

Submission
No 228

**INQUIRY INTO PROVISIONS OF THE FIREARMS AND
WEAPONS LEGISLATION AMENDMENT (CRIMINAL
USE) BILL 2020**

Organisation: Sporting Shooters Association of Australia (NSW) Inc.
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Firearms and Weapons Legislation Amendment (Criminal Use) Bill 2020

SSAA NSW INQUIRY SUBMISSION



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1.0 Opening

The Sporting Shooters Association of Australia (NSW) (SSAA NSW) is the peak body dedicated to promoting, protecting, and preserving sports shooting in New South Wales. With over 57,000 members and 136 branches and affiliated clubs across the State, the Association represents the safe, fun, and all-inclusive range of sports shooting available today. SSAA NSW is an essential contributor to:

- government policies;
- industry research and development;
- national firearms competition governance and development;
- tailored educational programs and training; and
- legal and ethical hunting and conservation.

SSAA NSW provides a state-wide, cross-discipline membership coverage that enables members to participate in the sport across the state and various disciplines without the need to join multiple clubs. SSAA NSW manages over 18 shooting disciplines and represents clubs that actively participate in regular local, State and National competitions.

The Association also facilitates and promotes responsible wildlife management, with more than eighty percent of SSAA NSW members involved in recreational hunting and pest management activities. SSAA NSW and its members play an important role in pest animal management and participate in various ethical hunting programs that integrate pest management approaches in conjunction with:

- National Parks and Wildlife Service;
- Department of Primary Industries;
- Local Land Services;
- Local Councils;
- Farming Landowners; and
- Forestry Corporation of NSW.

SSAA NSW is in the final stage of establishing a Registered Training Organisation (RTO) that focuses solely on providing VET approved training courses relating to the use of firearms in different industries including:

- Security;
- Rural Pest Management Training;
- Vertebrate Pest Management Planning Training; and

- Use of firearms to humanely destroy animals.

All the training and programs provided by SSAA NSW meet the needs of the sport and industry and are constantly reviewed for legal compliance to ensure that our members and the industry are meeting all legal and ethical requirements.

SSAA NSW welcomes the opportunity to contribute to the NSW Legislative Council inquiry that was established on 24 March 2020 to inquire into and report on the provisions of the Firearms and Weapons Legislation Amendment (Criminal Use) Bill 2020 (“the Bill”)¹. SSAA NSW hopes, as a result of the inquiry, the NSW Government will have a better understanding of the unintentional impact the Bill would have on law-abiding firearms owners in NSW.

SSAA NSW supports the intended purpose of the Bill, “to be responsive to illegal firearms and those who make the buying, selling and making of illegal firearms a main focus of their criminal business”², as stated by the Minister for Police and Emergency Services, the Hon. David Elliott MP, in the Bill’s second reading. SSAA NSW applauds the Minister for affirming that the Bill is not intended to “criminalise legitimate firearms owners”³.

Through consultation with our members and closer review of the Bill, however, it has become clear that there are significant, unintended consequences for our members and other law-abiding firearms owners. These consequences could effectively criminalise their current law-abiding activities.

SSAA NSW has a long history of supporting tougher laws on criminal activities with firearms and aims to work with the NSW Government and the Legislative Council inquiry, in good faith, to ensure that the final draft to the Bill achieves the intended objective, without unintentionally criminalising law-abiding firearms owners.

¹ Firearms and Weapons Legislation Amendment (Criminal Use) Bill 2020 (26 February 2020). Parliament of New South Wales.

² Elliott, D. (26 February 2020). Legislative Assembly Hansard - 26 February 2020 [p. 1868], Parliament of New South Wales.

³ Elliott, D. (26 February 2020). Legislative Assembly Hansard - 26 February 2020 [p. 1868], Parliament of New South Wales.

2.0 Background

2.1 Object of the Bill

The object of this Bill is to amend the *Firearms Act 1996* (the principal Act) as follows—

- to create a new offence of knowingly taking part in the unauthorised manufacture of firearms or firearm parts and to provide that the offence will include being in possession of certain matter (referred to as a firearm precursor) for the purposes of manufacturing a firearm or firearm part,
- to confer seizure powers on police officers in relation to the new offence,
- to require firearms prohibition orders to be reviewed every 10 years by the Commissioner of Police,
- to provide that the power of a police officer to search a person who is subject to a firearms prohibition order for firearms or firearm parts may also be exercised in relation to any other person who is present on the subject person's premises,
- to make it clear that the powers of a police officer in connection with firearms prohibition orders (including search powers in relation to persons other than the subject person) may only be exercised if reasonably required to determine whether the subject person has committed an offence arising out of the making of the order,
- to make other miscellaneous amendments in connection with the operation and
- enforcement of firearms prohibition orders, including enabling firearms prohibition orders under the law of another jurisdiction to be enforced in this State.

The Bill also amends the *Weapons Prohibition Act 1998* to create a similar offence of taking part in the unauthorised manufacture of prohibited weapons or parts of prohibited weapons.

In his second speech reading, the Minister for Police and Emergency Services, the Hon. David Elliott MP stated the primary purpose that these objectives of the Bill were to deal with two distinct matters, the new offence for "taking part in the manufacture of firearms"⁴ and "enhancing the firearms prohibition order [FPO]"⁵.

In response to the NSW Legislative Council inquiry that was established on 24 March 2020 to inquire into and report on the provisions of the in the Firearms and Weapons Legislation Amendment (Criminal Use) Bill 2020, SSAA NSW has written to all its members asking for

⁴ Elliott, D. (26 February 2020). Legislative Assembly Hansard - 26 February 2020 [p. 1863], Parliament of New South Wales.

⁵ Elliott, D. (26 February 2020). Legislative Assembly Hansard - 26 February 2020 [p. 1866], Parliament of New South Wales.

their feedback and input. SSAA NSW has received an overwhelming number of responses from our members expressing concerns with the Bill. Upon reviewing members' concerns and utilising professional and legal advice, SSAA NSW would like to raise its concerns.

SSAA NSW takes this opportunity to address the intended consequences of the Bill as described by the Minister and would like to bring to the Committee's attention, some of the civil liberties concerns raised by members, as well as the unintended impacts of the Bill on law-abiding firearms owners.

SSAA NSW believes it is important to make our members' concerns in this regard known to the Committee. SSAA NSW would like to encourage the Committee to use their expertise and resources to investigate the impact on law-abiding firearms owners and the further erosion of civil liberties this Bill proposes, including the unnecessary expansion of police powers.

2.2 Manufacture of Firearms or Firearm Part

Schedule 1[3] of the Bill inserts section 51J into the *Firearms Act 1996* to create a new offence of taking part in the illegal / unauthorised manufacture of a firearm or firearm part. The new offence, as explained by the Minister, intended to overcome the limitations with the existing offence of unauthorised manufacture of firearms (section 50A). The Minister gave the following example in his second reading:

If police find an outlaw motorcycle gang clubhouse filled with machining equipment and materials, they may not be able to take action unless they could prove that a functioning firearm was the end result.⁶

While SSAA NSW understands that the new offence would enable police to respond to illegal manufacture more effectively, especially in the example of the outlaw motorcycle gang given by the Minister. SSAA NSW has significant concerns about the implication of such offences, as currently drafted, and its impact on law-abiding firearms owners, especially in rural and remote communities.

The machining equipment and materials presumably used to create a functional firearm are not unique, most are readily available for many other legitimate uses. Sheds, engineering workshops and garages across the state are filled with machining equipment and materials that could be misinterpreted as being used to create a firearm or firearm part. Tool shops,

⁶ Elliott, D. (26 February 2020). Legislative Assembly Hansard - 26 February 2020 [p. 1863], Parliament of New South Wales.

different types of businesses, volunteer organisations (like Men's Sheds) and trade training organisations all have a legitimate need to have and use what the Bill is considering a firearm precursor.

Farmers and people in rural communities generally have a greater day to day need to use firearms. This combined with limited access to gunsmith services would almost certainly necessitate repairs being carried out by the owner of the firearm to ensure its availability.

The Bill, as currently devised, does not clearly define the difference between the ownership and/or the usage of the machining equipment and materials of legal and legitimate usage and to create illegal firearms. The Minister states that under the new offence, in his example of the outlaw motorcycle gang clubhouse "it would appear fairly obvious to police that the production of firearms or prohibited weapons was the intention"⁷. There is no clear indication in the Bill as it stands, however, as to how this is the case and how the police will reach such a conclusion, or how they would deal with the existence of the same machining equipment and materials with a law-abiding citizen who has a legitimate use for them.

Under this proposed offence, the police do not have to provide evidence that a functioning firearm would result from the manufacturing process. Instead it seems that the person accused would have to prove that it was not. In that capacity, the Bill removes some fundamental principles of the criminal justice system, by encroachment on the right of presumption of innocence.

This right is a common law principle that is entrenched in the English legal system and contained in article 14(2) of the International Covenant on Civil and Political Rights (ICCPR) to which Australia is a signatory. In *Momcilovic v The Queen*, His Honour French, Chief Justice of the High Court of Australia stated:

The common law "presumption of innocence" in criminal proceedings is an important incident of the liberty of the subject. The principle of legality will afford it such protection, in the interpretation of statutes which may affect it, as the language of the statute will allow. A statute, which on one construction would encroach upon the presumption of innocence, is to be construed, if an alternative construction be available, so as to avoid or mitigate that encroachment. On that basis, a statute which could be construed as

⁷ Elliott, D. (26 February 2020). Legislative Assembly Hansard - 26 February 2020 [p. 1864], Parliament of New South Wales.

imposing either a legal burden or an evidential burden upon an accused person in criminal proceedings will ordinarily be construed as imposing the evidential burden.

The rights and freedoms of the common law should not be thought to be unduly fragile. They have properly been described as "constitutional rights, even if ... not formally entrenched against legislative repeal." [76] Nevertheless, statutory language may leave open only an interpretation or interpretations which infringe one or more rights or freedoms. The principle of legality, expressed as it is in terms of presumed legislative intention, is of no avail against such language.⁸

While most firearms parts are currently regulated under the *Firearms Act 1996*, this Bill empowers the police to assume that anyone that has a shed, an engineering workshop or garage with equipment and materials could be manufacturing a firearm part or a precursor without the need to prove that it is actually the case. This is an unacceptable price for NSW citizens to pay to convict the outlaw motorcycle gang as given in the Minister's example. The Bill should distinguish between outlaw gangs and law-biding firearms owners.

2.2.1 "Firearm precursor"

The term "*takes part*" includes the possession of a firearm precursor for the purposes of manufacturing a firearm or firearm part. A *firearm precursor* is defined as any object, device, substance, material or document used, or capable of being used, in the process of manufacturing a firearm or firearm part (including computer software or plans).

Definition of "firearm precursor"

- A firearm precursor means any object, device, substance, material or document used or capable of being used in the process of manufacturing a firearm or firearm part, including (but not limited to) the following—
- moulds for making firearm parts,
- milling, casting or rifling equipment,
- digital blueprints within the meaning of section 51F,
- computer software or plans

⁸ Momcilovic v The Queen [2011] HCA 34 at [44]-[45].

The machining equipment and materials presumably used to create a functional firearm as detailed above are mostly not unique; they are readily available and have many other legitimate uses.

The definition of what constitutes “knowingly take part” could be misinterpreted and could vary drastically between officers. The apparent ambiguity in the Bill could again lead to the incorrect use of powers.

The Bill also does not separate licensed, law-abiding firearms users who hold a legally owned firearm under the Act, from unlicensed people who illegally own firearms. Most firearms parts are currently regulated under the *Firearms Act 1996*. There is no apparent reason to extend the regulation of readily available equipment and material under the label of firearm precursors.

2.2.2 Examples of “taking part”

SSAA NSW has serious concerns that law-abiding firearms owners may be targeted based on non-legitimate reasons. The following examples indicate how law-abiding firearms owners could be considered as “taking part” in illegal activities, under the Bill:

Fitting of Sights

Currently, the NSW regulations prohibit illegal modification to firearms. The fitting of sights, however, appears to have been an acceptable and logical practice under these current regulations.

Under the Bill, where modifications and precursors are specifically targeted as criminal activity, the fitting of a telescopic sight to a rifle becomes a criminal act. Sighting-in is a required safety practice that needs to be regularly checked by the licensed firearms owner. The fitting and adjustment of sights, therefore, must be legislated to be an essential safety act for all responsible, law-abiding firearms owners.

The best way of achieving this is to ensure that the law-abiding firearms owner is written into and protected by the legislation, to avoid criminalisation by unintended consequence.

Cleaning

Currently the NSW regulations prohibit modification to firearms. The cleaning of firearms, however, has been an acceptable and logical practice under the current regulations. Cleaning

a firearm requires certain tools and a degree of disassembly and reassembly. Under the proposed criminal use amendments, cleaning becomes a criminal activity, as modifications, precursors and the tools required to disassemble and reassemble a firearm for cleaning are banned.

The cleaning and maintenance of a firearm must be recognised as an essential safety act for all responsible, law-abiding firearms owners. The best way of achieving this is to ensure that the law-abiding firearms owner is written into and protected by the legislation, to avoid criminalisation by unintended consequence.

Competition Shooting

Competition shooting, especially Benchrest and Long-Range Precision Shooting, require the utmost accuracy from the competitor's rifle. To achieve this, the law-abiding firearms owner/competitor will often own multiple barrels and cartridge chamber reamers, ensuring consistency from barrel to barrel that matches their hand-prepared ammunition.

The barrels are chambered by a gunsmith and are registered. If the competitor wants their own chamber reamer, however, rather than using the gunsmith's (used) reamer, the competitor is considered to own a "precursor" under the proposed amendments. This automatically criminalises the law-abiding firearms owner/competitor under the proposed criminal use Bill.

Further, this would criminalise our sports shooters competing at local, state and national competitions, as well as those who represent Australia at international sporting events.

2.3 "Power to seize firearms, firearms parts and firearm precursors"

The Bill utilises the seizure powers of Part 17 of the *Law Enforcement (Powers and Responsibilities) Act 2002*. Division 1, Confiscated Knives and other dangerous articles and implements⁹, provides police with additional discretionary powers to not release seized items under certain circumstances.

⁹ Law Enforcement (Powers and Responsibilities) Act 2002 No 103 (29 November 2002), Part 17 Property in police custody, Division 1 Confiscated knives and other dangerous articles and implements [p. 134]

SSAA NSW holds concern that these additional discretionary powers, when coupled with the proposed Bill, could create an infinite loop scenario with regards to an individual or group attempting to recover seized property. Any item seized could be held by police using the discretionary powers, despite it being determined that there is no case to be answered.

This would leave the individual or group with no alternative but to initiate proceedings in the local court to attempt to achieve the return of their property.

2.4 “Provide assistance or information”

This power constitutes another major breach of the common law principle that is entrenched in English law and contained in the International Covenant on Civil and Political Rights (ICCPR), to which Australia is a signatory: the right to silence and not be compelled to self-incriminate.¹⁰

The following section of the Bill removes this right from law abiding citizens:

- (2) In exercising a power under subsection (1), a police officer may direct any person whom the police officer believes on reasonable grounds to be in charge of or otherwise responsible for the thing that has been seized to provide assistance or information (including a password or code) that may reasonably be required by the police officer to enable the officer to access any information held or contained in the thing that has been seized.
- (3) A person must not—
 - (a) without reasonable excuse, fail to comply with a direction under subsection (2), or
 - (b) in purported compliance with a direction under subsection (2), provide any information knowing that it is false or misleading in a material respect.

Maximum penalty—50 penalty units or imprisonment for 2 years, or both.

The right to silence, and not be compelled to self-incriminate is entrenched in common law and s89 of the *Evidence Act 1995*, which states:

¹⁰ International Covenant on Civil and Political Rights [1979], article 14(2).

- (1) In a criminal proceeding, an inference unfavourable to a party must not be drawn from evidence that the party or another person failed or refused:
 - (a) to answer one or more questions; or
 - (b) to respond to a representation;
 - (c) put or made to the party or other person by an investigating official who at that time was performing functions in connection with the investigation of the commission, or possible commission, of an offence¹¹.

This fundamental right is for all citizens and should never be removed, nor should those rights be suspended for firearms offences. No citizen should be coerced or threatened by a penalty to relinquish their right to silence nor be compelled to self-incriminate.

While SSAA NSW appreciates the Minister's concerns and intent, this section and several other submissions, have highlighted the potential consequences of this Bill. Other submissions include the Government's own Legislation Review Committee which "refers the power to Parliament to consider whether its impact on the privilege against self-incrimination is reasonable" ¹².

The Committee must weigh the intention of the Bill against the erosion to civil liberties it proposes. SSAA NSW would encourage the Committee to use their expertise and resources to further investigate the erosion of civil liberties that this Bill proposes, as well as the unnecessary expansion of police powers it embeds in the NSW justice system.

3.0 Firearms Prohibition Order

The Bill also expands the search powers relating to a Firearms Prohibition Order (FPO) under Part 7 of the *Firearms Act 1996*¹³. The Minister explains that the current search powers introduced in 2013:

...have increased the positive results in removing illegal firearms from the community and in cracking down on serious crime... the Ombudsman's report on the review has been tabled in New South Wales Parliament... with

¹¹ Evidence Act [1995], Section 89, Evidence of Silence [p. 59].

¹² Legislation Review Committee (24 March 2020), Section 9 [p.28], Parliament of New South Wales.

¹³ Firearms Act [1996], Part 7 Firearms prohibition orders.

some small exceptions, ..."it appears that police have largely targeted the cohort of people Parliament intended when conducting searches under the FPO search powers" ¹⁴.

3.1 Ombudsman's Report

It is worth noting that the Ombudsman's report referenced by the Minister also found that "in 14% of search events, police conducted a search on the basis of their apparent understanding that a search can be conducted for the reason alone that the person is an FPO subject"¹⁵.

The Ombudsman pointed out that this is not considered correct, a "search can be conducted only when 'reasonably required' to determine if an FPO offence has been committed" and recommended "Parliament to consider amending the legislation to resolve the apparent ambiguity that has led to the incorrect use of the search powers"¹⁶. The current amendment does not deal with the ambiguity but, rather, unnecessarily extends the police power to search.

The Ombudsman recommends that the FPOs expire after five (5) years, not ten (10), as this "will allow police to continue to target current firearms risks while reducing the potential for people to be subject to arbitrary or unreasonable searches". Professor John McMillan AO also stated:

The fair and reasonable use of these new FPO search powers depends largely on the discretion of individual police officers. Adopting our recommendations will assist police to manage the risk of unreasonable use by placing clear limitations around the duration and scope of FPOs. This will encourage and facilitate the appropriate use of the powers and, in turn, maintain public confidence in police¹⁷.

It is unclear as to how the proposed changes address these cautionary remarks, or how the new powers will be able to assist police officers in their decision-making process.

¹⁴ Elliott, D. (26 February 2020). Legislative Assembly Hansard - 26 February 2020 [p. 1866], Parliament of New South Wales.

¹⁵ Review of police use of the firearms prohibition order search powers (August 2016), Section 74A of the Firearms Act 1996, [p. iv].

¹⁶ Review of police use of the firearms prohibition order search powers (August 2016), Section 74A of the Firearms Act 1996, [p. v].

¹⁷ Review of police use of the firearms prohibition order search powers (August 2016), Section 74A of the Firearms Act 1996, [p. v].

While the detailed finding in the Ombudsman's report is beyond the scope of this submission, the report provided some very concerning statistics about the FPO search during the research period:

- 17% of people searched came from a non-English-speaking background;
- 93%, were men;
- 12% were of Aboriginal or Torres Strait Islander descent;
- 18% had mental health issues; and
- 4% had cognitive or physical impairment.

This shows that 50% of people searched were considered vulnerable people under the *Law Enforcement (Powers and Responsibilities) Act 2002*, and more than 50% of all searches conducted were within South-Western Sydney¹⁸.

SSAA NSW notes that this report was published in 2016 and only analysed data relating to 22 months of search and would like to take this opportunity to recommend that the Committee undertake additional research before further eroding civil liberties. SSAA NSW welcomes an up-to-date review from the NSW Ombudsman and other agencies concerned with such liberties, before the enactment of the Bill.

3.2 Firearms prohibition orders “10 years”

While SSAA NSW welcomes the time limited FPOs, the Bill proposes an FPO expiry after ten (10) years. SSAA NSW instead supports the five (5) year expiry recommendation of the Ombudsman report as this "will allow police to continue to target current firearms risks while reducing the potential for people to be subject to arbitrary or unreasonable searches"¹⁹.

SSAA NSW further supports the recommendation of Professor John McMillan AO in dealing with the ambiguity of the search orders and largely depends on individual police officer's discretion.

SSAA NSW hopes to see a clear protection of our community's most vulnerable people, as defined under *Law Enforcement (Powers and Responsibilities) Act 2002* inserted into the FPOs procedures.

¹⁸ Review of police use of the firearms prohibition order search powers (August 2016), Section 74A of the Firearms Act 1996 [p. 6].

¹⁹ Review of police use of the firearms prohibition order search powers (August 2016), Section 74A of the Firearms Act 1996, Chapter 5. Vulnerable People [p. V].

3.2.1 “Opportunity to surrender all firearms”

There are no set criteria for the making of an FPO, beyond the necessity for public safety. As such, FPOs are taken against people for many reasons, some of which are not related to criminal activities or violence. These include mental health issues.

As such, further consideration should be given to the provisions of FPOs in the event where a person is forced to dispose of their firearms. A person subject to an FPO should be provided the opportunity to dispose of their firearms legally and within an acceptable period.

Currently, no firearms are allowed on the premises of a person subject to an FPO. This becomes an issue for a property that houses multiple firearms owners. SSAA NSW suggests that:

- a person under an FPO should be given the option to sell, donate or surrender their firearms; and
- other law-abiding firearms owners who reside on the premises should be provided the time to arrange alternative storage for their firearms.

3.2.2 “Persons other than the subject person”

Being in the presence of a person subject to an FPO should not automatically be considered reasonable grounds for an undue personal search. The Ombudsman’s report noted:

“it appears that a significant number of the person searches of people not subject to an FPO may have been conducted based on a mistaken belief that the FPO search powers authorised these kinds of searches”²⁰.

SSAA NSW understands the intent of the Minister and notes that the Ombudsman’s report recommended:

“we have also formed the view that consideration should be given to providing police with a separate and additional power to search a person on private premises (who is not the subject of an FPO) should police reasonably suspect the person to be in possession of a firearm, firearm part or ammunition”²¹.

²⁰Review of police use of the firearms prohibition order search powers (August 2016), Section 74A of the Firearms Act 1996, Implementation issues (chapter 7), [p. 8].

²¹Review of police use of the firearms prohibition order search powers (August 2016), Section 74A of the Firearms Act 1996, Implementation issues (chapter 7), [p. 8].

As previously indicated, consideration should be given to the reasons for an FPO. SSAA NSW is in favour of the recommendation for “further education for police to ensure the lawful use of the FPO search powers”²².

Notwithstanding the reservation expressed in this document in relation to FPOs, SSAA NSW is supportive of the enforcement of Firearms Prohibition Orders made under a provision of the law of another jurisdiction. SSAA NSW also supports the Commissioner’s function to review Firearms Prohibition Orders so that they may only be delegated to a police officer of or above the rank of Inspector.

²²Review of police use of the firearms prohibition order search powers (August 2016), Section 74A of the Firearms Act 1996, Implementation issues (chapter 7), [p. 8].

4.0 Conclusion

SSAA NSW welcomes the opportunity to contribute to the NSW Legislative Council inquiry that was established on 24 March 2020 to inquire into and report on the provisions of the Firearms and Weapons Legislation Amendment (Criminal Use) Bill 2020 (“the Bill”). SSAA NSW hopes, as a result of the inquiry, the NSW Government will have a better understanding of the unintentional impact the Bill would have on law-abiding firearms owners in NSW.

SSAA NSW supports the intended purpose of the Bill, “to be responsive to illegal firearms and those who make the buying, selling and making of illegal firearms a main focus of their criminal business”, as stated by the Minister for Police and Emergency Services, the Hon. David Elliott MP, in the Bill’s second reading. SSAA NSW applauds the Minister for affirming that the Bill is not intended to “criminalise legitimate firearms owners”²³.

As demonstrated throughout this document, it is clear that the Bill requires significant revision to avoid the overextension of police powers and the erosion of the civil liberties entrenched in the NSW legal system and granted under the International Covenant on Civil and Political Rights (to which Australia is a signatory).

In addition, the unintended consequences for our members and other law-abiding firearms owners (including sports shooters who represent Australia on the international stage), are truly significant. SSAA NSW urges the Committee to use their expertise and resources to investigate these issues further.

SSAA NSW volunteers to work alongside the NSW Government and the Legislative Council inquiry, in good faith and in any capacity, to ensure that the final draft to the Bill achieves the intended objective, without unintentionally criminalising law-abiding firearms owners.

SSAA NSW would also like to take this opportunity to again suggest a State Ministerial Advisory Committee be established to support the sport and the industry. The Ministerial Advisory Committee should be composed of genuine peak associations working together, in synergy, to assist the Minister and the Regulator with the key issues that are currently facing the sport and industry.

²³ Elliott, D. (26 February 2020). Legislative Assembly Hansard - 26 February 2020 [p. 1868], Parliament of New South Wales.

5.0 Closing

On behalf of the members, volunteers, staff and board of SSAA NSW, we appreciate the opportunity to contribute to the NSW Legislative Council inquiry of the Firearms and Weapons Legislation Amendment (Criminal Use) Bill 2020. We hope this response has created a clear picture of the significant impacts on law-abiding firearms owners in New South Wales.

SSAA NSW looks forward to continuing to work alongside the NSW Government and the Legislative Council to create change and effectively target the criminal use of firearms.

Thank you,

Lance Miller
President, SSAA NSW

Jai Rowell
CEO / Executive Director, SSAA NSW