



alannah &  
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foundation



# Rapid Review of Victoria's Firearms Laws

Submission from  
The Alannah & Madeline Foundation  
&  
The Australian Gun Safety Alliance

For their right to be safe

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## Executive summary

The Alannah & Madeline Foundation (the Foundation), together with the Australian Gun Safety Alliance (AGSA), welcomes the Victorian Government's Rapid Review of Victoria's firearms laws and the clear intent to identify opportunities to strengthen firearm regulation in the interests of community safety.

The Foundation's position is grounded in a child-rights and public health harm-reduction framework, consistent with the National Firearms Agreement (NFA) principle that firearm possession is a privilege conditional upon public safety, and with the overriding purpose of the *Firearms Act 1996 (Vic)* to ensure public safety and peace. AGSA is a broad coalition representing community interests in gun safety and advocates for vigilance to avoid any drift toward a culture of gun entitlement.

### Framing: public safety and harm reduction must be paramount

This submission emphasises a simple proposition: **firearms are uniquely lethal**, and policy settings should be assessed against the test of public safety. The Foundation therefore urges the Review to apply harm-reduction principles that have long guided regulation in other high-risk policy domains, and to **ensure community safety prevails over commercial convenience or sectoral interests**.

### Priority reforms to strengthen Victoria's firearms laws

The submission responds to the questions put forward by the Rapid Review, provides recommendations and identifies several key opportunities to strengthen Victoria's firearms laws in practical, proportionate ways:

#### 1. **Limit firearm accumulation and reduce theft / diversion risks**

Victoria currently has no overall numerical cap on firearms per licence holder. The submission argues that unrestricted accumulation increases theft, diversion, and misuse risks and creates unnecessary enforcement burdens. It recommends adopting the New South Wales approach of capping firearms at four per person, with limited exemptions allowing primary producers and specified sporting shooters to possess up to ten.

#### 2. **Modernise firearm categories to address emerging technologies and workarounds**

The submission highlights firearm types designed to circumvent restrictions on semi-automatic and automatic firearms, noting contemporary classifications for "assisted repeating action" and "straight pull repeating action" firearms. It recommends restricting these to Category C or D only and prohibiting semi-automatic handguns subject to narrow exemptions for Olympic-level shooters.

#### 3. **Strengthen licensing integrity and monitoring across the lifecycle**

To improve decision-making quality and risk management, the submission recommends enabling Commonwealth intelligence sharing (including participation in AusCheck), strengthening physical and mental health assessment models, and reducing licence duration to a maximum of two years to ensure suitability is reviewed more frequently. It also supports reforms to protect sensitive intelligence in review processes by restricting VCAT access and strengthening internal review mechanisms, including reinstating a specialist appeals body.

#### 4. **Remove unlicensed shooting pathways that bypass "genuine reason / need"**

Unlicensed "come and try" shooting is currently permitted in Victoria, including in contexts such as promotional events. The submission argues this undermines the intent of the licensing framework and delegates screening responsibility to entities with commercial incentives. It recommends requiring Firearm Registry assessment prior to any unlicensed firearm use at ranges or clubs.

#### 5. **Fully align Victoria with the intent of the NFA regarding children**

The submission asserts that allowing children under 18 to use firearms is inconsistent with public safety objectives and contends Victoria should be the first jurisdiction to uphold the NFA intent by prohibiting children from using, possessing, or handling firearms.

**6. Address illicit and privately made firearms, including 3D printing**

The submission supports recent action targeting 3D firearm blueprint files and urges Victoria to collaborate nationally on regulatory and enforcement measures to disrupt privately made firearms, including exploring preventative software and printer-side controls.

**7. Improve integrity settings in hunting authorities, storage, FDV, and governance**

The submission recommends auditing and reforming “Authority to Hunt” arrangements in light of misuse identified interstate; strengthening probity requirements for shooting club executives; improving management of firearms from deceased estates; and investigating centralised storage options for non-occupational firearms - particularly in metropolitan areas. It also highlights the risks of firearms in family and domestic violence (including coercion and intimidation) and calls for coordinated work to reduce FDV-related firearm harm. Finally, it recommends measures to protect policy integrity (including restricting political donations from the firearms industry), reforming the Victorian Firearms Consultation Committee to ensure more equitable representation, and improving transparency through annual reporting on compliance with the National Firearms Agreement.

## The Alannah & Madeline Foundation

The safety of children and young people is why we are here. Our child-rights framework informs everything we do.

It drives our mission to see all jurisdictions compliant with the Australian National Firearms Agreement through the Australian Gun Safety Alliance (AGSA).

It sees us advocate for the rights of children and young people to be upheld online and offline, including by governments and digital platforms, and for optimal safety standards to be built into all digital spaces and devices.

And it means advocating for children to be formally recognised as victims of crime.

We believe the needs of children should always be part of government policy and that all government decision-making should consider the best interests of the child, first and always.

We believe that the voices of children and young people should be actively sought out and prioritised whenever decisions are being made that affect them. It is their right. And our ongoing mission to make it happen.

A letter of support from our Founder, Walter Mikac AM, is included with this submission. Walter has experienced firearm violence at its worst and has been a passionate advocate for firearm safety since supporting Prime Minister Howard with the gun reforms in 1996.

## The Australian Gun Safety Alliance

The Australian Gun Safety Alliance (AGSA) is a broad coalition of voices representing the interests of the community in ensuring that we maintain vigilance on issues of gun safety.

AGSA members are from the public health, medical, hospital, first responder, union, and children's services sectors along with faith organisations and those involved with preventing family violence. All members are shown on the AGSA website.

AGSA is not politically aligned and receives no corporate or individual donations. It is funded by modest philanthropic donations and in-kind services by members.

AGSA understands that the majority of gun owners in Australia are law abiding, responsible people who are not criminals. However, we believe that all governments must do everything in their power to avoid a slide towards an American culture of gun entitlement. They should also uphold their public commitment to the National Firearms Agreement. Finally, governments have a responsibility to all their constituents when it comes to the management of firearms - not just those with a self-interest in the firearm industry.

We are strong advocates for the preamble of the National Firearms Agreement which states clearly that the use and possession of a firearm is a privilege and that the overriding need to ensure public safety should dictate the regulation of firearms.

The convenience or commercial interests of firearm owners, manufacturers, importers and retailers should never take precedent over community safety.

Many of the AGSA members are making their own submissions to the Rapid Review while supporting the detail of our submission.

There are some letters of support from AGSA members attached in the Appendix.

## Current legislative framework

At this time of reform, it is incumbent upon us all, including governments, to consider the first principle of firearm use and possession in Australia. Our [National Firearms Agreement](#), last agreed to by all jurisdictions in 2017, has a very clear preamble that establishes the principle that **firearm use and possession in Australia is a privilege conditional upon public safety**.

The Victorian *Firearms Act 1996* has a clear overriding Purpose:

- a. to give effect to the principle that the possession, carriage, use, acquisition and disposal of firearms are **conditional on the need to ensure public safety and peace**.

Assuming that the Purpose of the Act is not being changed, all other considerations about the rights and wrongs of particular initiatives, the convenience or disruption to existing firearm owners, the calls from safety organisations like ours, or efforts to maintain the status quo, are legally required to be framed around the test of public safety.

With this context in mind, the Foundation is pleased that the Terms of Reference of this Rapid Review states clearly that **the focus is on identifying opportunities to strengthen firearms laws**.

At times like these, the Foundation draws on the strength of political leaders who acted following the Port Arthur tragedy. Prime Minister John Howard led those reforms with determination. One of his most memorable speeches was delivered before a disenchanted crowd in Sale, Victoria, when he stated:

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*...there come occasions for any Government to take decisions which can only be effectively implemented in the interests of the overall national good.*

*If they involve some disproportionate inconvenience and some disproportionate deprivation for one section of the community, I'm sorry about that.*

*But there is no other way that we can achieve the objectives. And it is always, my friends, it is always the responsibility of a national Government to weigh up the gains and to set them against the losses.*

*And the gains to the Australian community of there being fewer weapons of great destruction in the community are, in my view and in the view of all governments throughout Australia very, very significant indeed and that is why we have taken the decision.*

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**PM John Howard - Gun Rally, Sale, Victoria 16 June 1996**

Furthermore, the Foundation's Founder Walter Mikac AM [exchanged letters](#) with Prime Minister Howard following the Port Arthur tragedy. When uncertainty arose regarding the National Firearms Agreement, he sent a letter that was read to a meeting of First Ministers. In part it read:

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*I implore you to protect your families, friends & every Australian from this ever happening again. Be strong & act now.*

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**Walter Mikac AM, 17 July 1996**

The Foundation, along with other firearm safety advocates is routinely asked to provide evidence justifying stronger gun reforms. It is an unimpeachable fact that firearms are harmful, and that increased firearm prevalence invariably leads to increased harm. Reducing the number of firearms in the community directly limits the means by which an individual may cause injury or death, to themselves and to others.

Should this review require empirical evidence linking firearm prevalence, there exists an extensive body of research in the United States demonstrating this association,

The current firearm [death rate in the USA](#) is approximately 14 deaths per 100,000 people. Whereas in Australia the [rate is slightly less](#) than 1.0 per 100,000 people. The [United States records nearly 47,000 firearm-related deaths per annum](#).

In the US, [states with the highest gun](#) death are typically those in the South or Mountain West, where gun laws are weaker and firearm ownership is higher. By contrast, gun death rates are significantly lower in the Northeast, where gun violence prevention laws are stronger. An editorial in the [British Medical Journal](#) summarised experiences across multiple states and confirmed that jurisdictions with tighter firearm regulation experience fewer firearm injuries and deaths. Similarly, a [National Bureau of Economic Research 2001 paper](#) found unequivocally that “fewer guns mean fewer gun homicides.”

[Gun-related suicides also represent the majority of firearms deaths in the United States](#). In 2023, 58% of all gun-related deaths (27,300) were suicides, compared with 38% (17,927) that were homicides. Tragically, for the [third consecutive year](#), firearms killed more children and teenagers, aged 1 to 17, than any other cause - including car crashes and cancer.

It is therefore impossible to reconcile how a proliferation of firearms in the community aligns with the Victorian Government’s commitments to “[reduce access to means for suicide](#)” and ensure “[the prevalence of violence is significantly reduced](#)”.

In addition to direct harm, another significant but less recognised risk is theft. Recent data from the [Australia Institute](#) indicates more than 9,000 firearms were stolen from 2020 to 2024 - or one every four hours. While data on the relationship between the number of firearms in the home and theft is limited, the incentive for criminal targeting is clear when multiple weapons are stored in a single premises. [Interviews with persons convicted](#) of serious gun-related crimes demonstrate that theft is routine practise for criminals – “*every farmer has a shotgun*”.

The relevant question, therefore, is not whether fewer firearms enhance safety - the evidence overwhelmingly affirms that. Rather, it is whether allowing individuals to possess 10, 20, 50, or an unrestricted number of firearms enhances public safety. There is no evidence to suggest that is a remote possibility.

More broadly, there is compelling evidence across multiple policy domains that reducing access to harmful products reduces harm. This foundational principle of public health - harm reduction - underpins effective regulation of alcohol, gambling, tobacco, illicit drugs, road safety measures and occupational health and safety. Fewer pokies reduce gambling harm; reduced access to cigarettes reduces smoking rates - analogous logic applies to firearms.

A recent example of a community-wide harm reduction policy is the Commonwealth’s legislation prohibiting social media accounts for children under 16. The Prime Minister stated, “*Our social media ban is about providing greater peace of mind for Australian parents*.” In 2024, [Premier Allen when considering the measures said](#) “*It’s absolutely time for change. There are benefits to social media, but the harm outweighs the good*”.

On 13 November 2025, Police Minister Carbinis [introduced](#) the *Justice Legislation Amendment (Police and Other Matters) Bill 2025* to the Victorian Parliament, including measures to prohibit 3D firearm blueprint files. He emphasised that such reforms will “... *contribute to community safety by streamlining and expanding the powers police have to get weapons off our streets*.”

These examples reflect an understanding that effective public safety policy focuses on systems-level change and the wellbeing of the entire community. Such reforms cannot be constrained by the argument frequently advanced by lobbyists “*I am a law-abiding person, leave me alone and trust me to do the right thing*”. Public policy cannot rely on individual assurances, otherwise similar reasoning could be applied - illogically and dangerously - to road safety, tobacco control, drug regulation or gambling policy.

Although only 5-6% of Australians legally own firearms, the risks associated with firearms affect the entire population. This must remain central to the policy deliberation,

Finally, the firearm industry has been widely [recognised](#) as a Commercial Determinant of Health, akin to gambling and alcohol industries. Its influence on policymaking, research agendas and the public discourse can have harmful effects on population health. It is there essential that in identifying opportunities to strengthen Victoria's firearms laws, harm-reduction principles prevail over commercial interests.

## Question 1: Number of firearms that can be held by an individual

Victoria currently does not impose an overall numerical cap on the number of firearms that may be held by a licensed individual. Other jurisdictions, including New South Wales, have introduced limits following National Cabinet reforms.

- How could a numerical cap on the number of firearms a licensed individual can hold impact legal firearms use?
- What issues or unintended consequences should be considered when considering a numerical cap?
- How could a numerical cap on firearms strengthen community safety in Victoria?

We respectfully point out that the first question is not consistent with the focus of the Rapid Review which is to **identify opportunities to strengthen firearms laws**. Accordingly, the final question - centred on community safety - should be the primary focus.

### 1.1 Limit the number of firearms per individual

The accumulation of firearms by individuals increases the risk of theft, diversion, and misuse. Ownership should be limited to the minimum number necessary for the licensed purpose. Western Australia has introduced a maximum of five firearms per licence, with an exemption allowing primary producers to own up to ten. Recent reforms in New South Wales have adopted a similar “4 and 10” structure.

In Victoria the [average licence holder](#) has 4.1 firearms. There is no reason to believe that ownership patterns differ significantly from those in New South Wales. [New South Wales Police data](#) shows that at least 75 licensed firearm owners hold more than 100 registered firearms, with several individuals possessing nearly 300. (These people are not dealers or collectors.)

A range of public benefits arise from limiting the number of firearms that an individual may own. These include:

#### 1.1.1 Reduced risk of theft and diversion

The more firearms stored in a single home, the greater the opportunity for theft, which is the [primary pathway](#) through which firearms enter the illicit market.

Recent [evidence indicates](#) that a firearm is stolen in Australia every four hours. The last analysis by the [Australian Institute of Criminology in 2018](#) found that most stolen firearms were Category A and B weapons; Category C and D firearms comprised less than one percent and Category H firearms between five and seven percent.

Nine in ten theft incidents were burglaries, with most theft locations described as secure. However, a fifth of residential and business thefts, and more than a third of thefts from vehicles, were enabled by unlocked access points.

A quarter of all stolen firearms were taken from non-compliant receptacles. Only 14% were recovered.

Reducing the overall number of firearms in the community inevitably reduces the pool available to the illicit market. It also lowers the likelihood that a single theft will result in multiple firearms being stolen and makes compliant and secure storage easier for legal owners.

#### 1.1.2 Reduced lethal capacity in the community

Currently in Victoria, licensed firearm owners may possess an unlimited number of firearms, in effect enabling the creation of private arsenals.

The principle of harm reduction underpins our response to this Review. Limits on the number of firearms reduces opportunities for misuse, including in situations involving domestic violence,

mental health crises or impulsive behaviours or mass shooting incidents. They also reduce opportunities for self-harm, which is still, by far the greatest cause of firearm related deaths.

#### 1.1.3 Enables genuine purpose-based regulation

The Victorian firearm licence framework is intended to ensure that applicants have both a genuine reason and a genuine need for a firearm. However, the absence of limits has enabled some individuals to amass extensive collections with minimal regulatory intervention.

A numerical cap would better support both the Registry and firearm owners in applying the genuine purpose test consistently and rigorously.

#### 1.1.4 Lower enforcement and regulatory burden

Large private collections create significant operational challenges for police and regulators, including:

- increased storage inspections
- more serial numbers and registrations to monitor
- greater complexity during compliance checks, licence reviews, and family-violence related interventions.

Capping firearm numbers would allow resources to be directed toward higher-risk cases rather than managing large, low-justification collections.

#### 1.1.5 Supports consistency with harm-reduction principles

Government regulation of other potentially harmful products - such as alcohol, tobacco and gambling - follows a harm-reduction framework: reducing access reduces risk.

Applying the same principle to firearms acknowledges their unique lethality. Reducing the number of firearms aligns regulation with established public-health practices and reinforces Victoria's commitment to prevention-focused policy.

#### 1.1.6 Increased public confidence in firearms regulation

Clear, reasonable limits on firearms ownership help the public understand:

- that firearms are regulated primarily for safety
- that unchecked accumulation is not permitted
- that authorities actively seek to prevent the formation of private stockpiles.

It must be emphasised that none of the recommendations in this section prevent legal firearm owners from pursuing their recreation activity, occupation or farming needs. These recommendations prioritise the public interest above the commercial interest of a small sector.

#### 1.1.7 Impact of limiting the number of firearms

In addition to the extensive United States research demonstrating a clear and positive relationship between firearm prevalence and firearm-related injury and death, Western Australia is the only Australian jurisdiction with data indicating the impact of restricting firearm numbers.

Recently Western Australia [reported](#) that 83,764 firearms were surrendered through its buyback program, representing a 24% reduction in registered firearms over two years.

Through the [Victoria Police 2024-25 Annual Report](#) Victoria identified 976,217 registered firearms held by 233,377 licensed holders, equating to 4.18 guns per license holder. If Victoria were to achieve a reduction proportionate to Western Australia's, approximately 234,292 firearms would

be removed - from predominately suburban areas. Importantly, this could be achieved without preventing any licensed individual from continuing to use firearms for legitimate purposes.

**Recommendation 1:**

**That the Victorian Government adopt the New South Wales precedent of limiting firearm ownership to four firearms per individual, with exemptions allowing primary producers and specified sporting shooters to possess up to ten firearms.**

## Question 2: Existing firearms categories and whether these remain fit for purpose having regard to developments in firearms manufacture and emerging technologies

Victoria's firearms categories were developed prior to recent advances in firearms manufacture, modular design and emerging technologies. The Rapid Review is considering whether existing categories remain fit for purpose.

- To what extent do existing firearms categories remain fit for purpose in addressing contemporary risks, including those arising from advances in firearms design and emerging technologies?
- Are there any gaps, inconsistencies or emerging risks within the current categorisation framework that should be addressed?
- What are the opportunities to modernise firearms categories, so they remain clear, enforceable and nationally consistent, while supporting legal firearms use and strengthening community safety?

The Foundation has long called on governments to address the proliferation of firearms designed specifically to circumvent Australia's restrictions on semi-automatic and automatic firearms.

While the technical description of firearms is not our area of expertise, we understand they are commonly referred to as button-release or lever-release, pump-action and straight-pull rifles and shotguns. In the recent [Combating Antisemitism, Hate and Extremism \(Firearms and Customs Laws\) Bill 2026](#) these firearms are classified as **assisted repeating action** and **straight pull repeating action** firearms.

We believe that it was weapons of this nature that were used in the Bondi shooting.

### Recommendation 2:

**That the Victorian Government restrict *assisted repeating action* and *straight-pull repeating action* (or their technical equivalent) to Category C or D licenses only.**

### Recommendation 3:

**That the Victorian Government prohibit semi-automatic handguns, with specific exemptions for Olympic-level sporting shooters.**

### Recommendation 4:

**That the Victorian Government enter into an agreement with the Commonwealth to undertake a buy-back of restricted, prohibited and unwanted firearms commencing 1 July 2026.**

### Question 3: Existing licensing scheme, including license types, and any additional restrictions or requirements that should be in place, including citizenship and residency requirements

Again, the Foundation believes the focus should remain on identifying opportunities to strengthen the firearm licensing scheme to improve public safety.

#### 3.1 Intelligence sharing

The Commonwealth has announced the opportunity for firearm registries to enhance background checks by using the National AusCheck system. It is our understanding that Victoria may need to amend its legislation to enable participation in this process, and we strongly recommend that such changes be made.

##### Recommendation 5:

**That the Victorian Government modifies legislation as required to facilitate intelligence sharing with the Commonwealth.**

#### 3.2 Physical and mental checks

We believe Victoria should adopt routine physical and mental health assessment as part of its fit-and-proper testing. Various models exist: Western Australia requires a mandatory check, while New South Wales holds discretionary power to request an assessment.

Self-harm remains the leading cause of firearm-related death in Victoria. While no mental health assessment can identify all individuals at risk, routine screening would support the Firearm Registry in making more informed decisions about a person's suitability to hold a firearm license.

These checks should be conducted for every firearm license application and renewal.

##### Recommendation 6:

**That Victoria Police consult with appropriate health professionals to determine the most effective approach to strengthen physical and mental health checks.**

#### 3.3 Length of license

While Victoria currently complies with the National Firearms Agreement, which sets a five-year maximum license duration, there is an opportunity to align with the recent New South Wales reforms and reduce to the maximum period to two years.

With the introduction of the National Firearm Register and improved digitisation of firearms information, there is scope – similar to VicRoads and other licencing systems - to enhance self-service functions capabilities and reduce administrative burden on the Firearm Registry.

Given that individuals may experience significant changes - such as mental health decline or violent radicalisation - over relatively short periods of time, reviews of license suitability for access to a lethal weapon should occur more frequently than once every five years.

##### Recommendation 7:

**That Victoria introduces a maximum firearm license duration of two years.**

### 3.4 Decision reviews

New South Wales has recently strengthened its internal review processes but has removed access to the New South Wales Civil and Administration Tribunal for reviews of firearm-registry decisions. This change ensures that New South Wales Police are not required to disclose sensitive intelligence on which they rely when determining firearm licenses eligibility and access.

#### Recommendation 8:

**That Victoria restricts access to VCAT for reviews of firearm-license and related administrative decisions, and that Victoria Police strengthen the internal review process.**

### 3.5 Unlicensed shooting

Unlicensed shooting is currently permitted in Victoria at gun clubs and shooting ranges. [“Come and Try”](#) events are widely promoted, including for [Bucks & Hens](#) events.

This practice circumvents the *Firearms Act 1996* requirement for a genuine reason and genuine need to possess and use a firearm. It undermines the principle - embedded in both Victorian law and the National Firearms Agreement - that firearm use and possession are privileges conditional on public safety.

In 2021 the NSW State Coroner, Magistrate Teresa O’Sullivan conducted a [comprehensive investigation](#) into the tragic deaths of Jack and Jennifer Edwards who were killed by their father John Edwards. The Coroner made several recommendations regarding the management of shooting ranges, and particularly unlicensed “try shooting” access.

Specifically,

*Recommendation 20: That the New South Wales Government take steps to revoke the use of the P650 form (which currently allows an unlicensed person to undergo firearms training without involvement or vetting by the Firearms Registry), with the view to amending cl. 129 of the Firearms Regulation 2017 and implementing an alternative scheme which provides for adequate verification of information and oversight by the Firearms Registry.*

While these are recommendations, they are highly relevant to Victoria. Currently, all Victorian shooting clubs and ranges advertise and permit unlicensed firearm use, including by children.

This practice is enabled under Section 54(1A) of the Victorian *Firearms Act 1996* for handguns and Items 5 and 5B in Schedule 3 for longarms, effectively bypassing Victorian Police’s prescribed firearm--licensing framework.

Consequently:

- a. It is inconsistent with the purpose of the Firearm Act to ensure public safety, and there is no demonstrated public benefit to permit unlicensed firearm use.
- b. Screening of unlicensed individuals is entirely delegated to shooting clubs or ranges, which have a commercial interest in recruiting new members.
- c. Clubs have argued that unlicensed-use programs are essential for commercial viability. This conflict of interest between commercial interest and public safety is precisely why screening should not remain their responsibility.
- d. At [least eight deaths occurred at shooting ranges](#) between 2002-2021 in Australia, and no data exists on injuries or near misses.
- e. There is no transparency regarding how many individuals have been refused by shooting clubs or ranges due to concerning behaviour or potential risk.
- f. There is also no data on how many individuals who complete the self-assessment form have been rejected for a firearms licence.

- g. In 2018 an official from the Sporting Shooters Association of Australia (SSAA) who was suspended after [raising safety concerns](#) at a Sydney firing range stated it is “only a matter of time” before another mass shooting. He reported aggressive behaviour at a “try shooting” event.
- h. In July 2023, a Perth man was [injured at a shooting range](#) in Sawyers Valley.
- i. In December 2021 two men [were taken to hospital](#) with gunshot wounds to their legs after what authorities believe was an accidental discharge at a shooting range.

These incidents reinforce our concern. We doubt that the Firearms Act ever anticipated that any unlicensed person could walk into a shooting range or club for a bucks night event, complete a self-assessment and be permitted to use a firearm under the supervision of someone they have never met - someone, who in many cases, [is a volunteer according](#) to the SSAA WA.

The New South Wales Government in its most recent gun-reform package, removed the ability for unlicensed individuals to engage in shooting activities on the basis of a self-declaration that they are a fit and proper person to use a firearm. The New South Wales Firearm Registry is now developing a digital system to “fast-track” pre-approval processes, which will require individuals to apply in advance and will remove the responsibility from shooting clubs for authorising unlicensed shooting.

While the overall risk may be low, we have demonstrated that the risk is nevertheless real. We also have no access to data regarding unreported injuries or near miss incidents, which further underscores the need for precautionary reform.

#### Recommendation 9:

**That Victoria follows a similar path to New South Wales by removing the ability for an unlicensed individual to use firearms for any purpose at a gun club or shooting range until they have been assessed by the Firearm Registry. This may require enhanced digitalisation.**

### 3.6 Children

All jurisdictions, including Victoria continue to contravene the National Firearms Agreement by allowing children under 18 to legally use firearms. This is fundamentally inconsistent with the stated objective of the Firearm Act 1996 (Vic) to ensure public safety.

The current Act provides no justification or explanation for permitting 12-year-old children in Victoria to lawfully use a firearm, nor how such permission could be considered consistent with the primary purpose of the legislation, which is to protect public safety. The firearm industry has advanced spurious arguments suggesting that handling a firearm equips children with otherwise unattainable life skills – based on no such evidence. It has also been claimed that farmers rely on children to euthanise stock - overlooking the explicit legal requirement that any such activity must occur under direct supervision of a licensed firearm owner, presumably one that could carry out whatever duty they were expecting their child to undertake.

For context, a 12-year-old cannot legally drive a motor vehicle, even under supervision, and a 15-year-old is prohibited from holding a Facebook account. It is therefore difficult to conceive how it could be in the public interest to allow children to legally use firearms.

Furthermore, the use of firearms by children in an organisational setting - such as a shooting range - would raise serious concerns under [Victoria's Child Safe Standards](#), including *Standard 9: Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed*.

In addition, there is another compelling public-health rationale for limiting children's access to firearms. Health departments across the country advise that children should not attend shooting ranges, which are well-established sources of lead contamination.

Investigations into [lead contamination](#) at shooting ranges concluded that “*It is the norm, rather than the exception, that shooting ranges are contaminated with lead.*”

The Western Australia [Health Department](#) advises that individuals who use firearms, handle ammunition or visit shooting ranges are at increased risk of lead exposure. It is recommended that children do not attend shooting ranges and firearm users take precautions to ensure their clothes and skin are free from any lead particles before hugging children or handling toys.

Similarly, the South Australia [Health Department](#) explicitly recommends “*Avoid taking young children to shooting ranges.*” An [international review](#) found “*Women and children are among recreational shooters at special risk*” and “*Thus firing ranges, regardless of type and user classification, currently constitute a significant and unmanaged public health problem.*”

Even the [Sporting Shooters Association of Australia](#) agrees that “*A variety of potential contamination risks exists at sports shooting ranges - the most concerning for human health and environment is lead from the spent projectiles.*”

Once again, public safety must guide firearm policy in Victoria, and the significant issue of lead contamination must be expressly considered.

**Recommendation 10:**

**That Victoria be the first jurisdiction to fully comply with the National Firearms Agreement by upholding the intent that children under eighteen must not legally use, possess or handle a firearm.**

**3.7 Fingerprints for the most lethal firearm ownership**

We understand that recent New South Wales reforms include the requirement for individuals holding a Category D or Category H licence to provide their fingerprints to the Firearms Registry.

**Recommendation 11:**

**That Victoria Police collect fingerprints from any person holding a Category D or Category H licence.**

**3.8 Twenty-eight day cooling off period**

The 2017 *National Firearms Agreement* requires all jurisdictions to insurer a minimum 28-day cooling-off period for permits to acquire firearms.

With continuous improvement in the digitisation of firearm registries, it is anticipated that the processing time for a Permit To Acquire will decrease; however, this should not replace the important safeguard provided by a mandatory waiting period.

**Recommendation 12:**

**That Victoria Police reinstate a mandatory 28-day cooling-off period for all Permits to Acquire.**

**Question 4: Appropriate duration of different licence types and options for strengthening application and renewal requirements and ongoing monitoring of licences during their lifecycle.**

Addressed in the section above.

**Question 5: Strengthening of laws in relation to the management of illicit firearms****5.1 3D and privately made firearms**

The Foundation understands that the Victorian Government has recently introduced legislation prohibiting the possession and distribution of 3D-printed firearm blueprints.

Police briefings provided to us indicate that police resources and intelligence capabilities remain among the most effective tools for disrupting the production of privately made firearms and for detecting illicit firearms more broadly.

With respect to the 3D printing of firearms, the Victorian Government should work collaboratively with all jurisdictions to explore regulatory options for 3D printers capable of producing firearms or firearm components. This may include legislating that such printers must incorporate native software that can identify and prohibit the printing of firearms and firearm parts or insist they require that appropriate preventative software be installed.

We understand that such software is already available, and its adoption should be actively pursued.

As with all matters related to firearm regulation, public safety must remain the paramount consideration. While we acknowledge concerns raised by some in the firearm industry regarding the need to print replacements parts, a permit system or exemption system could readily accommodate legitimate requirements without compromising community safety.

We also understand there is a national police task force is currently examining the issue, and we encourage the Victorian Government to fully support its work and react promptly to any of its recommendations.

**Recommendation 13:**

**That Victoria collaborates with all jurisdictions to strengthen regulatory and enforcement measures aimed at disrupting the 3D printing of privately made firearms.**

## Question 6: Regulatory treatment of imitation firearms, firearms accessories and related items

The Foundation is not in a position to comment in detail on the role that imitation firearms, firearm accessories and related items play in relation to public safety. However, we encourage the Victorian Government to consider any opportunity to strengthen regulations of these items, where doing so will enhance community safety.

In a related area, we hold deep concerns about proposals to deregulate silencers. We strongly encourage the Victorian Government to maintain a firm position against the broader availability of silencers, retaining access only through the current permit system for professional or contract shooters.

## Question 7: Appropriate use of criminal intelligence in firearms licensing decision making and the handling of intelligence information in licensing reviews

### 7.1 Firearm licence decisions

We acknowledge that the Foundation is not well placed to comment on the operational use of criminal intelligence in current firearm licensing decision making. However, we do hold strong confidence in the Victorian Police to make decisions in the interest of public safety.

We have previously recommended that the Victorian Government make the appropriate legislative amendments necessary to ensure that the Victorian Police have access to intelligence made available by the Commonwealth, including participating in the AusCheck background checking process.

We also encourage the Victorian Government to adopt the principle that in context of firearms licencing, a false positive arising from a background check is preferable to a false negative. On matters of fairness, procedural transparency, privacy and legal robustness, we believe the Victorian community expects the police decision making to adopt a tolerance level that errs on the side of public safety.

We have further recommended that the Victorian Government follow the example of New South Wales model by removing the ability for firearm licencing decisions to be appealed at VCAT. This is essential to protect sensitive intelligence information and to preserve the integrity of police decision making. This should include reinstating the Firearms Appeals Committee rather than subsuming that function into VCAT as previously proposed.

#### Recommendation 14:

**That Victoria reinstates the Firearms Appeals Committee as the final appeal mechanism.**

## Question 8: Information sharing arrangements between agencies to strengthen licensing regimes

The Foundation is not well placed to comment on the information-sharing process currently operating in relation to firearms licensing and enforcement.

However, we are strong advocates of the National Firearms Register and encourage the Victorian Government to move as quickly as possible to update its systems to align with the Register.

Any new system should also include self-service functionality to support and operationalise several of the recommendations outlined in this submission.

## Question 9: Other associated matters required to promote public safety

### 9.1 Audit Authority to Hunt

Most firearm license applicants identify their genuine reason for their firearm license by obtaining an "Authority to Hunt" from a landowner.

Recent reviews in New South Wales and Western Australia have revealed widespread misuse of this process, with landowners prosecuted for selling or duplicating authorities. In some cases, relatively small landowners had issued authorities to hunt to thousands of individuals. The system lacks any meaningful validation, and shooters may use an authority for one property to shoot on any property in Victoria.

In Western Australia, all authorities were cancelled and replaced with a set of guidelines developed using data from the Department of Primary Industries. These guidelines determine both the type of pests present on a property and the number of authorities a landowner can issue. Responsibility for managing these authorities now rests with the landowner rather than the hunter whose license remains valid for five years.

**Recommendation 15:**

**That Victoria Police audit the Authority to Hunt system, consult with Western Australia and New South Wales regarding their data and implement a revised system that provides strong regulation and oversight of Authorities to Hunt.**

**9.2** Probity checks for shooting club executives

**Recommendation 16:**

**That any shooting club executive be required to undergo and pass a probity assessment and fit-and-proper person test prior to assuming their position.**

**9.3** Deceased estates

**Recommendation 17:**

**That Victoria review and strengthen processes governing the management of firearms arising from deceased estates.**

**9.4** Review metropolitan home storage for non-occupational firearms

Recent evidence from [The Australia Institute](#) shows that approximately half of all firearms in Australia are stored in metropolitan areas or large regional towns - amounting to over 2 million firearms stored in suburban streets.

Firearms are lethal weapons, not household items. There is a reasonable case that firearms held for non-occupational purposes should not be stored in metropolitan homes. Firearms used for sporting or club purposes could instead be stored in accredited club armouries with professional security, controlled access, and auditable custody records. Where storage on a residential property is genuinely required, an electronic security-monitoring system should be mandated.

It is noteworthy that Victorian Police members must secure their firearms within their station, yet members of the public are permitted to transport and store firearms - including multiple firearms - in suburban residential areas.

**Recommendation 18:**

**That Victoria collaborates with other jurisdictions to investigate options for the centralisation of residential-based firearms in secure facilities.**

### 9.5 Prevent firearms use in Family and Domestic Violence (FDV)

Firearms remain the third most common method of death in family and domestic violence, accounting for approximately 11% of FDV fatalities. Firearms are also frequently used as tools of coercion and intimidation in family and domestic violence, including when they remain in storage. Preventing this harm requires systemic reform.

The recommendations arising from the Edwards Coronial Inquest in New South Wales provide a strong foundation for nationally consistent reform and should be considered by the Victorian Government.

Further consultation with FDV stakeholders should inform the development of a comprehensive plan to reduce firearm related harm with the FDV context.

#### Recommendation 19:

**That Victoria collaborates with other jurisdictions and relevant stakeholders to investigate and develop a plan to reduce firearm related harm in the FDV sector.**

### 9.6 Protect political integrity

Political donations from the firearms industry should be prohibited, consistent with restrictions applied to other high-risk industries. A 2019 report by the Australia Institute found the Shooting Industry Foundation of Australia (SIFA) - the peak body for Australia's five largest firearms suppliers - spends on a per capital basis, amounts on political campaigning comparable to those spent by the National Rifle Association (NRA) in the United States.

Two prominent examples include the "FLICK'EM" campaign during the 2017 Queensland state election and the "Not. Happy. Dan." campaign during the 2018 Victorian state election.

#### Recommendation 20:

**That Victoria prohibits political donations from the firearm industry or related parties.**

### 9.7 Reform the Victorian Firearms Consultation Committee (VFCC)

The current VFCC is an advisory body intended to broadly represent those interested in, concerned with, or relevant to the regulation of firearms in Victoria. Its primary role is to provide advice to the Minister. The Foundation's Advocacy Advisor on firearms safety, Mr Stephen Bendle is a member of the Committee.

The representation is heavily weighted to the firearm industry using a traditional paradigm that firearm laws are for the administration of firearms rather than focused on public safety.

The Committee currently includes:

- staff from the Ministers Office
- staff from the Department of Justice and Community Safety
- Victoria Police representatives
- 1 Academic
- 13 representatives from firearm industry groups
- 1 firearm safety advocate.

The Minister's office recently rejected a request from an additional firearm safety advocate on the basis that such views were already represented. However, the same reasoning does not appear to be applied to firearm industry representatives.

When considering the Terms of Reference, many sectors, practitioners and organisations have a legitimate interest in firearms regulation in Victoria. These include public health, domestic and family violence, animal welfare, outdoor recreation, medical specialists, mental health, first responders, victims and survivors of firearm violence. Broader representation would also reflect the fact that some 95% of the Victorian population are not firearm users.

We reiterate gun reform is not a merely a matter of administrative efficiency. It is fundamentally a matter of public health and harm reduction.

**Recommendation 21:**

**That Victoria reconstitutes the Victorian Firearms Consultation Committee to ensure more equitable representation of those who are *interested in, concerned with or relevant to* the regulation of firearms in Victoria.**

**9.8 Reporting on compliance with the National Firearms Agreement**

All jurisdictions should be required to report at least annually on their compliance with the new 2026 *National Firearms Agreement*.

**Recommendation 22:**

**That Victoria publishes an annual report outlining its compliance with the National Firearms Agreement.**

## Letters of support



Mr Ken Ley AO APM  
Rapid Review of Firearms Laws in Victoria

Dear Mr Ley,

**Endorsement of the Australian Gun Safety Alliance**

The Public Health Association of Australia (PHAA) is a founding and active member of the Australian Gun Safety Alliance. Our organisation is the leading body for public health and harm prevention in Australia, and as such we understand the need for the strong management of firearms in Australia and for the focus always to be on public safety.

We fully support the principles of the Alliance which are to:

- Ensure a safer community for Australian children
- Have all jurisdictions comply with the National Firearms Agreement
- Increase public awareness of the poor compliance by all Governments
- Hold governments to account for their non-compliance
- Contribute to a balanced public conversation about the importance of a strong gun safety framework
- Provide informed advice to governments on matters relating to a safer community regarding the use and possession of firearms.

We understand that the Victorian Government is undertaking a Rapid Review of the state's firearm legislation with a focus "on identifying opportunities to strengthen firearms laws". It is unfortunate that the renewed focus on our firearm laws has been predicated upon the recent Bondi tragedy.

PHAA will not be making a separate submission to the Review given the timeline, however we have full confidence in the AGSA representatives to present our views.

We wish you well with the Rapid Review, and hope the views of the Australian Gun Safety Alliance informs your Review, and balances the no doubt vigorous efforts of the firearms lobby to constrain a new round of safety-focussed regulation.

Yours sincerely



Adj/Prof Terry Stevin  
Chief Executive Officer



Australian Health Promotion Association  
38 Surrey Road | Keswick SA 5035  
admin@healthpromotion.org.au  
ABN: 443 730 807 90 | ACN: 116 231 595

**Australian Health Promotion Association**  
**Letter of Support – Australian Gun Safety Alliance**

25 January 2026

Dear Mr Lay,

The Australian Health Promotion Association (AHPA) is a long-standing advocate for policies, systems and environments that protect and improve the health and wellbeing of all people in Australia. AHPA is a founding member and proud supporter of the Australian Gun Safety Alliance (AGSA), recognising the critical role that strong firearm regulation plays in safeguarding public health and preventing avoidable harm.

While it is deeply unfortunate that renewed scrutiny of firearm legislation has been prompted by the recent tragedy in Bondi, AHPA welcomes the Victorian Government's Rapid Review of firearm laws and its stated intention to identify opportunities to strengthen existing frameworks. Preventing violence and injury is a core health promotion priority, and evidence consistently demonstrates that robust firearm regulation contributes to safer, healthier communities.

Given the very short timeframe for consultation, AHPA will not be lodging a separate submission. However, we fully support the principles and priorities articulated by the Australian Gun Safety Alliance, including efforts to:

- Ensure safer communities for all Australians, including children
- Support full compliance with the National Firearms Agreement across jurisdictions
- Increase community awareness of gaps in compliance and implementation
- Hold governments accountable for lapses in adherence to agreed national standards
- Contribute to balanced, evidence-informed public dialogue on firearm safety
- Provide informed advice to governments on creating safer environments regarding firearm use, storage and possession

Firearm safety is important to AHPA because violence prevention, injury prevention, and the creation of safe, supportive environments are foundational elements of effective health promotion. Firearm-related harm, whether intentional or unintentional, has wide-ranging impacts on mental wellbeing, family stability, community safety and the broader determinants of health. Strengthening firearm regulation is therefore not only a justice and safety issue - it is a vital public health measure.

[www.healthpromotion.org.au](http://www.healthpromotion.org.au)

AHPA is a registered trademark of the Australian Health Promotion Association



Australian Health Promotion Association  
38 Surrey Road | Keswick SA 5035  
admin@healthpromotion.org.au  
ABN: 443 730 807 90 | ACN: 116 231 595

AHPA commends the Victorian Government for undertaking this Rapid Review and strongly encourages the Review Panel to consider the evidence and perspectives put forward by the Australian Gun Safety Alliance, particularly in the face of significant lobbying pressures. AGSA's long-standing, evidence-based advocacy aligns with AHPA's commitment to promoting environments where people can live, work, and participate free from preventable harm.

We wish you well in progressing this important work and stand ready to support future discussions about how the health promotion workforce can contribute to a strong, nationally consistent firearm safety framework.

Yours sincerely,

Signature



Glen Ramos  
President  
Australian Health Promotion Association

Signature



David Towl  
President, Victoria & Tasmania Branch  
Australian Health Promotion Association

Australian Gun Safety Alliance Members

