



Submission cover sheet

Inquiry into the Firearms (Public Safety) Amendment Bill 2026

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**Submission to the Standing Committee on Legal Affairs
Inquiry into the Firearms (Public Safety) Amendment Bill 2026
(ACT)**

Submitted by:
Shooters Union Australia Limited

Submission relating to:
Firearms (Public Safety) Amendment Bill 2026

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This submission is made on behalf of Shooters Union Australia and its members. It reflects the organisation's views at the time of submission, based on the information available and the consultation timeframe provided.

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Executive Summary

Shooters Union Australia opposes the Firearms (Public Safety) Amendment Bill 2026 (ACT) in its current form.

While the objective of promoting public safety is legitimate, legislative reform must be demonstrably necessary, proportionate and supported by evidence. The Bill introduces sweeping restrictions on lawful firearms ownership, expands criminal liability into the digital sphere, and alters long-standing licence category structures without providing ACT-specific evidence demonstrating that compliant licence holders present the risks the Bill purports to address.

The Bill:

- Imposes arbitrary numerical caps on firearms possession;
- Recategorises and restricts manually operated firearms through magazine limits and action-type amendments;
- Prohibits belt-fed firearms without demonstrating civilian prevalence;
- Creates a broad digital blueprint offence incorporating strict liability elements and reverse onus provisions.

The Explanatory Statement relies heavily on generalised public safety assertions. It does not provide measurable ACT data demonstrating that the quantity of firearms lawfully owned by compliant individuals correlates with diversion, misuse or community harm. Nor does it establish that the action types or magazine capacities targeted by the Bill have contributed to criminal offending within the ACT.

The digital blueprint offence is particularly concerning. Its breadth, expansive definition of possession, strict liability elements and legal burden defences depart from orthodox criminal law principles and risk capturing inadvertent or benign conduct.

The cumulative effect of the Bill is to materially restrict compliant licence holders while failing to demonstrate that the measures adopted are the least rights-limiting means reasonably available.

Significant amendment is required to ensure that the legislation is evidence-based, proportionate, technically accurate and consistent with fundamental principles of criminal justice.

1. About Shooters Union Australia

Shooters Union Australia is a national representative organisation for licensed firearms owners. Our membership includes sporting shooters, recreational shooters, primary producers, collectors, industry participants and occupational users.

Our members operate within one of the most highly regulated civilian firearms frameworks in the world. They are subject to:

- Criminal history checks;
- Ongoing fit and proper person assessments;
- Permit to acquire processes;
- Secure storage inspections;
- Suspension and revocation powers;
- Prosecution for any breach of licence conditions.

Shooters Union Australia has extensive experience engaging with firearms legislation and regulatory reform at state and federal levels. Our submissions are informed by legal analysis, operational experience and direct consultation with affected licence holders.

We support evidence-based policy that genuinely targets criminal misuse while preserving fairness and proportionality for compliant individuals.

2. Scope of This Submission

This submission addresses the principal amendments contained within the Firearms (Public Safety) Amendment Bill 2026 (ACT), namely:

- Numerical limits on firearm possession (proposed new section 52A);
- Recategorisation and restriction of firearm types and magazine capacities;
- Prohibition of belt-fed firearms;
- Creation of the digital blueprint offence (proposed section 228A);
- Transitional and implementation implications.

Shooters Union Australia does not dispute that unlawful manufacture, trafficking and criminal misuse of firearms must be addressed firmly. Our submission is directed at ensuring that measures remain:

- Proportionate to identified risk;
- Targeted at high-risk individuals rather than compliant licence holders;
- Consistent with criminal law safeguards;
- Administratively workable and legally certain.

3. Analytical Framework

In assessing the Firearms (Public Safety) Amendment Bill 2026, Shooters Union Australia has applied the following evaluative framework:

- **Evidence of Identified Risk**
Whether the measure responds to demonstrable ACT-specific risk supported by data.
- **Proportionality**
Whether the measure is rationally connected to its objective and represents the least restrictive means reasonably available.
- **Targeting of High-Risk Individuals**
Whether the reform is directed at criminal misuse rather than compliant licence holders.
- **Preservation of Criminal Law Safeguards**
Whether the measure maintains fault-based liability and respects the presumption of innocence.
- **Administrative Workability and Certainty**
Whether the measure provides clear statutory criteria and avoids arbitrary discretion.
- **Transitional Fairness**
Whether existing lawful owners are protected from retrospective disruption or inadvertent criminalisation.

Where the Bill departs from these principles, amendment is required.

4. Numerical Caps on Firearms (Proposed New Section 52A)

The Bill inserts proposed new section 52A into the Firearms Act 1996 (ACT), introducing quantitative limits on the number of firearms that may be possessed or used under a licence.

The framework establishes:

- A default cap of five firearms;
- A cap of ten firearms for those possessing firearms for a “relevant genuine reason”, subject to potential registrar approval for a higher number via regulation;
- No numerical limit for dealers, collectors and composite entities;
- A rule that multiple licences cannot be aggregated to exceed the highest applicable limit.

This represents a fundamental shift in the ACT’s regulatory model. Historically, the ACT has regulated firearms ownership through suitability, genuine reason, secure storage and permit-to-acquire mechanisms. The introduction of fixed numerical caps is a new and materially restrictive policy direction.

4.1 Absence of Evidence Demonstrating Risk Correlation

The Explanatory Statement asserts that limiting the number of firearms reduces diversion and misuse risk. However, no ACT-specific data is provided demonstrating that:

- Lawful licence holders possessing more than five or ten firearms are statistically more likely to divert firearms;
- Diversion events correlate with quantity rather than non-compliance or criminal intent;
- The ACT has experienced diversion patterns linked to lawful multi-firearm ownership.

The quantity of firearms lawfully owned by a compliant individual is not, in itself, a recognised risk indicator. Risk is more accurately associated with:

- Criminal associations;
- Non-compliance with storage obligations;
- Mental health risk factors;
- Organised trafficking conduct.

The Bill does not demonstrate that the proposed thresholds are calibrated to any empirical risk metric. Without such evidence, the numerical caps appear arbitrary.

Recommendation 1

Require the Government to table ACT-specific evidence demonstrating that lawful possession of more than five or ten firearms correlates with measurable public safety risk.

4.2 Arbitrary Nature of Fixed Thresholds

The distinction between five and ten firearms is not explained through reference to criminological evidence or operational risk modelling. The choice of threshold appears policy-driven rather than evidence-driven.

A person who lawfully owns six firearms does not, by virtue of that fact alone, present greater public safety risk than a person who owns five. Nor is there evidence that possession of eleven firearms inherently creates risk beyond possession of ten.

Blunt numerical thresholds are not risk-based regulation. They are administrative ceilings untethered from demonstrable harm.

Recommendation 2

Remove the fixed numerical caps in proposed section 52A and replace them with a risk-based regulatory model tied to compliance history, secure storage capacity and genuine reason.

4.3 Impact on Sporting and Occupational Users

The Bill recognises sport and target shooting, primary production and occupational purposes as relevant genuine reasons. However, a ten-firearm ceiling may materially affect individuals who:

- Compete across multiple disciplines requiring different calibres and configurations;
- Maintain competition and training firearms;

- Maintain historically significant firearms used in active sporting contexts;
- Require multiple firearms for pest management across varied conditions.

The Bill does not distinguish between high-risk scenarios and legitimate multi-discipline participation. It instead imposes a uniform cap that may restrict lawful sporting engagement without evidence of necessity.

Recommendation 3

Insert an explicit statutory exemption for bona fide multi-discipline sporting and occupational users, where no compliance risk is identified.

4.4 Registrar Discretion and Regulatory Uncertainty

The Bill permits the registrar to approve possession above ten firearms subject to requirements prescribed by regulation.

This approach creates significant legal uncertainty:

- No statutory criteria are provided governing the exercise of discretion;
- Decision-making standards are left to future regulation;
- Applicants cannot predict the threshold for approval;
- Inconsistent administrative outcomes are likely.

Where criminal liability attaches to exceeding a numerical limit, the statutory framework must be precise and predictable.

Recommendation 4

Amend proposed section 52A to include clear statutory criteria governing any approval to exceed baseline limits, including mandatory consideration of compliance history, storage adequacy and genuine reason.

4.5 Transitional Fairness and Grandfathering

The transitional provisions prevent acquisition applications that would exceed future limits prior to commencement. However, the Bill does not explicitly address the status of existing lawful owners who may already exceed the proposed limits at commencement.

Where legislation materially alters the lawful status of property previously acquired in compliance with the law, fairness requires clear transitional protection.

Absent express grandfathering, compliant individuals risk forced disposal or unintended non-compliance.

Recommendation 5

Insert express grandfathering provisions protecting existing lawful licence holders who exceed the proposed numerical limits at commencement.

5. Recategorisation and Action-Type Restrictions

The Bill amends Schedule 3 to further restrict the firearms authorised under Categories A, B, C and D, including:

- Restricting straight pull repeating action firearms;
- Restricting self-opening and self-closing action firearms;
- Tightening magazine capacity limits;
- Further limiting pump-action and lever-action shotguns;
- Expressly excluding belt-fed firearms from Categories C and D.

The Explanatory Statement frames these amendments as restricting access to high-capacity and rapid-fire firearms. However, several of the firearms captured are manually operated systems that do not meet any conventional definition of rapid-fire capability.

5.1 Misclassification of Manually Operated Firearms

Straight pull repeating action firearms remain manually operated. Each shot requires physical manipulation of the action by the user.

Similarly, self-opening and self-closing action systems, while mechanically distinct, do not operate as self-loading firearms. They still require deliberate manual input between shots.

The Bill does not provide evidence that these systems:

- Have been used in criminal offending within the ACT;
- Present greater diversion risk than conventional bolt-action firearms;
- Are functionally comparable to self-loading systems in misuse scenarios.

Recategorising manually operated firearms without technical evidence risks conflating fundamentally different mechanical systems.

Recommendation 6

Remove the reclassification of straight pull, self-opening and self-closing manually operated firearms unless ACT-specific evidence demonstrates a measurable increase in public safety risk.

5.2 Magazine Capacity Thresholds

The Bill reinforces magazine capacity limits of five or ten rounds depending on firearm type and category.

The Explanatory Statement asserts that restricting magazine capacity reduces the risk of mass casualty events. However, it does not provide ACT-based data demonstrating that:

- Lawful ACT licence holders have misused firearms with magazine capacities exceeding the proposed thresholds;
- Magazine capacity has contributed to diversion within the ACT regulatory environment.

Magazine capacity restrictions materially affect:

- Competitive shooting disciplines;
- Hunting practices;
- Practical sporting formats designed around specific configurations.

Without ACT-specific evidence, the restrictions appear precautionary rather than proportionate.

Recommendation 7

Require publication of ACT-specific evidence demonstrating that current lawful magazine capacities contribute to measurable public safety risk before implementing further restrictions.

5.3 Impact on Sporting Participation and Industry

Recategorisation of straight-pull firearms to Category C would not simply require administrative adjustment. In the ACT regulatory framework, Category C is restricted to limited genuine reasons that are not available to ordinary sporting shooters.

If straight-pull firearms are reclassified as Category C:

- Existing Category A/B licence holders will not be eligible to retain them;
- There is no practical “licence upgrade” pathway available to ordinary sporting shooters;
- Affected owners will be required to dispose of those firearms.

In practical terms, this represents compulsory divestment of previously lawful property.

The Bill does not contain:

- Explicit compensation mechanisms;
- Clear statutory grandfathering provisions;
- Defined timeframes for compliance;
- Clarity regarding acquisition or surrender arrangements.

Where government reclassifies previously lawful property into a category inaccessible to existing owners, the impact is not regulatory refinement — it is forced disposal.

Procedural fairness and legal certainty require transparent transitional arrangements and clear policy acknowledgement of the real-world consequences.

Recommendation 8

Insert clear statutory transitional provisions for firearms affected by recategorisation, including either grandfathering protections or a defined and funded compensation framework where lawful owners are required to dispose of previously lawful property.

5.4 National Consistency and Scope

The Bill references National Cabinet commitments following the Bondi attack. However, it is not evident from the materials provided that:

- The ACT is required under the National Firearms Agreement to implement each of the proposed recategorisations;
- Other jurisdictions have adopted identical mechanical action classifications.

The Committee should scrutinise whether the ACT is exceeding harmonised national standards without clear justification.

Recommendation 9

Require the Government to table comparative analysis demonstrating that the proposed recategorisations are strictly necessary to meet national harmonisation obligations.

6. Prohibition of Belt-Fed Firearms

The Bill inserts belt-fed firearms into the prohibited firearms list.

Shooters Union Australia acknowledges that belt-fed firearms are historically restricted and rare in civilian contexts. However, the materials provided do not disclose:

- The number of belt-fed firearms lawfully registered within the ACT;
- Whether any collectors are currently authorised to possess such firearms;
- Transitional arrangements for affected individuals.

Even where prevalence is low, legislation should be evidence-based and transparent.

Recommendation 10

Publish ACT-specific data regarding lawful civilian ownership of belt-fed firearms and insert clear transitional protections where applicable.

7. Digital Blueprint Offence (Proposed Section 228A)

The Bill introduces proposed section 228A, creating an offence for possession of a digital blueprint capable of enabling the computer-aided manufacture of a firearm or firearm part.

The offence:

- Carries a maximum penalty of five years imprisonment and 500 penalty units;
- Applies strict liability to elements concerning whether the item is a firearm or firearm part and whether it may be manufactured using the blueprint;
- Defines “digital blueprint” broadly to include digital reproductions of technical drawings, electronic coding and computer-aided design;
- Defines “possession” expansively to include control of material stored on remote or cloud-based systems;
- Imposes evidential and legal burdens on the accused in relation to certain exceptions and defences.

Shooters Union Australia supports firm action against unlawful firearm manufacture. However, the drafting of section 228A extends beyond what is necessary to achieve that objective.

7.1 Overbreadth of the Definition of “Digital Blueprint”

The definition of “digital blueprint” is extremely broad. It may capture:

- Archival historical schematics;
- Academic or engineering research material;
- Technical diagrams contained within electronic publications;
- Hobbyist design files stored alongside unrelated projects;
- Legacy CAD files not intended for manufacture.

The offence does not require that the blueprint be designed for unlawful manufacture. It requires only that the item “may be manufactured” using the digital file in combination with a computer-aided manufacturing device.

Given the widespread availability of technical material online and the global publication of firearms schematics in academic and historical contexts, the breadth of the definition risks criminalising conduct unrelated to criminal intent.

Criminal offences must be drafted with precision. Where serious imprisonment penalties are involved, overbreadth is unacceptable.

Recommendation 11

Amend proposed section 228A to narrow the definition of “digital blueprint” to material intended for unlawful manufacture of a firearm or firearm part.

7.2 Absence of an Intent Requirement

The offence does not require proof that the person:

- Intended to manufacture a firearm unlawfully; or
- Intended that the blueprint be used for unlawful manufacture.

Instead, liability arises from possession alone, subject to limited defences.

In serious criminal offences, fault-based liability is the norm. Where intention to commit unlawful manufacture is absent, the connection between possession and criminal culpability is weak.

An offence designed to prevent illicit manufacture should require proof of intent to manufacture unlawfully or to facilitate unlawful manufacture.

Recommendation 12

Insert an explicit fault element requiring proof that the person possessed the digital blueprint with intent to unlawfully manufacture a firearm or firearm part.

7.3 Strict Liability Elements

The application of strict liability to core elements — namely whether the item is a firearm or firearm part and whether it may be manufactured using the blueprint — reduces the prosecution’s burden.

While firearms are regulated items, the fact of regulation does not justify departure from fault-based liability in an offence carrying imprisonment.

The Human Rights Compatibility Statement asserts that strict liability is justified because relevant matters are capable of technical determination. However, the seriousness of the offence demands careful calibration.

Strict liability in this context risks convicting individuals without proof of culpable mental state in relation to essential elements.

Recommendation 13

Remove strict liability from proposed section 228A and require proof of fault in relation to all essential elements of the offence.

7.4 Legal and Evidential Burdens on the Accused

Proposed section 228A:

- Imposes an evidential burden for certain exceptions;
- Imposes a legal burden on the accused for specific defences, requiring proof on the balance of probabilities.

The imposition of a legal burden in a serious indictable offence is a significant departure from the presumption of innocence.

Although the Explanatory Statement argues that relevant matters are within the knowledge of the defendant, criminal law traditionally requires the prosecution to prove guilt beyond reasonable doubt.

The cumulative effect of strict liability and legal burdens risks undermining established safeguards.

Recommendation 14

Convert all legal burden defences in proposed section 228A to evidential burdens, preserving the prosecution’s obligation to disprove raised defences beyond reasonable doubt.

7.5 Digital Possession in Modern Computing Environments

The definition of possession includes:

- Files stored in cloud systems;
- Files accessible via remote control;
- Devices containing stored data.

Modern computing environments involve:

- Automatic synchronisation;
- Cloud backups;
- Shared devices;
- Cached downloads;
- Bundled file packages.

An individual may unknowingly possess digital material due to automatic processes. Although a defence exists for unsolicited possession, it requires proof by the accused.

Without an intent requirement, individuals may be exposed to criminal liability for passive or inadvertent digital storage.

Recommendation 15

Amend proposed section 228A to exclude passive, automated or inadvertent digital possession and require proof of deliberate acquisition or retention for unlawful purposes.

7.6 Proportionality and Least Restrictive Means

The Human Rights Act requires that limitations be the least restrictive means reasonably available.

A proportionate alternative would:

- Criminalise possession of digital blueprints with intent to unlawfully manufacture;

- Maintain strong penalties for deliberate criminal conduct;
- Avoid capturing academic, archival or inadvertent possession;
- Preserve fault-based criminal liability.

As currently drafted, proposed section 228A fails the least restrictive means test.

8. Implementation, Transitional Arrangements and Regulatory Transparency

8.1 Impact on Existing Licence Holders

The Bill materially alters:

- Numerical possession limits;
- Licence category authorisations;
- Criminal liability in digital contexts.

However, it does not clearly articulate:

- The status of existing firearms exceeding new limits;
- The timeframe for compliance;
- Whether compensation mechanisms will be available where property must be disposed of;
- How licence holders will be notified of reclassification obligations.

Clear statutory transitional provisions are essential to prevent inadvertent criminalisation.

Recommendation 16

Insert comprehensive statutory transitional provisions addressing existing firearms, compliance timeframes and lawful continuation of possession pending adjustment.

8.2 Grandfathering and Property Rights

Where individuals acquired firearms lawfully under the regulatory framework in force at the time, retrospective restriction without grandfathering undermines legal certainty.

Grandfathering is consistent with fairness and reduces administrative burden associated with forced disposal.

Recommendation 17

Insert express grandfathering protections for firearms lawfully acquired prior to commencement of recategorisation or numerical cap amendments.

8.3 Regulatory Transparency

Several provisions rely on future regulations and registrar discretion.

Effective compliance requires:

- Publication of draft regulations prior to commencement;
- Clear public guidance on approval criteria;
- Transparent administrative standards.

Recommendation 18

Publish draft regulations and detailed administrative guidance prior to commencement to ensure compliance certainty and consistency.

8.4 Post-Implementation Review

Where significant structural reforms are introduced, Parliament should require review of measurable outcomes.

A review mechanism would assess:

- Whether numerical caps reduced diversion;
- Whether recategorisation improved public safety outcomes;
- Whether the digital blueprint offence resulted in appropriate enforcement.

Recommendation 19

Insert a statutory requirement for independent review of the amendments within three years of commencement.

Conclusion

Shooters Union Australia recognises the responsibility of government to promote public safety and prevent criminal misuse of firearms. Measures that are properly targeted at trafficking, unlawful manufacture and high-risk individuals warrant strong enforcement.

However, the Firearms (Public Safety) Amendment Bill 2026 introduces structural reforms that extend beyond targeting criminal conduct. The Bill:

- Imposes arbitrary numerical caps without ACT-specific evidence of risk;
- Recategorises manually operated firearms without technical justification;
- Restricts magazine capacities absent demonstrated correlation to criminal misuse in the ACT;
- Creates a broad digital blueprint offence incorporating strict liability and legal burden provisions inconsistent with orthodox criminal law principles;
- Provides limited clarity regarding transitional protections for existing lawful owners.

The cumulative effect is to materially burden compliant licence holders while failing to demonstrate that the measures adopted are the least rights-limiting means reasonably available.

Public safety is strengthened when legislation is precise, evidence-based and directed at culpable conduct. It is weakened when regulatory reform is untethered from demonstrable risk and departs from foundational criminal justice safeguards.

Shooters Union Australia respectfully submits that substantial amendment is required before the Bill proceeds.

Shooters Union Australia welcomes the opportunity to appear before the Committee to provide further evidence, technical clarification and drafting assistance.

Consolidated Recommendations

Recommendation 1	Require the Government to table ACT-specific evidence demonstrating that lawful possession of more than five or ten firearms correlates with measurable public safety risk.
Recommendation 2	Remove the fixed numerical caps in proposed section 52A and replace them with a risk-based regulatory model tied to compliance history, secure storage capacity and genuine reason.
Recommendation 3	Insert an explicit statutory exemption for bona fide multi-discipline sporting and occupational users, where no compliance risk is identified.
Recommendation 4	Amend proposed section 52A to include clear statutory criteria governing any approval to exceed baseline limits, including mandatory consideration of compliance history, storage adequacy and genuine reason.
Recommendation 5	Insert express grandfathering provisions protecting existing lawful licence holders who exceed the proposed numerical limits at commencement.

Recommendation 6	Remove the reclassification of straight pull, self-opening and self-closing manually operated firearms unless ACT-specific evidence demonstrates a measurable increase in public safety risk.
Recommendation 7	Require publication of ACT-specific evidence demonstrating that current lawful magazine capacities contribute to measurable public safety risk before implementing further restrictions.
Recommendation 8	Insert clear statutory transitional provisions for firearms affected by recategorisation, including either grandfathering protections or a defined and funded compensation framework where lawful owners are required to dispose of previously lawful property.
Recommendation 9	Require the Government to table comparative analysis demonstrating that the proposed recategorisations are strictly necessary to meet national harmonisation obligations.
Recommendation 10	Publish ACT-specific data regarding lawful civilian ownership of belt-fed firearms and insert clear transitional protections where applicable.
Recommendation 11	Amend proposed section 228A to narrow the definition of “digital blueprint” to material intended for unlawful manufacture of a firearm or firearm part.
Recommendation 12	Insert an explicit fault element requiring proof that the person possessed the digital blueprint with intent to unlawfully manufacture a firearm or firearm part.
Recommendation 13	Remove strict liability from proposed section 228A and require proof of fault in relation to all essential elements of the offence.
Recommendation 14	Convert all legal burden defences in proposed section 228A to evidential burdens, preserving the prosecution’s obligation to disprove raised defences beyond reasonable doubt.
Recommendation 15	Amend proposed section 228A to exclude passive, automated or inadvertent digital possession and require proof of deliberate acquisition or retention for unlawful purposes.
Recommendation 16	Insert comprehensive statutory transitional provisions addressing existing firearms, compliance timeframes and lawful continuation of possession pending adjustment.
Recommendation 17	Insert express grandfathering protections for firearms lawfully acquired prior to commencement of recategorisation or numerical cap amendments.
Recommendation 18	Publish draft regulations and detailed administrative guidance prior to commencement to ensure compliance certainty and consistency.
Recommendation 19	Insert a statutory requirement for independent review of the amendments within three years of commencement.