



Sporting Shooters Association of Australia (Tasmania) Inc

INCORPORATED IN TASMANIA

PO BOX 516, Glenorchy, Tasmania 7010

Mr T Buttsworth

Secretary

House of Assembly Select Committee on Firearms Legislation and Policy

Re: Supplementary Submission by the Sporting Shooters Association of Australia (Tasmania) Inc.

Dear Sir,

Thank you for your correspondence noting our submission to the now defunct Upper House Inquiry and giving the following advisory; *The Committee also resolved that I write to you to advise that your submission to the Legislative Council Select Committee Firearms Law Reforms has been noted and the Committee will consider your submission as part of this Inquiry. However, as the Terms of Reference for this Inquiry are different to those of the previous inquiry, the Committee would welcome any additional new information you may wish to provide.*

Firstly, I would reiterate that we would be pleased if our original submission could be considered in its entirety and to further note we do wish to make a short additional submission regarding;

- Category H Licence holders and participation returns
- Seemingly ad hoc ammunition carriage conditions on the TT line

These are detailed as follows.

Category H Licence Holders and Participation Returns for Reason 1 Licence Holders.

Background

The relevant excerpt from the *Firearms Act (1996)* for this discussion is;

47. Special conditions of certain licence

(3) A Category H firearms licence for sport or target shooting is subject to the following conditions:

(b) the holder must comply with minimum annual participation rates relating to sport or target shooting as specified in the conditions of the licence and provide evidence to the Commissioner of his or her compliance with those annual participation rates unless exempted from doing so by the Commissioner.

In 2003, the Act was amended to include this condition. Up until recently, holders of category H licences, who did not have a handgun registered to them had not been required to submit a participation card, the form of which is explained to a degree on the Tasmania police website - <https://fas.police.tas.gov.au/wp-content/uploads/2018/08/Participation-Rate-Record-Pistol-Target-Shooting-1.pdf>

A recent circular to clubs from Firearms Services (FAS) advised that **all** Cat H holders must submit a participation card with a minimum of six shoots. We are also led to believe that in the recent renewals process, that Cat H endorsement has been removed from licences of licensees with no handguns who have not submitted a participation card, including those who may have participated using borrowed firearms, but did not complete a card on the understanding it was not required for them.

We are concerned that an administrative change is proposed that unilaterally flies in the face of past practice.

Current Situation.

A recent discussion with FAS indicated the current approach is based on recent legal advice. We are not privy to this advice. It is our view that the section highlighted above is the key, and we were subsequently advised by FAS that a "condition of licence" to make this requirement explicit that has not been communicated to Cat H holders and further action would be held in abeyance.

Suggested Resolution

We would request that the Committee recommend that this situation be resolved and that it be resolved so that Cat H holders without a registered firearm are not subject to participation rates.

There are a number of reasons why this makes sense, rather than building ad hoc administrative conditions around the NFA, which does not have legislative effect and lacks guidance to resolve sensible everyday issues. These reasons are;

- 1) Range and Safety Officers may need to be handle and check firearms. They cannot do this without the relevant licence. It is our goal to ensure our Range Officers have as broader scope of operation as possible.
- 2) People officiate and referee at State, National and International tournaments. They need to be as equipped to handle as many situations as possible.
- 3) Certain classes of shooters require direct supervision. It makes sense to encourage the most experience cohort of the club to undertake these duties and they may be restricted in doing so if they cannot hold the required licence even though they may have decades of experience in that category of firearm.
- 4) Families may wish to participate in club activities, where they can share a firearm. This rule could encourage them to acquire firearms than they otherwise would not acquire.

The participation card is predisposed account for the number of firearms owned and the scope of disciplines competed in. It follows in our mind, that if you don't have firearm registered this logic fails, so why fill in a card?

This discussion also raises the question of what constitutes "participation". It is our view that any of the above administrative duties do involve participation in competitive shooting matches. However, if participation continues to be narrowly focussed on the actual use of a firearm, participation rates should then be based on the actual ownership status of a Category holder. To do otherwise, encourages the ownership of additional firearms and restricts access to the valuable experience of club members.

TT Line and Conditions of Carriage

This may seem a rather cryptic subject for this inquiry, however it was noted in our original submission, because it was mentioned in the Government's policy and listed as a future duty for TFOC. TFOC is very much in the current Terms of Reference.

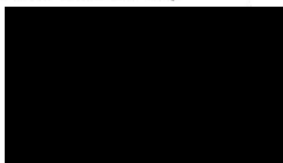
In our original submission we expressed the hope that this issue could be resolved by direct discussion, but a very recent piece of correspondence from the Minister for Infrastructure gave us the distinct impression that they (the TT Line) is unwilling to be involved in direct technical discussions with stakeholders. Given the effort we have put into trying to scope out the issues, and build meaningful engagement, we were quite disappointed by the tone and contents of the letter.

SSAA Tasmania has made great progress in the last nine months in resolving issues with the new leadership model in FAS. It has saved a lot of unnecessary churn through Ministerial offices. It would be hoped that we could achieve the same outcome with other Government entities. However, if we are unable to achieve this in our own right, we see this as another strong reason for the creation of TFOC, which may be at least be able to give some enhanced credibility to seeking outcomes that have material consequences for firearm owners.

We reiterate that a "broad based consultation group" is one that understands firearm issues, is attempting to propose sensible ownership and use conditions and has a rational approach to balancing community risk. It is not characterised by inclusion of persons with an agenda that is clearly anti firearm and firearms ownership.

In closing I request the Inquiry to view all our contributions favourably and we hope that we are given the opportunity to meet and discuss items with the Committee.

Your Sincerely



Donald Riddell

Senior Vice President
SSAA Tasmania Inc

25th October 2018.