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**Department of Police, Fire and Emergency Management**

Strategy and Support

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Via email: [strategy.support@dpfem.tas.gov.au](mailto:strategy.support@dpfem.tas.gov.au)

Dear Sir/Madam,

Thank you for your opportunity to comment on the draft *Firearms Amendment (Community Safety) Bill 2023*.

Gun Control Australia has a longstanding interest in the control of firearms across Australia and particularly in this State. It is concerned to see that any legislative change sees an enhancement in community safety, not a reduction.

Despite the name of the Bill, the proposal to categorise lever action shotguns as Category B does nothing to enhance community safety. In fact, it is a retrograde step.

The Cat B decision for lever action shotguns included in the National Firearms Agreement (NFA) in 2017 should be rejected as a guidepost for Tasmania. There was no community consultation for the decision; it came out of the blue.

More to the point, it's utterly anomalous, given a Cat B gun at the moment is a:

- (a) muzzle-loading firearm; and
- (b) centre-fire rifle, other than self-loading; and
- (c) shotgun and centre-fire rifle combinations.

Cat B guns are not rapid fire, and they do not have magazines.

The incorporation of a rapid fire gun with a 5 shot magazine into this category of firearm undermines the integrity of the licensing system. It allows rapid fire shotguns to be relatively freely available for recreational shooting. Adler type weapons should be Cat C.

Furthermore, the lever action shotgun magazine is easily extendable. Videos on YouTube show how easy it is to do so.

And this video, from 59 seconds on, shows just how dangerous these weapons are:

<https://www.google.com/search?client=firefox-b&d&q=adler+firearm+video#fpstate=ive&vld=cid:6a2ffedb,vid:ZETC39Kf7AE>

The move to increase the list of Schedule 1A infringement notice offences - currently items 1-20 - to add a further 12 infringement offences is at least in part contrary to the NFA. Clause 44(b) of the NFA reads as follows:

*legislation must have the effect of making failure to store firearms in the manner required an offence as well as a matter that will lead to the cancellation of the licence and the confiscation of all firearms*

That would apply to proposed offences at items 23, 24, 32. There will be no cancellation of the licence with the issue of infringement notices.

Further to the above, the addition of items 22, 25-31 serve to trivialise offences under the Act and undermine the integrity of the licencing system and the matrix of regulation requiring vigilance and scrupulous record keeping. Accordingly, these proposals are opposed.

Further to any number of submissions we have made before about Tasmania's firearm laws being amended so as to comply with the NFA, I also bring to your attention that the Western Australian government has announced that it is going to require mental health checks for firearms licence holders. This is an excellent initiative and something that should be adopted in this jurisdiction and in this Community Safety Bill.

Further, the following amendments to the *Firearms Act* also need to be made.

- There is a need to sever any connection between firearm use and consumption of alcohol (or drugs). A person should not be permitted to use or possess a firearm if they have alcohol or drugs in their blood.
- It is time for a review of the availability of semi-automatic handguns. Our policy position is that semi-automatic handguns should be banned in Australia. That will allow target shooting to be carried out by single shot handguns. Most international and Commonwealth Games and Olympic shooting events can be entered into by a person with a single shot firearm.
- The NFA requirement of a minimum age of 18 years for a firearms licence needs to be implemented in this state.

Yours faithfully,

A handwritten signature in blue ink that reads "Roland Browne". The signature is written in a cursive style with a large initial 'R'.

Roland Browne  
Vice-President