifle Club Inc (BRC), welcomes the opportunity to contribute comments to the Standing Committee on Legal Affairs.

ACTFBTR is the peak body of long-range Fullbore target rifle shooting in ACT and is a Member organisation of National Rifle Association of Australia Limited (NRAA). Biathlon Australia is an affiliate of NRAA.

ACTFBTR represents nearly 200 target shooting members who are individual members of Canberra Rifle Club Inc and Bungendore Rifle Club Inc which operate on the McIntosh Rifle Range in Majura.

ACTFBTR members participate only in competitive target rifle shooting activities on the Police-approved and Defence-approved McIntosh rifle range. A range of rimfire and centrefire firearms are used across the many different sporting disciplines that are controlled under the NRAA governance of the sport. All activities must comply with relevant firearms laws and the safe control required under the NRAA Standard Shooting Rules (SSR) [SSR PART 1-7 All Chap v2.0 Jan 26](#)

Individual members compete at different levels from club, to district, state, national and international level. ACT members have a remarkable record in international competitions:

- in 2023 the Australian team (including an ACT member) **won the bronze medal** in the F-Class Teams World Championships.
- In 2024 the Australian team included three ACT members which **won the Target Rifle Teams World Championships for the second consecutive time.**



- Also, in 2024 two ACT members were in the **Veterans (over 60) World Championship winning team.**
- An ACT member competed in the Australian Under 25 team at the 2024 World Championships.
- **Seven ACT team members have been selected** to compete in the NRAA Australian Target Rifle team at Bisley UK in July 2026.
- **Three ACT members have been selected** to compete in the F-Class World Championships in August 2026.
- **Five ACT members will compete in Australian Teams** in the international matches in Brisbane in October 2026.

Biathlon, PSR and Sporter disciplines and straight pull rifles

Canberra Rifle Club member, Darcie Morton, has just been competing in Italy in the Australian Winter Olympic team. [News - Biathlon Australia Limited](https://www.biathlonaustralia.com.au/news/darcie-morton-selected-for-winter-olympic-debut)
[https://www.biathlonaustralia.com.au/news/darcie-morton-selected-for-winter-olympic-debut.](https://www.biathlonaustralia.com.au/news/darcie-morton-selected-for-winter-olympic-debut)

Straight pull rimfire rifles are used by biathlon members and straight pull centrefire rifles are also used by members competing in Precision Service Rifle (PSR) and Sporter disciplines under NRAA rules. Competitions and training occur both domestically and internationally. There are 18 members of Canberra Rifle Club training and competing in Biathlon shooting activities on the McIntosh Rifle Range.

In addition to Darcie Morton, another Canberra Rifle Club member Taryn Dickens is currently vying for a spot on the Australian Winter Paralympics team. [Taryn Dickens - Paralympics Australia](#). Canberra Rifle Club also has a strong membership following in PSR and Sporter disciplines.

Inconsistent and rushed legislation

ACTFBTR pays respects to the victims of the Bondi terrorist attack, their families, and everyone affected. ACTFBTR condemns this violence in the strongest possible terms. There is no place for terrorism, antisemitism, or any form of hatred in Australia. However, the rushed NSW and Federal legislation impacting on law abiding licensed firearms owners do not deal with the root cause of the Bondi terrorist attack, being a government failure to act on intelligence information on individuals with extremist ideologies. Unfortunately, the proposed ACT Firearms Amendment Bill also does not address this issue.

NRAA and Biathlon Australia have strongly objected to the changes to NSW laws and Federal regulations which change the category of straight pull rifles to prohibited category C. NRAA has made submissions to Victoria on this matter as well. Queensland government has sensibly NOT proposed to change the category of straight pull rifles, which allows Queensland competitive biathlon, PSR and Sporter discipline athletes to continue to practice and compete.

Competition straight pull rifles are not shotguns or handguns. So, by definition the owners are not “certified sports shooters” or “certified international sports shooters” under the Prohibited Imports Regs. Accordingly, the Minister cannot give permission to biathletes and



NRAA competitors to import straight pull Rifles under the Sports Shooters Test or International Sports Shooters Test. This is a Federal government oversight that also needs to be corrected.

So, under proposed new laws these tests will be of no use to Australian or international biathletes and NRAA competitors. What will the 18 current biathlon members of the Canberra Rifle Club, some who are winter Olympians, do if their sporting equipment is categorised as prohibited simply because of an unintended consequence of the Firearms law changes?

Whilst it is comforting that the proposed Firearms (Public Safety) Amendment Bill 2026 (“the Bill”) delivers on the ACT Government’s commitment to stronger laws to improve public safety, its placement ahead of the Bondi Royal Commission findings being available, other state regulations being finalised, and the renegotiated National Firearms Register (NFR) being finalised delivers challenges for our sport and members. ACTFBTR notes the comment in the Explanatory Notes that the Bill “...measures are intended to reduce the capacity for harm caused by the misuse or diversion of firearms to illicit markets and will prevent the proliferation of untraceable and illegal weapons that threaten the security of the ACT community.”

ACTFBTR members are law abiding firearms users and owners who comply with the strict responsibilities of firearms usage and ownership. ACTFBTR sporting activities are carried out with strict adherence to the applicable laws and are also governed by the NRAA safe system of control on approved rifle ranges as laid out in the SSR.

As a competitive target shooting organisation, ACTFBTR has focused its comments on elements of the Bill related to firearms, particularly those used by our ACT members. ACTFBTR acknowledges the NRAA and Shooting Industry Foundation of Australia (SIFA) as an industry leader and national sport shooting organisation convenor and thanks them for providing information which has been used in this ACTFBTR response.

1. Limitation on number of firearms possessed or used by licensees

ACTFBTR considers that there should be no numerical limits on the number of firearms a licensed individual may own. A rigid numerical cap fails to reflect the diversity of legitimate firearm use in Australia. Licensed individuals commonly participate across multiple categories and disciplines, including sport target shooting with ACTFBTR, hunting, pest management, and primary production, often concurrently.

Any fixed numerical cap which has the effect of constraining the level and variety of participation in the shooting sports would conflict with the ACT sport participation policy “CBR Next Move 2023-2028” and “Get Active” which include Biathlon and Rifle Shooting through the Canberra Rifle Club [Find a sport/recreation organisation - Sport and Recreation](#).

ACTFBTR Target Shooting Rifle Competitors

ACTFBTR members frequently require multiple firearms to participate safely and competitively across the different NRAA disciplines. NRAA has 16 different rifle disciplines,



and it is feasible that ACT members would require and own more than one rifle in each discipline to the pursue the sport competitively.

Practical examples include:

- NRAA rimfire disciplines require, at a minimum, four distinct rimfire configurations to participate fully across disciplines such as Field Class, Short Range Benchrest, Long Range Rimfire and Biathlon.
- NRAA centrefire disciplines are highly diversified, with several disciplines governed by international bodies such as ICFRA and ISSF. ICFRA alone has three distinct divisions, each requiring different rifle specifications. This is in addition to other popular Australian formats including F-Standard, Match Rifle, Sporter Class Production, Sporter Class Open, Service Rifle, Long Range Black Powder, 600y and 1000y Global Benchrest and Precision Service Rifle.

A committed target shooting rifle competitor may legitimately require ten or more rifles just to participate across disciplines in the NRAA rules alone.

Recommendation:

There is no reason to impose arbitrary limits on legitimate law-abiding licensed sports target shooters. There needs to be an exemption on limits for such a genuine reason. The focus of ACT Government should instead be on limiting access to firearms for individuals who pose a significant threat due to association with extremist ideologies or violent histories.

Existing Regulatory Safeguards

Importantly, robust controls on firearm acquisition already exist through the Permit to Acquire (PTA) process. Each application is individually assessed against a genuine reason and genuine need test, ensuring that every firearm acquired is justified by lawful use. Provided this process functions as intended and appropriate safe storage requirements are met, it represents the most logical and proportionate regulatory mechanism.

Risks such as theft or community concern are better addressed through targeted measures, including safe storage compliance and configuration-based assessment, rather than blunt numerical limits driven by alarmist narratives around so-called private arsenals.

There is no credible evidence to suggest that imposing a numerical cap on the number of firearms held by licensed individuals would strengthen community safety in ACT.

Available evidence does not demonstrate a causal relationship between the quantity of firearms lawfully held by a licensed person and an increased risk of violent crime. Similarly, there is no evidence that higher lawful firearm ownership correlates with increased rates of theft, particularly where existing safe storage requirements are met and enforced.

Community safety outcomes are more effectively addressed through the consistent and rigorous enforcement of existing regulatory mechanisms. These include the genuine reason and genuine need tests applied through the PTA process, ongoing licence eligibility assessments, and compliance with safe storage standards. These measures already provide



a tailored, risk-based framework that assesses each firearm on its merits rather than relying on arbitrary numerical thresholds.

A numerical cap risks diverting regulatory focus away from these proven controls and towards a blunt measure that does not meaningfully target risk. Resources would be better directed towards improved compliance auditing, intelligence-led enforcement, and education around responsible storage and handling, all of which have a demonstrable and direct connection to community safety.

In this context, strengthening enforcement of existing laws is a more proportionate, evidence-based approach than introducing numerical limits that lack a clear safety rationale.

2. Licence categories and authority conferred

The underlying principle of ACT's firearms categorisation framework remains fundamentally sound. Categorising lawful firearms according to objective, measurable characteristics such as ammunition type (for example rimfire versus centrefire), magazine capacity, and action or actuation type (for example bolt action versus break action) provides a rational and risk-based approach to regulation.

These characteristics directly relate to functional capability and are therefore appropriate proxies for risk. When applied consistently, they enable firearms to be assessed and classified in a predictable and enforceable manner, supporting both community safety and lawful firearms use. However, the effectiveness of the framework is undermined where subjective considerations are introduced.

A fit-for-purpose categorisation system must therefore remain grounded in objective, technical criteria that can be applied consistently and withstand changes in context or administration.

The treatment of straight pull rifles provides a clear example of the risks of departing from this principle. Straight pull rifles remain manually operated bolt-action firearms, differing only in the direction of bolt travel rather than in rate of fire or lethality. There is negligible real-world difference in cycling speed or operational capability compared to conventional bolt-action rifles. Classifying such firearms more restrictively based on linear bolt movement rather than functional performance undermines the credibility and consistency of the framework.

Furthermore, categorising these rifles as prohibited Category C impacts directly on a cohort of dedicated biathlon athletes, many of whom compete overseas and in the winter Olympics. As mentioned earlier, a Canberra Rifle Club member, Darcie Morton, has just competed in the Australian Winter Olympic team. [News - Biathlon Australia Limited](#).

Canberra Rifle Club also has a strong following in the Precision Service Rifle (PSR) discipline, with athletes who have represented Australia in NRAA teams in recent years. This team regularly travels to the UK competing in international Civilian Service Rifle (CSR) matches, where straight pull rifles are perfectly legal and commonly used in competitions.



Recommendation:

Exemptions from the ACT Firearms Act in Schedule 2 for biathlon are currently in place for imitation firearms but if the change to category C firearms is to be unnecessarily enforced, then exemptions need to be expanded to include Target Shooting licence holders with the genuine reason of target shooting as per Table 61 of the Act. This should apply equally to both rimfire and centrefire straight pull rifles so as not to discriminate against lawful licensed competitors.

3. Unlawful possession of digital blueprint for manufacture of firearms or firearm parts

NRAA supports that the Bill introduces offences that prohibit the possession of blueprint material for the manufacture of 3D printed firearms or firearms parts.

It is important however, to exclude innocuous accessories designed for the simple protection of firearms parts. Such items may include telescope tube caps (to prevent ingress of dust onto expensive lenses), rear sight knob caps (to aid in allowing for wind zeroing offsets), front sight caps (to protect lenses from dust and rain), front sight extension tubes (to insert and protect lenses and sighting rings), bolt protection tubes (for protection from physical damage), bullet boxes (to safely hold and separate groups of individual cartridges), bullet handloading trays, etc.

Recommendation:

These accessory items play no active role in the operation or firing of a firearm. It is necessary to define this distinction so that law abiding licensed members are not inadvertently charged.

ACTFBTR would welcome requests for further information or discussions on aspects of the above.

Yours faithfully

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Captain of Canberra Rifle Club Inc