



SSAA National Submission

**Attorney-General's Department
National Firearms Register
Public Consultation Paper**

April 2023

The Sporting Shooters' Association of Australia (SSAA National) is responding to the National Firearms Register Public Consultation Paper from the Attorney-General's Department with the interests of the 212,000-plus members of our state and territory associations front of mind. These members are firearms users on an individual level, but many work within the wider firearms industry as retailers, dealers and wholesalers and suppliers.

SSAA National accepts that there should be sensible regulation of civilian firearm ownership guided by evidence-based research. We must stress that after years of evidence, particularly since the introduction of the National Firearms Agreement (NFA) in 1996 and National Handgun Control Agreement in 2002, it is clear that public safety is almost always threatened by the unlicensed person with the unregistered firearm in the rare case where firearms are involved. Indeed, in the most recent Australian Institute of Criminology investigation of firearms used in homicides in 2006-07, more than 93 per cent of firearms were unlicensed and unregistered. The studies by AIC also outline that the introduction of the NFA has had no large effects on reducing firearm homicide or suicide rates.

As the Federal Government continues to press forward with creation of a National Firearms Register, it will be imperative that trusted non-government entities such as SSAA National and the Shooting Industry Foundation of Australia (SIFA) and other relevant groups are involved at a policy and deliberation level. This will allow the Government to consult on workable solutions, communicate with the wider firearms community and prevent the occurrence of unintended consequences from policy decisions.

Key capabilities for law enforcement and regulatory agencies

Question 1: What capabilities should a National Firearms Register provide to government regulators and law enforcement?

A National Firearms Register (Register) needs to improve on the state and territory-based systems in place before it can provide any real benefit to public safety. Two major criticisms of the current systems relate to the accuracy and consistency of information uploaded and the delay in information being uploaded affecting the currency of information. These two factors are arguably the biggest risks to public safety when it comes to law enforcement having access to relevant and current information via the Register.

To ensure the maximum benefit is achieved by having a national Register, information upload will need to operate in near real time, all users will need to be trained to correctly make entries in accordance with National Firearms Identification Database (NFID) templates and law enforcement must commit to using the Register as a part of their processes.

We would expect the same care and professionalism and governance and protection that a state and territory registry is expected to have to be imposed on a national Register.

Question 2: Should a National Firearms Register trace more than firearms, for example firearms accessories, magazines, parts and ammunition?

Firearm parts and accessories such as barrels, stocks, mounts, optics and magazines are innate interchangeable items. Controlling broken-down firearm parts and accessories would inadvertently capture items such as screws, springs or mounts. Currently there are countless firearms entries in all state and territory registries that do not meet a consistent standard. The NFID reference tool, which

is intended to identify and characterise a firearm accurately, is not mandatory. Adding an immeasurable number of items to the Register will clog up an already flawed and overloaded system without achieving any beneficial public safety outcomes.

If the goal of the Register is to ensure legal firearms are identified correctly and linked to their licensed owners to allow jurisdictions to better support public safety outcomes and respond to firearms-related matters and incidents, a barrel, mount, scope or magazine will not be at the centre of the situation.

SSAA National is aware that there is international commentary on ammunition marking and registration. The likely flow on affect in Australia's firearms industry from introducing this arduous process to ammunition manufacturing is impossible to measure and lacking in clear quantifiable benefits for law enforcement. There would need to be significant investment in the supply chain to support manufacturers, retailers and law enforcement in any addition to their processes in this way.

Investing resources into the marking of ammunition processes research is short-sighted when considering the practicality of what is being investigated.

[Question 3: Do you have any comments on the benefits a National Firearms Register will offer to law enforcement and community safety, including any broader benefits that should be explored?](#)

A Register has the potential to reduce red tape for law-abiding licensed firearm owners. Firearm owners are some of the most regulated members of the community who comply with numerous levels of licensing and checks to own and maintain the ownership of firearms to participate in target shooting and recreational hunting.

Introducing additional checks and balances to the state and territory licensing systems would only result in exposing this segment of society would take the focus away from addressing the criminal element at the root cause of this consultation taking place.

Options to reduce wait times for licensing and firearm transfer when relocating interstate would be beneficial. This is a time-consuming process involving firearms dealers, permits to acquire already legally held firearms and license applications that often takes months, if not longer.

Other capabilities

[Question 4: What other capabilities could a National Firearms Register have that would be of benefit to the community, including to lawful firearm owners?](#)

A funding commitment from the Federal Government to allow state and territory registry workforces to rectify inaccurate or incomplete records without placing the impost on law-abiding firearm owners would benefit law enforcers and firearm owners.

Any expected benefits from bringing in a Register with new entries meeting a consistent set of standards via NFID templates will take at least a generation to filter through. Consolidating existing entries is presumably outside the scope of the current workforce and enforcing auditing on licensees is time consuming and unreasonable.

[Question 5: Do you have any comments on the creation of a verification service to support licensing and permit systems?](#)

There could be a benefit to public safety by creating a digitalisation of licensing and permits to allow electronic verification at the time of purchase. This would require a significant upgrade in technology

at the point of purchase, licensing systems at the state and territory level and replacement of licenses held by firearm owners. SSAA National has concerns that the onus of policing would be put on dealers and retailers and any failures in the system could be catastrophic for a group of people not adequately equipped to remedy. This should be the responsibility of law enforcement only.

With this in mind, the ability for industry to have a process to swipe and go with simple confirmation of authority to take possession of a firearm or related ammunition could increase the accuracy of a Register and remove paperwork delays.

[Question 6: Do you think trusted entities should be able to electronically communicate with firearms registries, if so, what capabilities should be available to trusted entities such as firearms dealers?](#)

The existing state and territory registries contain inconsistent and inaccurate records largely due to errors that are inevitable during data entry. We are mindful that the more people altering Register entries, the more potential for errors and in turn, an increased potential for misuse and ultimately privacy breaches of licensed firearm owners.

A receipt system tracking individual user log ins would be imperative to maintain transparency, data quality and licensee privacy. Investment in training, accreditation of users and commitment to privacy and data entry consistency will be needed at all levels.

The impost on industry both financially, potential equipment upgrade and upskilling needs to be managed by the Federal Government to support a legitimate sector of our society worth more than \$2.4billion annually to the economy.

Information held by a National Firearms Register

[Question 7: Do you have any comments on the information proposed to be held by a National Firearms Register?](#)

SSAA National has serious concerns about the scope of the information that could fall within the Register and the links that could be made with other systems. Reference to “relevant information that may affect a person’s eligibility to hold a licence” is a broad statement that brings the privacy of licensed firearm holders into question. In light of moves by the Western Australian Government to require mandatory mental health checks to hold a firearms license, we require further information on the scope of this proposal.

Finally, a National Firearms Register will come at a significant financial impost affecting various departments within the federal, state and territory governments. This will involve considerable organisational change. Expertise should be enlisted from the outset and a systems-based approach needs to be employed.