



# Submission to the Rapid Review of Victoria's Firearms Laws

Prepared by:  
**Australian Deer Association**

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# ADA MISSION

We advocate for the sound management of wild deer and ensure recreational hunting is sustainable, respected, and valued by the wider community and future generations.

We do this via our commitment to the sustainability of wild deer through habitat management, education, political advocacy, and community engagement.



Australian  
**Deer**  
Association

# Table of Contents

	Page
Mission	02
Executive Summary	04
1. Introduction	06
2. About the Australian Deer Association	07
3. Overarching Principles	08
4. Response to the Terms of Reference	9
• 4.1 The number of firearms that can be held by an individual	9
• 4.2 Firearms categories and emerging technologies	10
• 4.3 Licensing schemes, licence types, and citizenship or residency requirements	11
• 4.4 Licence duration, renewal requirements, and ongoing monitoring	12
• 4.5 Strengthening laws relating to illicit firearms	12
• 4.6 Imitation firearms, accessories, and related items	13
• 4.7 Use of criminal intelligence in licensing decisions	13
• 4.8 Information sharing between agencies	13
5. Conclusion	14



# Executive Summary

The Australian Deer Association (ADA) welcomes the opportunity to contribute to the Rapid Review of Victoria's Firearms Laws and acknowledges the Victorian Government's commitment to enhancing community safety through effective, contemporary firearms regulation.

ADA recognises the serious public safety context in which this Review is being undertaken and supports reforms that are evidence-based, proportionate, and focused on demonstrable risk. ADA also acknowledges the Victorian Government's long-standing recognition of recreational hunting as a legitimate and regulated activity, and the associated lawful possession and use of firearms for that purpose.

ADA notes that there is limited publicly available data on the operational impacts of firearms regulation on lawful recreational hunters, including how firearms are used across different lawful activities, how regulatory changes may affect compliance, and where unintended consequences may arise. To assist the Review in addressing this evidence gap, ADA conducted a structured survey of its members, representing licensed recreational firearm users operating within Victoria's regulatory framework. Findings from this survey are used throughout this submission to provide stakeholder-based evidence on lawful firearm use, compliance behaviour, and the practical implications of proposed reforms.

Key points of this submission include:

- **Firearms limits:** ADA does not support arbitrary numerical caps on firearms. Survey evidence demonstrates that recreational hunters commonly participate in multiple lawful activities and require different firearms for different species, hunting methods, environments, and animal welfare standards, including minimum calibre requirements. There is no evidence that the number of firearms lawfully held by licensed recreational hunters is correlated with violent crime or public safety risk.
- **Firearms categories:** ADA supports periodic review of firearms categories to ensure they remain fit for purpose, while cautioning against unintended capture of traditional hunting firearms. Any changes should be technically precise, enforceable, and informed by consultation.
- **Licensing framework and eligibility:** ADA supports strong licensing standards, including background checks, fit-and-proper-person assessments, and appropriate testing arrangements. ADA notes recent audit and uplift activity led by Victoria Police's Licensing and Regulation Division, in consultation with the Victorian Firearms Consultative Committee, which demonstrates that the existing system has been strengthened through an evidence-based review. Proposals to introduce citizenship-based eligibility requirements should be supported by clear evidence of risk mitigation, noting the impact such changes would have on compliant permanent residents who already meet all licensing requirements.
- **Licence duration and monitoring:** ADA supports robust renewal and monitoring arrangements but cautions against shortening licence duration. Reducing licence terms from five to three years would increase renewal processing volumes by approximately 66 per cent on an ongoing basis, diverting regulatory resources away from intelligence-led monitoring and illicit firearms enforcement, without evidence of corresponding public safety benefit.
- **Illicit firearms and information sharing:** ADA strongly supports measures to prevent, detect, and disrupt illicit firearms, which pose the greatest risk to community safety. The ADA supports improved information sharing between agencies, including the development of the National Firearms Register, which is intended to provide near-real-time information to law enforcement. ADA will continue to engage constructively with the government to help ensure such systems are accurate, workable, and fit for purpose.
- **Public confidence and education:** ADA notes the Victorian Government's announcement of its intention to establish Outdoor Recreation Victoria as a statutory body to promote outdoor recreation, including hunting, as a legitimate activity. ADA submits that this body, working alongside industry associations, presents an opportunity to improve public understanding, education, and confidence regarding lawful firearm use on public land as part of a holistic approach to public safety.

ADA's experience engaging constructively with government — including advocating for access arrangements for recreational deer hunting in the Snowy River and Errinundra National Parks — demonstrates that good-faith consultation and evidence-based policy development can deliver balanced outcomes that enhance public safety while recognising legitimate firearm use.

ADA remains committed to constructive engagement with the Victorian Government and the Review to support firearms regulation that is effective, proportionate, and commands public confidence.



# 1. Introduction

The Australian Deer Association (ADA) welcomes the opportunity to make a submission to the Rapid Review of Victoria's Firearms Laws (the Review).

ADA acknowledges the serious public safety concerns that have prompted this Review, including the imperative to enhance community safety following recent acts of violent extremism. We support the Victorian Government's commitment to ensuring that firearms laws remain robust, contemporary, and effective in protecting the community.

ADA also acknowledges the Victorian Government's long-standing recognition and support of recreational hunting as a legitimate and regulated activity, and the associated lawful possession and use of firearms for that purpose. Recreational hunting in Victoria operates within a comprehensive statutory and regulatory framework encompassing firearms licensing, game management, animal welfare, and public safety controls.

In this context, ADA emphasises the importance of ensuring that any firearms law reforms are evidence-based, proportionate, and risk-focused, and that they continue to recognise the legitimate needs of law-abiding Victorians who possess and use firearms for lawful purposes, including recreational hunting, wildlife management, and sporting activities.

This submission seeks to assist the Review by providing the perspective of a long-established stakeholder operating within Victoria's firearms regulatory framework, with a demonstrated commitment to safety, compliance, and constructive engagement.



# 2. About the Australian Deer Association

The Australian Deer Association is a national, not-for-profit organisation representing licensed deer hunters across Australia. In Victoria, recreational deer hunting is conducted within a comprehensive and highly regulated framework and contributes to:

- responsible firearms ownership and safe handling practices
- wildlife management and environmental stewardship
- regional economic activity
- compliance with state firearms and game hunting laws

Participation in recreational deer hunting in Victoria requires individuals to hold a valid firearms licence, comply with secure storage and transport requirements, and adhere to strict rules governing firearm use. The Australian Deer Association actively promotes firearms safety education, humane hunting standards, and lawful participation within this regulatory framework.

Through ongoing and consistent engagement with the Victorian Government and relevant agencies, ADA has contributed to policy outcomes that balance public safety, environmental management, and lawful recreational activity. This includes advocacy undertaken in good faith, and supported by evidence, that assisted in the decision to permit recreational deer hunting in the Snowy River and Errinundra National Parks.

ADA submits that this outcome demonstrates how constructive consultation, stakeholder engagement, and evidence-based policy development can deliver balanced outcomes that uphold public safety while recognising legitimate firearm use. The Association views this experience as a model for continued engagement on firearms regulation and related reform.

The Association and its members operate entirely within Victoria's firearms licensing system and have a strong interest in maintaining the integrity and effectiveness of that system.

# 3. Overarching Principles

ADA submits that reforms arising from the Review should be guided by the following principles:

1. **Risk-based regulation:** Regulation should focus on demonstrable risks to public safety, rather than lawful ownership or participation alone.
2. **Proportionality:** Measures should be proportionate to the risks they seek to address and supported by evidence of effectiveness.
3. **System integrity and compliance:** Firearms laws should encourage continued participation in licensing and compliance, rather than unintentionally discouraging lawful ownership.
4. **National consistency with practical flexibility:** National consistency is important, but reforms should be adapted to Victoria's legislative, operational, and community context.
5. **Focus on illicit firearms and criminal misuse:** The greatest public safety gains will be achieved by targeting illegal firearms, trafficking, and criminal misuse, rather than imposing additional burdens on compliant licence holders.



# 4. Response to the Terms of Reference

## 4.1 The number of firearms that can be held by an individual

ADA does not support the introduction of arbitrary numerical limits on the number of firearms that may be held by a licensed individual.

For recreational hunters, firearm ownership is purpose-specific and regulated, rather than discretionary. Different hunting methods, environments, and target species require firearms with distinct characteristics. In Victoria, recreational hunting covers multiple wild deer species and native game birds, each subject to specific regulatory and animal-welfare requirements, including minimum calibre and method standards.

As a result, a single firearm cannot safely or humanely meet all lawful hunting requirements. Hunters may legitimately require different firearms to ensure compliance with animal welfare obligations and safe hunting practices. By way of example, a recreational hunter may lawfully use:

- Numerous shotguns for the hunting of native game birds, where firearm type and method are prescribed by regulation
- Numerous centerfire rifles suitable for the humane harvesting of larger deer species, consistent with minimum calibre, animal welfare standards, and hunting in varied terrain, where firearm suitability, accuracy, and safety considerations differ
- Numerous centerfire rifles suitable for the humane harvesting of medium deer species, consistent with minimum calibre, animal welfare standards, and hunting in varied terrain, where firearm suitability, accuracy, and safety considerations differ
- Numerous centerfire rifles suitable for the humane harvesting of small deer species, consistent with minimum calibre, animal welfare standards, and hunting in varied terrain, where firearm suitability, accuracy, and safety considerations differ
- Numerous smaller caliber rifles or rimfire rifles for marksmanship practice
- Numerous heirlooms that hold significant cultural value to the family



Member survey responses support this purpose-based reality. Survey data indicates that respondents commonly participate in multiple lawful activities, including deer hunting, pest animal control, and target shooting. The principal drivers for owning more than one firearm were different hunting species (89.8 per cent), different hunting methods (70.9 per cent), and different calibres required for safe and appropriate use (72.1 per cent).

There is no evidence that the number of firearms lawfully held by licensed recreational hunters is correlated with violent crime or public safety risk. Existing safeguards — including fit-and-proper-person assessments, secure storage requirements, and ongoing compliance monitoring — already provide effective risk controls.

Survey findings also indicate that arbitrary numerical caps would materially affect lawful participation. For example, 77 per cent of respondents reported that a cap of five firearms would have a severe or significant impact on their lawful activities, with impacts increasing as caps become more restrictive.

ADA submits that firearm ownership limits should not be subject to arbitrary numerical limits that are often set in a political context, not led by evidence. It is noted that caps of up to ten have been newly introduced in New South Wales and the Australian Capital Territory; neither jurisdiction has provided evidence to support its rationale. The rapid review and its endeavour to be data-driven provide an opportunity to reflect this in its recommendations that caps have no impact on community safety.

## **4.2 Firearms categories and emerging technologies**

ADA supports firearms categories that remain fit for purpose and responsive to genuine technological developments.

However, ADA urges caution to ensure that long-established hunting firearms are not captured by category changes, that definitions remain clear and enforceable, and that changes are informed by technical expertise and stakeholder consultation in response to technological developments and are not punitive.

It is also noted that in late 2025, the Victorian government passed additional laws on 3D printing as an emerging technology, to ensure it is not misused and to complement the existing legislative framework on illicit firearms.



### **4.3 Licensing schemes, licence types, and citizenship or residency requirements**

ADA supports strong firearms licensing standards, including comprehensive background checks, fit-and-proper-person assessments, existing appropriate testing arrangements, and ongoing monitoring of licence holders.

ADA notes that Victoria's firearms licensing framework already incorporates multiple safeguards to manage risk at the point of entry and throughout the licence lifecycle. This includes firearms licence testing arrangements for new applicants. ADA further notes that Victoria's firearm licence testing framework has recently undergone an audit and review led by Victoria Police's Licensing and Regulation Division, in consultation with the Victorian Firearms Consultative Committee. This process resulted in an uplift and refinement of an established, proven system, strengthening assessment standards while maintaining a clear, workable pathway for lawful applicants.

ADA submits that this demonstrates the capacity of the existing licensing framework to be continuously improved through evidence-based review and stakeholder consultation, without reliance on blunt eligibility exclusions.

In this context, the ADA urges careful consideration of proposals to make Australian citizenship a mandatory condition for obtaining a firearms licence. A number of recreational hunters lawfully participating in Victoria's regulated hunting framework are permanent residents who are not Australian citizens but who meet all existing eligibility, probity, testing, and compliance requirements.

These individuals have undergone extensive background checks, have satisfied firearms licence testing requirements, and have demonstrated long-term compliance with firearms storage, transport, and hunting regulations. They participate in Victoria's regulated hunting system in the same manner as citizen licence holders and do not present an elevated risk profile.

Introducing a citizenship requirement would have the effect of excluding otherwise compliant and low-risk individuals solely on the basis of citizenship status, rather than behaviour, testing outcomes, or risk indicators. ADA submits that such an approach is unlikely to deliver measurable public safety benefits.

ADA further submits that excluding permanent residents may give rise to unintended consequences, including discouraging engagement with the licensing system, undermining perceptions of fairness, and reducing confidence among lawful participants.

Any changes to licence eligibility settings, including citizenship or residency requirements, should therefore be supported by clear evidence that they address identified risks and complement existing licensing safeguards — including strengthened testing, assessment, and ongoing monitoring — rather than duplicating or displacing them.

## 4.4 Licence duration, renewal requirements, and ongoing monitoring

ADA supports robust licence renewal processes and ongoing monitoring to ensure that firearms licence holders remain fit and proper over the life of their licence.

However, ADA urges caution in relation to proposals to shorten licence duration. For example, reducing the renewal period from five years to three years would materially increase regulatory workload and administrative burden, despite no evidence that such a change would deliver a corresponding improvement in public safety outcomes.

A reduction from five to three years would increase the frequency of licence renewals by approximately 66 per cent on an ongoing basis. This increase would apply across the entire licensed population, including individuals with long-standing records of compliance and no identified risk factors.

Survey results also indicate high levels of lawful participation, with a majority of respondents reporting at least 15 days of regulated hunting or shooting-related activity in 2025. This underscores the importance of ensuring that licensing and renewal arrangements remain workable and do not unintentionally discourage compliance through increased administrative burden.

The resulting increase in processing volumes would place additional pressure on licensing systems and frontline regulatory staff, and divert regulatory and policing resources from intelligence-led monitoring, compliance activities, and illicit firearms enforcement.

In the absence of evidence that shorter licence durations improve public safety outcomes, ADA submits that increasing renewal frequency represents a disproportionate regulatory response with high administrative cost and limited capacity to meaningfully enhance community safety.

**Footnote:** A reduction in licence duration from five years to three years increases renewal frequency by a factor of 5/3. In a stable licensed population, this results in approximately 66 per cent more renewal applications being processed over time, regardless of changes in licence holder behaviour or risk profile.

## 4.5 Strengthening laws relating to illicit firearms

ADA strongly supports efforts to prevent, detect, and disrupt illicit firearms, including illegal manufacture, trafficking and diversion, and possession and use by criminal networks.

ADA emphasises that licensed recreational hunters are not a source of illicit firearms and that policy responses should clearly distinguish between lawful and unlawful markets.

Survey evidence reflects a strong compliance culture among respondents and high levels of engagement with lawful hunting and firearms regulation. ADA submits that the greatest public safety gains will be achieved through measures focused on illicit firearms, including improved tracing and implementation of the National Firearms Register, subject to appropriate safeguards.



## **4.6 Imitation firearms, accessories, and related items**

ADA supports clear, consistent, and enforceable regulation of imitation firearms and accessories and cautions against definitions that may inadvertently capture low-risk items or create confusion for lawful users and retailers.

## **4.7 Use of criminal intelligence in licensing decisions**

ADA acknowledges the value of criminal intelligence in firearms licensing decisions and supports its appropriate use, subject to safeguards that ensure procedural fairness, transparency where possible, and access to review mechanisms.

Survey responses indicate strong support for intelligence-informed licensing decisions: 94 per cent of respondents support using criminal intelligence from state and federal agencies to inform licence applications and renewals.

ADA submits that maintaining fairness and confidence in decision-making is essential to sustaining compliance, and that extends to enabling merit-based reviews on any adverse findings.

## **4.8 Information sharing between agencies**

ADA supports improved information sharing between agencies to strengthen firearms licensing, compliance, and enforcement outcomes, including alignment with nationally consistent systems.

The ADA notes that the National Firearms Register (NFR) is currently under development to provide near-real-time information to law enforcement agencies across jurisdictions. ADA supports the objective of improving the accuracy, timeliness, and accessibility of firearms information to assist operational decision-making and public safety outcomes.

ADA submits that the effectiveness of enhanced information sharing arrangements, including the NFR, will depend on:

- data accuracy and completeness
- clear governance and access controls
- consistency across jurisdictions
- mechanisms to correct errors and review adverse impacts on lawful licence holders

ADA further notes the importance of ensuring that new information-sharing systems are fit for purpose, operationally workable, and do not unintentionally undermine confidence in the firearms licensing framework.

ADA will continue to engage constructively with the Victorian Government and relevant agencies in relation to the development and implementation of the National Firearms Register, to assist in ensuring that its application supports law enforcement objectives while remaining accurate, proportionate, and workable for lawful firearms users.

# 5. Conclusion

ADA supports the objective of enhancing community safety and recognises the seriousness of the matters under consideration in this Review.

This submission, informed by stakeholder survey evidence and operational experience, demonstrates that licensed recreational hunters operate within a strong compliance culture, support intelligence-led, proportionate regulation, and are directly affected by reforms that are neither risk-based nor evidence-driven.

ADA submits that the most effective firearms reforms will be those that:

- focus regulatory and enforcement efforts on illicit firearms and criminal misuse
- strengthen system integrity without discouraging lawful participation
- maintain existing licensing safeguards, including recently improved testing and assessment arrangements
- ensure national systems such as the National Firearms Register are accurate, timely, and fit for purpose
- promote public confidence through transparency, education, and engagement

ADA further submits that initiatives such as the establishment of Outdoor Recreation Victoria provide an opportunity to complement regulatory reform with improved public education and understanding of lawful firearm use, particularly in the context of regulated hunting on public land.





Australian  
**Deer**  
Association

***Hunting deer in Australia is a privilege not a right.***

The Australian Deer Association exists to ensure our hunting heritage is protected for future generations. By joining ADA you help support Australia's leading hunting organisation, helping you continue to enjoy your pastime.

By joining the ADA, you are helping support a non for profit, membership organisation, focused on representing deer hunters nationwide to ensure our pastime continues for future generations.

Not only does ADA give you a genuine reason to acquire, public liability and firearms insurance. More importantly a membership to the ADA gives you a community. Including access to educational events, branch camps and opportunities to learn from and enjoy the company of a like-minded group of hunters, outdoorsmen/woman and people who genuinely care about and advocate for hunting wild deer in wild places.





# Contact Information

## **Australian Deer Association**

**Sean Kilkenny**

Deer Management & Advocacy

Email:

**[sean.kilkenny@austdeer.asn.au](mailto:sean.kilkenny@austdeer.asn.au)**

Phone:

**+61 475 238 219**

Submitted on behalf of:

**Australian Deer Association**

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