

8 August 2022

[REDACTED]
Member for [REDACTED]
VIA Email: [REDACTED]

Dear [REDACTED]

Re: Firearms Amendment Bill 2022

The Shooting Industry Foundation of Australia is the peak body representing the major importers and wholesalers of firearms and related accessories to the defence, law enforcement and civilian sectors. In 2019, our industry was estimated to contribute \$2.4 Billion to Australia's GDP and supported some 19,000 local jobs.

I am writing to you today to ask that you consider giving your support to a Bill that has been introduced to the Victorian Parliament by the Shooters, Fishers and Farmers Party, the Firearms Amendment Bill 2022.

This Bill seeks to improve the Firearms Act 1996, by removing the unnecessary subjective assessment of a firearm's aesthetics for the purposes of categorisation.

In Australia, firearms are grouped into categories which then determines which class of license is required to legally own and use that type of firearm. In the interests of a nationally consistent approach to regulation, these categories have already been defined in the National Firearms Agreement (NFA).

The Australian Criminal Intelligence Commission facilitates a national database called the Australian Firearms Information Network (AFIN). The sole intent of this database is for jurisdictions to reference so that they can appropriately identify and classify a firearm in a nationally consistent manner.

Every jurisdictional reclassification of a firearm based on appearance, moves Australia further away from a nationally consistent approach to firearms regulation as intended by the National Firearms Agreement.

Appearance based controls also cause enormous issues for our highly regulated and compliant Australian shooting industry. Like all regulated industries, we rely on regulatory certainty to trade. When a firearm is imported, it is classified using the ACIC NFID database.

When an individual jurisdiction applies a further subjective test that reclassifies a firearm out of step with the AFIN, this becomes extremely costly for legitimate businesses who may be unable to sell that particular firearm.

SIFA is also concerned that appearance-based provisions and the inconsistent categorisation of firearms is causing licensed and law-abiding sporting shooters and hunters to unintentionally fall foul of the law. We have seen several instances where people have travelled interstate to hunt or attend a shooting competition, possessing their legally owned firearm where unbeknownst to them, that firearm has been prohibited based on 'appearance' in the jurisdiction they have travelled to.

I must stress, by removing appearance-based categorisation provisions from the Victorian Firearms Act, all that is being sought is to assess a firearm by using an objective technical assessment of fundamental engineering principles (e.g., actuation and ammunition type), rather than what it looks like.

SIFA has long advocated for an evidence-based approach to firearms regulation. We are unaware of any evidence or data that suggests firearm appearance laws increase public safety or reduce illicit gun crime. In the absence of any data to the contrary, it is logical to conclude that appearance provisions are redundant.

I have attached to this letter SIFA's formal position statement on Appearance Based Firearms Controls for your information.

I would like to thank you for taking the time to read my correspondence and I welcome the opportunity to discuss this with you at your convenience.

Yours Faithfully,

A handwritten signature in black ink, appearing to read 'James Walsh', with a stylized, cursive script.

James Walsh
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