

**National Firearms Register consultation**  
**- Injury Matters Submission, April 2023 -**

**Question 1: What capabilities should a National Firearms Register provide to government regulators and law enforcement?**

Injury Matters agrees with the Consultation Paper's articulation that for the National Firearms Register to achieve its primary objective of preserving community and police safety the Register needs to;

- *'Operate in near real-time'.*
- *'Provide details of licence holder'.*
- *'Provide a single [shared] firearm record that uniquely identifies each firearm in Australia'.*
- *'Be interoperable between jurisdictions'.*
- *'Link firearms and individuals'.*
- *'Leverage existing systems where possible'.*
- *'Provide notification of cross-jurisdictional movement of firearms', including the ability to 'track the movement of firearms between entities from import or manufacture to export or destruction'.*
- *Incorporate 'an alert or notification function for prescribed high risk information or events, for example alerts for rejected, suspended or cancelled licences, interstate transfers, detected non-compliance with licence conditions, stolen firearms and ongoing probity checks'.*

In addition to the above capabilities, Injury Matters supports the need for the Register to identify the location where the firearm/s are stored and the last time the identified storage location was checked.

Collectively these capabilities would enable government regulators and law enforcement officials to assess a person's suitability to hold a firearms licence, identify the movement of firearms in a timely manner and support law enforcement in responding to firearms-related (or potential firearms-related) incidents.

**Question 2: Should a National Firearms Register trace more than firearms, for example firearms accessories, magazines, parts and ammunition?**

The ability to trace all firearm-related parts would greatly assist in understanding the true prevalence of firearms within the Australian community, however given that it is not currently mandated to register all firearm-related parts this is a huge barrier.

Injury Matters supports the tracing of items that are currently identified on existing registers (i.e., sound suppressors and silencers) within the new National Firearms Register. In the long term, the Register should work to incorporate the tracing of other firearms accessories, magazines, parts and ammunition, however this should not be a barrier to implementing the core functions of the Register as soon as possible.

**Question 3: Do you have any comments on the benefits a National Firearms Register will offer to law enforcement and community safety, including any broader benefits that should be explored?**

The comprehensive, accurate and timely information that will be available within the National Firearms Register will be pivotal in allowing law enforcement officials and government regulators to make decisions that are in the best interest of public safety. As outlined in the primary objective of the Register, this access to a central and reliable data source will be extremely valuable in assessing potential risk and protecting the Australian community from firearm-related harm.

The additional benefit of the Register in monitoring the movement of firearms themselves and individuals who possess firearms will also be valuable in enabling police to be better informed in their responses to firearms-related incidents.

Currently identifying the movement of firearms within the illicit market is challenging, however by the Register providing better information on firearms movements this will assist in identifying illicit movements and allow law enforcement to take action to locate and seize the firearms, ultimately improving the safety of the community.

Although an increase in resources may be required in the short term, the opportunity to streamline processes and systems via the central Register should enable efficiencies in the long term.

The Register will provide value in identifying and monitoring firearms and firearm licences, however it will also provide great insight into firearm-related issues such as intentional self-harm and domestic violence. In Australia in 2021, 155 individuals died due to a firearm-related self-harm incident and 27 died due to a firearm-related violence incident. With the ability to increase monitoring via the Register, at-risk situations can be identified and interventions can be enacted to reduce the likelihood of the incidents occurring.

In addition to the lives lost due to a firearms-related incident, there are also an unquantifiable number of Australians who live in fear due to the presence of firearms and/or threats of violence. It is important that we don't ignore the benefit that the National Firearms Register could have in these instances.

The detailed database and anticipated improved transparency of the dataset will also provide significant opportunities for in-depth data analysis to inform policy reform and other harm prevention initiatives.

Given that it has been 27 years since all Australian jurisdictions signed the National Firearms Agreement and agreed to a nationwide registration of all firearms, we commend National Cabinet and the Police Ministers for ensuring this consultation informs the development of the most effective Register possible.

**Question 4: What other capabilities could a National Firearms Register have that would be of benefit to the community, including to lawful firearms owners?**

The National Firearms Register will become a very comprehensive dataset that should be utilised beyond the primary objective of the Register.

Currently there are significant challenges in accessing reliable and comparable national data relating to firearms within the community. This includes the need to submit applications within each state or territory's information access legislation which may be denied. To further increase the value of the new Register, de-identified data should be made available for policy and research purposes, and/or routine reports should be made publicly available to enable transparency about the number of firearms in the community and the type of licences approved.

Injury Matters agree with the commentary within the Consultation Paper regarding the role that authorised firearms dealers have in community safety and how the Register could strengthen their role. We do however note that the proposed modifications in how authorised firearms dealers engage with firearms registries needs to be complemented with additional resourcing, support and potential upskilling of the dealers.

The National Firearms Register will be a significant step in a nationwide approach to firearm safety. Although not a direct correlation, there is potential for the success of this national approach to provide a pathway to the modification of other firearm safety measures to become national. For instance, Western Australia is currently conducting a significant firearms policy reform, which could provide evidence for additional nationwide initiatives to be rolled out.

In regard to lawful firearms owners themselves, it is assumed that the National Firearms Register will be complemented with streamlined registration and licence renewal processes, which would be well received by individual owners as currently these processes can be administratively cumbersome.

**Question 5: Do you have any comments on the creation of a verification service to support licensing and permit systems?**

Injury Matters notes that the creation of a verification service to support licensing and permit systems would be a natural complementary service to the new National Firearms Register, however the inclusion of this should not delay the Register going live. This component could be added subsequently.

Firearms dealers' ability to access the register to verify licences is essential.

**Question 6: Do you think trusted entities should be able to electronically communicate with firearms registries, if so, what capabilities should be available to trusted entities such as firearms dealers?**

Without a clear indication of what is considered a 'trusted entity', Injury Matters cannot comment on what capabilities the said 'trusted entities' should have access to.

Despite this, given the significant dataset that will be available within the Register it would appear feasible for external parties to have access to those data fields that would influence their work and/or decision-making process. An example of this may be gun shooting ranges having access to verify licences.

**Question 7: Do you have any comments on the information proposed to be held by a National Firearms Register?**

All of the 'firearms information', 'licence holder information' and 'firearms/licence holder link information' outlined in the Consultation Paper appear essential to the Registers success.

Injury Matters does not foresee any additional security risk within the National Firearm Register in comparison to the risks that exist across the eight existing different systems.

However, it is important to note that the National Firearms Register will only be as strong as the weakest source of state or territory data. Therefore, it is vital that the Federal Government supports appropriate resourcing and monitoring to ensure any delays or potential errors are resolved. This will then support a strong national system.