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Legislation Development & Review Services
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Dear Committee Members,

The Sporting Shooters' Association of Australia (SSAA) thanks the Legislation Development & Review Services for the opportunity to put forward a submission to the Draft Firearms Amendment Regulations 2017 and Regulatory Impact Statement (RIS).

Unfortunately, it appears that the RIS has failed to note the vital fact that just three per cent of stolen firearms from licensed owners are subsequently used to commit crime¹. Further suggestions that it is "unacceptable" for an average of 200 registered firearms to be stolen from licensed owners per year in Tasmania completely ignores the fact that with approximately 300,000 registered firearms in Tasmania², this equates to just 0.18 per cent of incidents of theft. It also appears to blame the victims.

In its report, the RIS fails to distinguish between homicides committed with registered firearms and those committed with unregistered firearms in the 'Culpable Homicide' graph on page 7. As the *Recorded Crime - Victims, Australia, 2015* report released in July shows, knives and beatings remain the common methods used in homicide - nearly double the number of times firearms are used³. This alone indicates that further restrictions on legal firearms ownership will not somehow stop crime. Furthermore, more than 93% of firearms used in homicides in 2006-07 were found to be unlicensed and unregistered⁴.

A 2014-15 Federal Senate Inquiry into gun-related violence in the community confirmed that Australian gun owners are overwhelmingly storing their firearms responsibly and that these firearms are not being used by criminals in illegal activities. The evidence presented throughout the inquiry showed that the illicit firearms market is where the efforts of our law enforcement agencies should be focused; rather than on the licensed, law-abiding firearms owner. Despite this, the SSAA continues to educate new and current firearm owners about the importance and requirements of storage through our *Secure Your Gun, Secure Your Sport* campaign⁵.

¹ Dearden, J & Jones, W 2008, 'Homicide in Australia: 2006-07 National Homicide Monitoring Program annual report', Australian Institute of Criminology.

² Billings, P 2013, 'Tasmania's registered firearm numbers grow', *The Examiner*, 10 August

³ ABS 2016, 'Recorded Crime – Victims, Australia, 2015', Cat. No. 4510.0, *Victims of Crime, Australia*, Canberra, accessed 5/12/2016,

<http://www.abs.gov.au/ausstats/abs@.nsf/Lookup/by%20Subject/4510.0~2015~Main%20Features~Key%20Findings~1>

⁴ Dearden, J & Jones, W 2008, 'Homicide in Australia: 2006-07 National Homicide Monitoring Program annual report', Australian Institute of Criminology.

⁵ *Secure Your Gun, Secure Your Sport* 2016, Sporting Shooters' Association of Australia, Adelaide, SA, accessed 5/12/2016, <https://ssaa.org.au/publications/secure-your-gun-secure-your-sport/>

Some proposals in the draft regulations appear to be in the absence of credible evidence. For example, the proposal for licensed firearm owners to bear the cost of installing an alarm system or visual recording device for owning any number of handguns, and ten or more firearms of any category, in case of the rare event of theft, will not stop crime. Respected criminologist and former detective, Professor Michael Kennedy has found that “there is no basis for... this industry to be regulated so stringently that it becomes counter-productive⁶.”

Furthermore, alarms will not bring any prompt policing response, especially in regional and inner regional areas where theft has been found to be more likely to occur. The Law Reform Commission of WA in its current review of the *WA Firearms Act 1973* acknowledged “that the elevated risk of storing firearms in a remote location is most probably not ameliorated by having audible security or a 24-hour remotely monitored burglar alarm⁷.”

The SSAA has, and always will, support evidence-based decision-making and supports measures that combat criminals and their use of illegal firearms. Forcing law-abiding firearm owners to adhere to more onerous storage restrictions, which will require more police resources and checks, will not bring any further public safety benefit that the current strict storage requirements bring.

As a major stakeholder in legitimate shooting activities, the SSAA will continue to work towards ensuring the protection of our 180,000-plus members’ freedoms and their interests.

Sincerely,



Geoff Jones

SSAA National President



Tim Bannister

SSAA National CEO

⁶ ‘Concerns gun theft has doubled in six years’ 2016, podcast, *The World Today*, ABC, 30 November, accessed 5/12/2016, <http://www.abc.net.au/worldtoday/content/2016/s4584350.htm>

⁷ Law Reform Commission of WA 2016, *Review of the Firearms Act – Final Report*, accessed 5/12/2016, http://www.lrc.justice.wa.gov.au/files/P105_FR.pdf