



TASMANIA.
PROTECTING AND PROMOTING OUR RIGHT TO HUNT.

17 March 2023

Department of Police, Fire and Emergency Management
Strategy Support
GPO BOX 308
HOBART TAS 7001

**Submission on the
Draft Firearms Amendment (Community Safety) Bill 2023**

I am writing on behalf of the Australian Deer Association Tasmania to provide the following submission in relation to the draft Firearms Amendment (Community Safety) Bill 2023.

1. Section 17 – should be further amended to include lever action shotguns, a further amendment should be included to ensure that any firearms of historical or collectible significance are able to be transferred amongst collectors at reasonable compensation to ensure items of historical significance are not lost to future generations.
2. Section 104(4) – currently the Act allows the ‘Minister’ to determine the disposal of any firearm or ammunition forfeited to the Crown. The draft amendment changes this power to the ‘Commissioner’. We believe that this power should remain with the ‘Minister’ or amended to a ‘Magistrate’ as the ‘Commissioner’ is conflicted by their core duties and principals as the head of the Police and what they see in performance of their duties. The ‘Minister’ or in fact a ‘Magistrate’ is removed from this conflict and as a result would be able to make more informed and appropriate decisions after giving consideration to the value and mechanisms that caused the surrender of these items.
3. Section 118(1) – this amendment seeks to omit a firearm sound suppressor, we believe that this should be amended to allow sound suppressors in certain circumstances for category A, B & C firearms only.

Currently the use of suppressors is not covered in the National Firearms Agreement, and we believe there is a valid use for these in certain circumstances to reduce exposure to high sound pressure levels.

4. Section 118(2)(a) – the detachable firearm magazine should be increased to 10 rounds in the Act.
5. Section 119A – is being inserted, however we believe this wording should be amended to say “(1) A person is guilty of an indictable offence

punishable under the Criminal Code if the person possesses a digital blueprint with the intent to manufacture, on a 3D printer or on an electronic milling”

6. Section 129 – Surrender of firearm or firearm part can be made to a registered dealer for registration or disposal without the need to leave personal information with the dealer. This would enable previously unregistered firearms to enter the registration system.
7. Section 3 – The definition of Pistol should be updated to include all handguns including revolvers.
8. Section 148 – In this section ‘pistol’ should be removed as this prevents concerned members of rifle shooting clubs from notifying the Commissioner of concerns.
9. Section 47(3) – ‘additional disciplines’ requires further clarification to allow for license holders to try a discipline once without having to do so 3 or more times.
10. Section 47(3)(b) – Category H status should be able to be maintained by providing current proof of membership of an approved club.
11. Section 151(1) – subsection c should be removed. Subsection b should be replacing with ‘shooting club’ to cover rifle, pistol and/or shotgun.
12. Section 152 – should require the applicant to be deemed a fit and proper person.
13. Schedule 1(6) – Other jurisdictions are classifying firearms based on function rather than form and as a result this should be removed.
14. Schedule 1(7) – needs to be amended in line with the requested changes to section 118.

Additionally, Section 29(1)(d) requires an applicant to successfully complete an approved firearms safety course. We believe the delivery of an approved safety course should not be limited to TasTafe as there are a number of organizations that would be suitably qualified to deliver such a course.

Yours faithfully,
Scott Freeman
Tasmanian Coordinator
Australian Deer Association.

