



Submission cover sheet

Inquiry into Legislation on proposed firearms reform

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ACT Farmers Submission to ACT Legislative Assembly Inquiry into Firearms (Public Safety) Amendment Bill 2026

The ACT Rural Landholders Association of Farmers (ACT Farmers) is the peak representative body for farmers in the ACT, and this submission responds to the ACT Legislative Assembly's *Inquiry into Firearms (Public Safety) Amendment Bill 2026*.

ACT Farmers were shocked and dismayed by the violence that occurred at Bondi Beach on 14th December 2025. We consider community and landholder safety to be a high priority, and we support sensible reforms that strengthen this. We welcome this opportunity to contribute to the Inquiry with the agriculture sector's views.

Firearms play a legitimate and essential role as a tool of trade in agriculture around Australia including in the ACT. There are approximately 160 rural leaseholders (farmers) in the Territory, and we manage approximately 15% of the Territory's land area. Farmers have mandatory Land Management Agreements, approved by the ACT Government's Conservator for Flora and Fauna, which require us as stewards of the lands to "control" pest animals, which is the invasive animal species that threaten biosecurity and the ACT's ecosystems, as well as farm productivity. Firearms are critical for best practice animal welfare for both livestock euthanasia which is necessary from time to time, and for required control of pest animals.

Firearm ownership and use is already highly regulated, and farmers take our responsibilities seriously. ACT Farmers recognise that the intent of this Bill is not to restrict the lawful and safe use of firearms in agriculture. However, it is vital to ensure that law-abiding farmers do not face unintended consequences which undermine farm workers and contractors' safety, farmers safety, animal welfare, and environmental management.

ACT Farmers raise the following issues as areas of concern for any firearm reforms.

- **Buyback Scheme:** If firearms owners are required to surrender firearms to meet new requirements, then fair compensation must be available to avoid further penalty. Importantly, this needs to include ammunition, accessories and parts associated with the firearms required to be surrendered, with compensation based on fair market value. It's noted that Tasmanian has announced that their buy-back will be at 1.5 times market value.
- **Cap on number of firearms:** Farm operations range significantly in size, commodity, operating environment and pest pressures. There will be farmers that have genuine use-cases for requiring more than 10 firearms and there must be a feasible and reliable pathway to apply for approval of additional firearms based on primary production requirements.
- **Firearms registry resourcing:** There is a likely risk of processing delays due to the nature and complexity of the changes. ACT Farmers does not support changes to an existing effective system where those changes will lead to backlogs, increased costs, administrative burden, and delays.

- **Recategorization of certain firearm types:** Of particular concern is the recategorization of straight pull action firearms. These are manual bolt actions and widely used internationally in many firearms. For example, competitors in the winter Olympic biathlon competition are required to use Anschutz straight pull action firearms. The effect of this recategorization will be to force farmers (and other firearm users) to obtain a higher category of licence, which would then also give them access to other even more rapid-fire firearms. Recategorizing straight pull actions is an unnecessary step too far and will have a counter intuitive effect and is in direct contradiction to the categorical statements politicians have made that sporting competitors will not be impacted by any law changes.
- **License decisions:** Considerable discretionary power is being given to the Registrar to make licensing decisions and override ordinary human rights. It is essential that mechanisms are in place to provide procedural fairness and more generally have a safeguard for honest and reasonable mistakes given the complexity and technical ambiguity of the subject matter. See below for our recommendation for a “reasonable position” safe harbour provision combined with binding better practice guides.
- **Recreational hunting licences:** Many farm businesses rely on recreational hunters for vertebrate pest animal control and the significant changes for this group must ensure practicality. For example, pest management ranges from small vermin to large game. Different sized firearms are required to safely and effectively manage the range of pest animals that destroy our environment. In addition, pest management is undertaken during daylight and at night, which will necessitate two firearms for the same purpose, one with glass optics and one with thermal optics. It is extremely likely recreational hunters undertaking pest management will require more firearms than the cap allows, and the law should adequately cater for this. Further, the grouping of any pest animal control as “recreational hunting” is inaccurate as on-farm pest control is a considerable burden that requires both time and money. The Agriculture Department estimates farmers spend \$5.3 billion a year on controlling pest animals and weeds, it’s a massive problem and the system needs to support the enormous amount of environmental work farmers do for free for the community.

ACT Farmers recommends that the existing ACT Government kangaroo proficiency testing authorisation under the Nature Conservation Act, be extended to include all invasive species, and the holding of a valid authorisation will meet the requirement of a “pest control” licence classification.

- **Timing:** Amendments to the regulation and design of the gun buyback scheme need to be informed by robust stakeholder engagement including primary producers. In addition, sufficient time and clarity for licence holders must be provided to transition.
- **Sound suppression:** Sound suppression devices, which also reduce recoil, concussion and barrel lift, are an essential piece of work health and safety (WHS) equipment. Government employees and contractors are required to use sound suppression to manage the risk to themselves. Many countries mandate the use of sound suppressors and most firearms are now manufactured with muzzle threading to enable sound suppression devices. It is anomalous that ACT farmers would be restricted from using this necessary WHS

equipment. The level of regulation and red tape proposed in the discussion paper is not proportionate and will unnecessarily discriminate against ACT farmers and their employees right to a safe workplace. Farm employee's will be unfairly targeted by these rules e.g. if the farmer has permission to own and possess a firearm with a suppressor, and the employee has a licence to use the firearm, the employee will not have legislated authorisation to also use the suppressor. Given that firearms and suppressors have different muzzle threads and bore sizes, it is likely different suppressors will be needed for each firearm. Once a farmer has authorisation to own and use a suppressor, the authorisation should automatically recognise the multiple types of suppressors that will be required to be fitted to each registered firearm. In practice this might be achieved by linking the firearm serial number to the suppressor serial number.

- **Regulation of interstate movements:** Given that the ACT is a small island within NSW, some farmers have holdings in both the ACT and NSW. Travelling around their own farms, these farmers may cross a state border many times a day. Further, ACT farmers will have gunsmiths and ammunition suppliers in NSW that they will frequently need to take their firearms to, therefore the term “storage location” is ambiguous in this context. For example, if an ACT farmer takes a firearm to a NSW dealer and leaves it with the dealer for a week for repairs, is this a trackable change of storage location? Or if an ACT farmer crosses the border to their NSW holding and resides there for the week and undertakes pest management control, is this a trackable change of storage location? The proposal in the discussion paper puts farmers at considerable risk of non-compliance with overly prescriptive and ambiguous rules.
- **Firearms borrowing and lending:** Farmers will continue to have a requirement for employees to use their firearms (and suppressors with the issues noted above). In addition, with the new caps being imposed, it is highly likely that others undertaking pest control for the farmer cannot own the required sized firearm within their cap and will be reliant on using the farmer's firearm. Capping firearm numbers will increase the need for borrowing and lending of firearms. With farmers often having holdings in both the ACT and NSW, and employees and pest controllers residing and working between jurisdictions, it is imperative that sensible and workable rules prevail. There is a considerable risk that these rules will leave law abiding citizens wanting to do the right thing in a precarious situation.
- **Power to require health assessments:** Introducing a requirement for licence applicants and license holders undergo unspecified “health assessments” is too broad ranging and is opposed by ACT Farmers. Identifying people with mental health issues in an attempt to stop them from misusing firearms is entirely understandable, however implementing it is both logistically fraught and potentially a breach of human rights. If this requirement is introduced for firearm licences, then it should also apply to other groups such as working with vulnerable people licence holders.
- **Introduce an offence to possess digital blueprints for the computer-aided manufacture of firearms and firearm parts:** ACT Farmers supports the intent of the new offences but seeks assurance that ambiguous drafting will not capture legitimate materials or activities, such as technical specifications, historical or educational content, safety materials, or

documentation for lawful maintenance and repair. ACT Farmers are concerned about unintended impacts on licensed firearm owners, including routine handloading or reloading of ammunition, and the lawful construction (3D-printed or otherwise) of equipment such as ammunition loading blocks or trays, or sight-alignment tools, as examples.

We have seen the consequences of complex, technical, vague and ambiguous laws with the recent Dissent Café raid incident. It leaves police and law-abiding citizens in an impossible position. Given their far-reaching overriding of human rights, it is critical that these firearms laws have a “reasonable position” safe harbour. ACT Farmers requests that government release a series of better practice guides for land managers in the ACT that would satisfy the requirements of a safe harbour provision. The guides could focus on how, as majority land managers in the ACT, the government implements all the relevant laws across its operations. The first guide could be *vertebrate pest animal control - use of firearms*. It might cover what’s an acceptable threshold of environmental damage before a landholder is required to undertake control (e.g. wild horses zero tolerance), how to manage the animal welfare requirements (e.g. wild horses to be culled with a 300 win mag or 338 lapua mag), safe work requirements (e.g. to reduce risk of recoil, concussion and excessive noise, these firearms must have a sound suppressor fitted), how government employees meet the firearms requirements imposed on them e.g. how they obtain a licence; what sort of licence do they require e.g. recreational or pest management; how they obtain a prohibited weapons permit; how they meet safe storage requirements eg transportation, working from home arrangements; how borrowing and lending works between them and their employer; how interstate licencing and movement works in practice for employee’s who don’t live in the ACT. Plus, the many other matters covered in the firearms discussion paper could have practical and real word examples based on the government’s own best practice land management.

ACT Farmers will continue to advocate that changes to firearms laws be feasible and not unduly rushed. We respectfully ask that the ACT Government commit to working with relevant industry organisations representing individuals and businesses, that legitimately require firearms for their work, including ACT Farmers. This is not an attempt to delay legislative improvements, but to ensure understanding of the implications of the Bill and to enable issues that may arise to be addressed with sufficient expertise.