



Submission cover sheet

Inquiry into Legislation on proposed firearms reform

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Submitter: NSW Farmers

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Standing Committee on Legal Affairs
ACT Legislative Assembly
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RE: Submission to Inquiry into Firearms (Public Safety) Amendment Bill 2026

NSW Farmers welcomes the opportunity to provide a submission to the ACT Parliament's Standing Committee on Legal Affairs' inquiry into the Firearms (Public Safety) Amendment Bill 2026 and Firearms (Firearm Prohibition Orders) Amendment Bill 2026.

NSW Farmers represents primary producer members across NSW and the ACT and is Australia's largest state farming organisation. We advocate for issues such as the environment, biosecurity, water, animal welfare, economics, trade, workforce, and rural affairs. Agriculture is crucial, employing more than 75,000 people in NSW and the ACT, and contributing more than \$24 billion to the economy.

NSW Farmer acknowledges the extreme sensitivity of this issue and the significant atrocity that occurred in Bondi on the 14 December. Noting the decisions agreed by National Cabinet to strengthen gun laws, legitimate agricultural use must not be unfairly targeted by these reforms as firearms are critical tools of trade for farming and continued access is vital.

Importantly, implementation of these changes must be sensible, ensuring that they support community safety without placing unnecessary regulatory burdens on responsible farmers who depend on firearms to do their jobs. This extends to other licence holders involved in agriculture that support essential pest management and biosecurity. NSW Farmers has considerable concerns that the National Gun Buyback design may not be fit-for-purpose and will unfairly penalise farmers required to surrender firearms to meet new requirements. Specific feedback is attached to this letter.

NSW Farmers understands that consultation with farmers on the proposed changes to ACT firearms legislation prior to the Bill's introduction was minimal. Amendments to the subsequent regulation should not be rushed to ensure that farmer perspectives are included within this process to mitigate unintended consequences for food and fibre production, and support feasibility of the reforms. This could occur through involvement in a stakeholder committee with primary production representation, to inform the government's firearms policy and regulation.

I recognise that the ACT Government seeks to increase visibility of firearm ownership across the territory, but I caution that changes to these laws must recognise the vital importance of firearms as an essential tool of trade for farm safety and risk management. Should you require further information or wish to discuss this further, please contact Policy Director – Socio Economics Elen Welch

Yours sincerely

Xavier Martin
President

NSW Farmers position - Firearms (Public Safety) Amendment Bill 2026 [ACT]

Restricting the number of firearms individuals can own

Limit of five firearms for licence holders, with exemptions allowing up to 10 firearms for genuine occupational or sporting purposes.

- NSW Farmers does not support a cap of 10 firearms for primary producers. Farmers work in varying environments and require firearms to ensure personal safety, undertake animal management and importantly be on the frontline of pest, biosecurity and environmental management.
- Farmers are reporting increased feral and invasive pest number across the landscape, particularly feral pigs, foxes, wild dogs and deer. The proposed caps may reduce the ability to effectively manage and eradicate these pests that pose an unacceptable risk to food production. These pests carry unacceptable biosecurity risks that will devastate food production and safety for Australians.
- Farm operations range significantly in use-case of firearms including size, commodity, operating environment, and pest pressures. There will be farmers that have genuine reasons for requiring more than 10 firearms and there must be a feasible and reliable pathway to apply for additional firearms based on primary production requirements, for example with commissioner approval.
- Caps on the number of firearms per individual must be cumulative based on Genuine Reasons attached to the licence as was implemented in Western Australia – without this concession there will be impacts to legitimate use of firearms (e.g. primary production and sports/target shooting).
- NSW Farmers does not support the current approach in NSW that enforces a cap on licence holders with more than one genuine reason where they are limited by the highest single cap (not cumulative).

Recategorising the types of firearms that can be possessed and used

Introduce limits on magazine capacity and rapid-fire weapons.

- NSW Farmers cautions any restrictions on the types of firearms that primary producers can access including where this occurs through recategorization.
- If firearms required by license holders involved in agriculture are re-categorised to higher categories, this must be accompanied by a clear and well-communicated transition including appropriate timelines.
- Existing ownership caps for higher categories must be adapted where there is significant re-categorisations (i.e. to Category C), to ensure that this doesn't restrict farmers from the tools needed to do their jobs. For example, Schedule 3 of the Firearms Act 1996 currently limits possession to two firearms only (one registered self-loading rim-fire rifle with magazine capacity of not more than 10 rounds; and one registered shotgun to which licence applies)
- Adequate time and opportunity for license holders to apply for the higher category licenses including commensurate resourcing for application processing is essential to ensure that delays do not restrict farmers from having the right tools to do their job.

Gun Buyback Scheme

- Whilst NSW Farmers does not support the need for a buyback, if farmers are required to surrender firearms to meet new state or territory-based requirements, there must be fair compensation available including ammunition, accessories and parts that's use is related to those firearms.
- This must be based on fair market value prior to 14 December 2025 due to the market distortions which have subsequently occurred.
- Equally, the design of the buyback must not be rushed and be informed by robust consultation with affected stakeholders including farmers. This is vital to ensure that law abiding farmers who own firearms have clarity and are not unfairly penalised or faced with financial hardship as a result of the changes.
- NSW Farmers does not support the buyback valuation model used recently in Western Australia and considers this would cause unfair financial hardship for impacted licence holders.

Rationale – Buyback model

- Market value is critical as individuals and businesses in agriculture made considerable investments in tools to do their jobs. New costs of typical firearms setups used by producers shared with NSW Farmers typically range from \$2000 - \$10 000.
- You must have a genuine reason to own ammunition – if you no longer own a firearm capable of using that ammunition (because you've surrendered it) you run the risk of being in breach of the law in many jurisdictions. Many farmers will purchase ammunition in bulk as they will need to travel to some distance to purchase it. Firearms, parts and accessories are costly, and farmers will make business investment decisions for these tools of trade with a focus on cost effectiveness longevity.
- Inclusion of parts, accessories and ammunition is particularly important for fairness, particularly with the cost of parts having risen to now often be worth more than the firearm itself (e.g. thermal scopes). To support use in line with their business needs and genuine reason, many involved in agriculture have invested considerably in accessories to optimise setups and enhance precision.
- It is also common for farmers to have multiple firearms setups in the same calibre, one set up for daylight (with conventional scope) and another set up for low light/night (with a thermal sight) e.g. pigs, dogs, deer, foxes, feral cats. Farmers have made decisions to invest in multiple setups to improve efficiencies/optimisation of use to minimise issues/practicalities with reconfiguring on a daily basis which can impact accuracy.
- Law enforcement has repeatedly raised concerns over ammunition and some parts that are not easily machinable (either through traditional modes or 3d-printing), such as trigger mechanisms and barrels, being of particularly high value for criminal organisations since they're both crucial for use and difficult to acquire illegally. Not including them in the buyback is a public safety risk due to potential diversion to non-licensed owners (e.g. criminal groups).
- We expect that most individuals who utilise the buyback for ammunition will do so for more niche ammunition types which are generally held in smaller quantities, rather than for common ammunition types that are generally held in larger quantities and could be used in other firearms owned by them. The overall quantum of ammunition that is likely to be acquired through a buyback is therefore likely to be only a minor portion of the ammunition.
- The average lifespan of firearms owned by farmers will range significantly depending on the nature of the business, enterprise mix, property size and pest pressures, and the firearm itself (action, calibre, failure points). Farmers typically report that firearms purchases are generally viewed as once-off investment, estimating the purchase is intended to be used for at least 10 years, potentially much longer (20+ years). We anticipate firearms purchased within the past 10 years will be especially sensitive based on the increases in firearm prices and the expensive investments made by farm businesses in these, and related accessories/ spare parts.

Transitional arrangements

- The transitional arrangements must allow reasonable time for primary producers to meet any new requirements they are subject to including applications for a higher licence category, additional firearms, ownership transfers or safe storage measures.
- This must include appropriate resourcing for government processing of any applications to ensure there are no delays that inhibit producers from access to the tools required to do their jobs, in addition to clear clarity on the changes for licence holders.

Meaningful consultation

- Regulation change and design of the buyback scheme must be informed by meaningful engagement with stakeholders including primary producers who farm in the ACT to avoid any adverse impacts or unintended consequences for food and fibre production.
- This could occur through a stakeholder committee with primary production representation, to inform the government's firearms policy and regulation.

- The lack of consultation with affected stakeholders in the Bill that passed the NSW Parliament on 24 December, has created significant implementation challenges including feasibility issues and unclear evidence-basis.

Other matters

NSW Farmers understands that the ACT Government is seeking to align changes with those made in NSW. NSW Farmers supports measures to ensure that there is practical consistency for primary producers, especially in border areas where farmers often farm in both the ACT and NSW. However, there are a number of changes that we do not support that have been made in NSW, which NSW Farmers is actively seeking to be resolved to ensure feasibility. The ACT Government should consider the sector's feasibility concerns if the following changes are considered at a later stage.

- Gun club membership:
 - NSW Farmers does not support any requirement for primary producer licence holders to have mandatory gun club membership.
 - The requirement is severely impractical in rural areas where there are not applicable gun clubs or shooting ranges, will require greater movement of firearms and is at odds with the primary production genuine reason.
- Review of licensing decisions:
 - NSW Farmers has considerable concerns regarding the removal of the avenue to appeal a licence decision through the NSW Civil and Administrative Tribunal due to lack of procedural fairness and potential unintended consequences regarding false accusations.
 - Focus on the underlying problems regarding agency data-sharing must be prioritised in the first instance and ability for merit review should be maintained in the ACT.
- Licence terms:
 - Reducing the licence terms and requiring reapplication every 2-years instead of 5-years will add to the administrative burden to law-abiding licensees without clear benefits to be gained.
 - NSW Farmers has concerns that there will be delays in the processing of licence application/renewals due to the requirement for more frequent intervals – potentially limiting producers from using essential tools in their farm operations.
 - Enhancement of existing mechanisms to cancel licences due to criminal behaviour provide more effective means to achieve the intent of this change – including overcoming data-sharing and/or resourcing barriers.
- Recreational hunting licences:
 - The important role of recreational shooters in pest management outcomes for agriculture must be recognised, ensuring that there are not unintended consequences for farm safety and biosecurity through the significant changes to this licence category.
 - Many farm businesses rely on recreational hunters, and the changes must ensure practicality - including collaboration with other farmers on their properties. Restrictive caps on firearms and requirements such as gun club membership have the potential to significantly impact the important function of recreational licences for agriculture.
- National Firearms Registry:
 - State, Territory and Federal Governments must focus on ensuring that those operating illegally (outside of the rules) are meaningfully addressed not just those following the rules, including through the ongoing development of the national firearms registry.
 - NSW Farmers has been engaged through the national firearms registry consultation processes, broadly supporting the intent of improved safety through transparency but

emphasising that it must be practical. However, our ongoing concerns are that this mechanism is reliant on visibility of legally owned firearms not those operating illegally outside of the rules.

- Equally, realising the potential benefits of the registry continues to be limited by different state and territory-based data capabilities.
- The ACT Government's commitment that the ACT Firearms Registry will transition from a paper-based system to a fully digital platform is welcomed, to ensure that this can be realised.

- Borrowing and lending of firearms

- Existing arrangements in NSW and the ACT where firearm borrowing is allowed is working as intended and are adequate. Existing lending arrangements where a firearm owner can be lent to someone who has the required licencing for that category of firearm. This should be adequate without additional suitability checks, if the lender has a licence in the first instance.
- As NSW Farmers has highlighted in previous federal consultations, the NFR process must focus on ensuring that those operating illegally (outside of the rules) are meaningfully addressed, for examples illegal firearms and modifications, not just those following the current rules. The national firearms registry process should remain focused on this core objective – to develop a national registry of firearms to accurately identify them.
- Adding additional reporting for firearms licensees and owners is highly likely to add unnecessary burdens to those following the rules, including impractical burdens. There are legitimate use cases within agriculture where it is common place and reasonable that members a family farming unit or employees would borrow firearms to undertake operations on the farm's properties. Primary production operations should be exempt from mandatory reporting within 24 hrs as this would add a considerably onerous burden to movements which are not high risk or the target of these reforms. Firearms loans that are for an extended duration (beyond a week) should be the focus.
- Should these changes be implemented, there would need to be simplicity in how to lodge with multiple options (e.g. online/phone)

- Near-real-time sharing of information

- There are farmers who have properties on both sides of the border. Any changes must ensure practicality for firearms movements and licensing so that farmers are not limited from access or use of tools for critical operations.
- Requirements for the registered owner of a firearm to notify the registrar within 24 hours of any change to the location where an item is stored will be highly impractical for farm businesses. Primary production operations should be exempt from mandatory reporting within 24 hrs as this would add a considerably onerous burden to movements which are not high risk or the target of these reforms. Changes to firearms storage than extended duration (beyond a week) should be the focus.