



The Australian Deer Association's Submission on the Combatting Anti-Semitism, Hate, and Extremism Bill 2026 Draft.

About the Australian Deer Association

The Australian Deer Association represents Australia's recreational deer hunters who are law-abiding firearm owners who use firearms for legitimate purposes, including hunting, wildlife management, conservation activities, and food security. As firearm owners, recreational hunters operate under one of the most stringent firearm regulatory frameworks in the democratic world and have a demonstrated history of compliance with licensing, storage, training, and probity requirements. Through meaningful engagement with governments since our establishment in 1969, we have advocated for unlocking public land for recreational deer hunting in New South Wales, Tasmania, and Victoria, including the recently legislated opening of the Snowy River and Errinundra National Parks. Practical outcomes and policy achievements such as these were only possible through ongoing goodwill from governments.

The Association unequivocally condemns antisemitism, hate crimes, extremism, and all forms of politically motivated violence. We support proportionate, evidence-based measures that enhance public safety and national security. However, this submission raises concerns regarding the firearm-related measures contained within the Combatting Antisemitism, Hate and Extremism Bill 2026.

Limitations of this submission are due to the process and timeframes

At the outset, the Australian Deer Association wishes to place on the public record that the scope of this submission has been necessarily limited by the extremely short timeframe provided for stakeholder input. Less than two business days were afforded to review and respond to an exceptionally large and complex Bill that amends numerous primary and subordinate pieces of legislation across criminal law, intelligence, telecommunications, migration, customs, and firearms regulation.

Given the size, technical complexity, and cross-jurisdictional impacts of the Bill, it has not been possible to undertake the level of due diligence that would ordinarily be expected for legislation of this magnitude. As a result, this submission focuses primarily on two areas of immediate concern for lawful firearm owners, namely the expansion of AusCheck background checks and the drafting of the carriage service offences.

The Association is concerned that the Bill contains additional issues, risks, and unintended consequences affecting lawful firearm owners. However, the insufficient



consultation period has not afforded sufficient time to identify, analyse, or test those provisions in a responsible and comprehensive manner.

Process and consultation concerns

The lack of meaningful consultation with peak firearm organisations, industry representatives, and subject matter experts prior to the introduction of this Bill is deeply concerning. The compressed submission window further compounds this issue and limits stakeholders' ability to provide informed, constructive feedback.

Such an approach increases the risk that provisions will have unintended consequences for compliant citizens and undermines confidence in the legislative process. Effective national security legislation benefits from careful scrutiny and engagement, particularly where it intersects with existing regulatory regimes.

Expansion of AusCheck and application to firearm ownership

The extension of AusCheck background checks to firearm licensing and ownership marks a fundamental shift in how lawful firearm owners can be assessed under Commonwealth law. This introduces a national security vetting mechanism into a licensing framework that has historically been administered by states and territories through criminal history checks, character assessments, and ongoing police oversight.

The Association is concerned that AusCheck is being applied without sufficient clarity regarding its scope, thresholds, or safeguards in civilian licensing contexts. Licensed firearm owners are not employed in security-sensitive roles and have already met rigorous probity requirements.

Of particular concern is the absence of a clear, accessible right of appeal for individuals who may be adversely assessed under the AusCheck process. Decisions that may result in licence refusal, suspension, or cancellation carry serious and often irreversible consequences.

The lack of a transparent, merit-based review process is inconsistent with the principles of procedural fairness, particularly when assessments may rely on undisclosed or intelligence-based information. Without appropriate safeguards, there is a real risk of error, overreach, and unjust outcomes.

Carriage service offences and lack of clarity

The Association also raises serious concerns about the drafting and breadth of the carriage service offences relating to firearms, ammunition, and explosives-related material. As currently framed, these provisions lack sufficient clarity to ensure that



lawful firearm owners are not inadvertently captured by offences intended to target criminal conduct.

Licensed firearm owners routinely and lawfully communicate about firearms-related matters using carriage services. This includes sharing reloading data, ballistic information, equipment advice, and safety practices through email, online forums, and private messaging platforms.

The current draft creates uncertainty about whether sharing lawful reloading information or technical advice between licensed individuals could fall within the scope of prohibited conduct. In a criminal law context, such ambiguity is unacceptable and risks chilling legitimate, safety-focused communication.

Disproportionate impact on lawful firearm owners

The Association is frustrated that lawful firearm owners continue to be captured by broad legislative responses to extremism and serious crime despite no evidence linking this community to such threats. Australia's firearm owners are already heavily regulated and subject to continuous oversight.

Adding further layers of intelligence-based assessment and broadly framed criminal offences without adequate justification or appropriate rights of appeal is unnecessary.

Need for balance and further scrutiny

Given the limitations imposed by the consultation process, the Australian Deer Association strongly encourages the Committee to treat this submission as an initial contribution rather than a comprehensive assessment of the Bill's impacts on lawful firearm owners.

The Association urges the Committee to ensure that:

- Sufficient time is afforded for proper scrutiny and stakeholder engagement
- Firearm-related provisions are clearly defined and narrowly targeted
- Procedural fairness and appeal rights are embedded where adverse decisions may occur
- Further unintended consequences are identified and addressed prior to passage

Conclusion

The Australian Deer Association supports strong and effective firearm laws. However, these must be developed through careful drafting, adequate consultation, and respect for fundamental principles of fairness.



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We respectfully submit that the concerns outlined above warrant serious consideration and that further scrutiny is required to ensure that lawful firearm owners are not unfairly or inadvertently impacted by this Bill.

