SRMBOK

Security Risk Management Body Of Knowledge

AUSTRALIAN CAPITAL TERRITORY

Firearms Licensing Risk Assessment

Version 0.3 for public consultation



PREPARED BY

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STATUS

Not commissioned by the ACT Government

Declaration of interests

This assessment was not asked for or paid for by the ACT Government or by any other body. Julian Talbot wrote it for SRMBOK Pty Ltd, on his own initiative. It is a desktop review of public sources.

The author declares these interests:

- I have held an ACT firearms licence since 2021.
- I have served as an office holder of sport shooting associations. They include the Sporting Shooters' Association of Australia (ACT) and the ACT branch of IPSC Australia.
- I am the author of *The RMBOK Guide to Shooting Range Design, Certification and Operation*, due for publication in November 2026.
- I am a director of SRMBOK Pty Ltd, which publishes the Security Risk Management Body of Knowledge and related products.
- I am a co-founder and director of SECTARA Pty Ltd, which supplies the software used to keep the risk register.

Treatment T-14 proposes public funding for shooting associations and clubs. My association offices bear on that proposal. For that reason the assessment names no recipient. It recommends that any grant be awarded by an open process against published criteria.

Readers can test the assessment against its sources. Each factual claim has a footnote, and Annex I lists every reference. Annex G sets out how the ratings will be tested with the Registry and other stakeholders.

Brief for Members

THE BOTTOM LINE

The ACT firearms licensing system works well, and harm from licensed firearms is low. The three highest risks are suicide by a licensee, illicit firearms, and strain on the Firearms Registry. The Bill before the Assembly does not treat the first, treats part of the second and adds to the third.

The three High risks

R1

A licensee dies by suicide with their own firearm.

HIGH now → MEDIUM after treatment

TREATED BY

T-03 T-14 T-01 T-13

R2

A person is shot with a firearm that was made, converted or imported outside the licensing system.

HIGH now → MEDIUM after treatment

TREATED BY

T-08 T-10

R3

Registry staff are moved from core checks to run the reforms, and those checks weaken.

HIGH now → MEDIUM after treatment

TREATED BY

T-06 T-14 T-12

What the Bill treats and what it does not

MEASURE	RISKS IT REDUCES	RISKS IT ADDS TO	MANAGED BY
Limit of five firearms, or ten or more for listed reasons	R13	R3, R20 and R25	T-06, T-07 and T-12
Offence of having a digital blueprint for a firearm	R2 and R17, in part	None	T-08
National firearms buyback	None directly	R3 and R20	T-06 and T-12
No measure in the Bill	None	R1 and R5 are left as they are	T-03 and T-14

Five asks for the December debate

Each ask can be met by an amendment or by a commitment from the Minister during debate. Each one is set out in full in Annex K.

1

Fund the Registry for the new work (T-06).

The Bill adds approvals, surrenders and prohibition orders to the Registry's load. Ask for funded positions and for set staff numbers in vetting, intelligence and compliance. This treats R3.

2

Set up voluntary temporary storage (T-03).

Give a licensee in crisis a safe place to leave firearms for a time, with no cost to their licence. This treats R1, the highest-rated harm to a person, which the Bill does not touch.

3

Publish the baseline before the limits start (T-12).

Ask for yearly figures on firearm deaths, thefts, seizures, inspections and Registry times, with the first set out before the Bill starts. Without them no one can tell if the reforms work.

4

Check household access and publish the approval rules (T-07).

The limit applies to each licensee, so a household can keep its firearms by adding licensees. Ask the Registrar to assess the household and to publish the rules for approvals above the limit. This treats R25.

5

Commit to a funded club partnership by open grant (T-14).

Clubs train new licensees and see them most often. Ask for funding, awarded by open process, for training, member support and a link to police. This helps to treat 15 of the 26 risks.

The assessment makes ten findings and proposes 14 treatments. The Executive Summary starts on the page after the contents.

Contents

Declaration of interests 2

Brief for Members 3

Executive summary 7

Introduction 11

Risk assessment 12

Key findings 14

- Finding 1: Licensees have been checked, and most firearm violence involves people without a licence 14
- Finding 2: Clubs and associations are the gateway to licensing and are not resourced for that role 15
- Finding 3: Suitability is checked at fixed points, not continuously 16
- Finding 4: Self-harm is the main way firearms kill, and the least addressed 16
- Finding 5: The proposed limit on firearm numbers treats one of the 26 risks directly 17
- Finding 6: The register is a manual, paper-based system 18
- Finding 7: Storage checks are infrequent, and their results are not published 18
- Finding 8: The Registry is under strain before the reforms start 19
- Finding 9: Published data are not enough to judge the system 19
- Finding 10: Privately made firearms sit outside the licensing system 20

Risk treatment 21

- Existing risk treatments 21
- Additional risk treatments 21

Annex A: Background 25

- Scope 25
- Context 26
- Risk Tolerance Criteria 31

Annex B: Asset criticality assessment 32

Annex C: Threat / hazard assessment 34

Annex D: Controls assessment 37

Annex E: Risk register 41

Annex F: Assessment methodology 50

- Asset criticality criteria 50
- Threat assessment criteria 50
- Hazard event criteria 51
- Control effectiveness criteria 51
- Risk assessment criteria 52

Annex G: Validation plan 54

Annex H: The Bill and the risks 55

Annex I: Documents referenced 56

Annex J: Risk treatment plan 60

Annex K: Treatment cards 65

- 1. Continuous suitability checking and supportive early intervention 66

2. Intelligence-sharing protocol 67
3. Health and wellbeing pathway with voluntary temporary storage 68
4. Risk-based storage inspection and review of storage standards 69
5. Register digitisation, audit and security 70
6. Registry funding for the reform workload 71
7. Household access assessment and published approval criteria 72
8. Digital blueprint offence and reconciliation of parts and ammunition sales 73
9. Dealer, club and transit security review 74
10. ACT and NSW data exchange and alignment 75
11. Incident reporting and refresher safety training 76
12. Published performance measures and independent review 77
13. Consultative forum and confidential concern line 78
14. Funded partnership with shooting associations and clubs 79

Annex L: SECTARA 80

Annex M: Disclaimer 80

Annex N: Terms and definitions 81

Annex O: Assessor qualifications 83

Executive summary

7,315	22,857	26	3	0	14
licensees	registered firearms	risks assessed	rated High	rated Very High	treatments proposed

SRMBOK Pty Ltd made this risk assessment of firearms licensing in the Australian Capital Territory (ACT). It looks at how firearms that are, or were, lawfully held can kill, injure or frighten people. It also looks at how well the licensing system stops that harm. It is written to protect the community, and it covers the ten years from 2027 to 2036.

The work is a desktop review of laws, parliamentary records, official statistics and published research. It was not commissioned by the ACT Government. It follows ISO 31000:2018 and the Security Risk Management Body of Knowledge. Each rating rests on the evidence for the ACT and for licensees. The ratings will be tested with the Registrar of Firearms, ACT Policing, the ACT Government and other stakeholders.

The ACT starts from a strong position. In December 2025 it had 7,315 licensees and 22,857 registered firearms.[1] Each licensee passed a suitability check when the Registrar last decided on their licence. Reported firearm thefts fell from 28 in 2018 to 3 in 2024.[2] The ACT recorded no homicides in 2024–25.[3] The system is strongest at the point of entry. It is weaker at seeing a change in a licensee's life after a licence is issued.

The assessment found 26 risks. None is rated Very High. Three are rated High:

R1	Suicide by a licensee with their own firearm	HIGH
R2	Illicit manufacture, conversion or import of firearms	HIGH
R3	Registry capacity drawn from core controls	HIGH

Twenty-two risks are rated Medium. They include a mass-casualty attack by a licensee, a family violence homicide by a licensee, and theft of firearms for use in crime. Each of these is rare or unlikely in any one year in the ACT. Each would cause major or severe harm. One risk is rated Low.

The assessment makes ten findings. The five that matter most are:

- **Licensees have been checked.** Each licensee was screened when the Registrar last decided on their licence. In the national homicide record, most offenders who used a firearm had no licence.[4] Licensees were still a larger share of those offenders than of the adult population.
- **Clubs and associations are the gateway to licensing.** They run the entry training and see licensees most often. The work rests on volunteers.
- **Suitability is checked at fixed points.** Between renewals, the Registry relies on others to tell it that a licensee has become a risk.

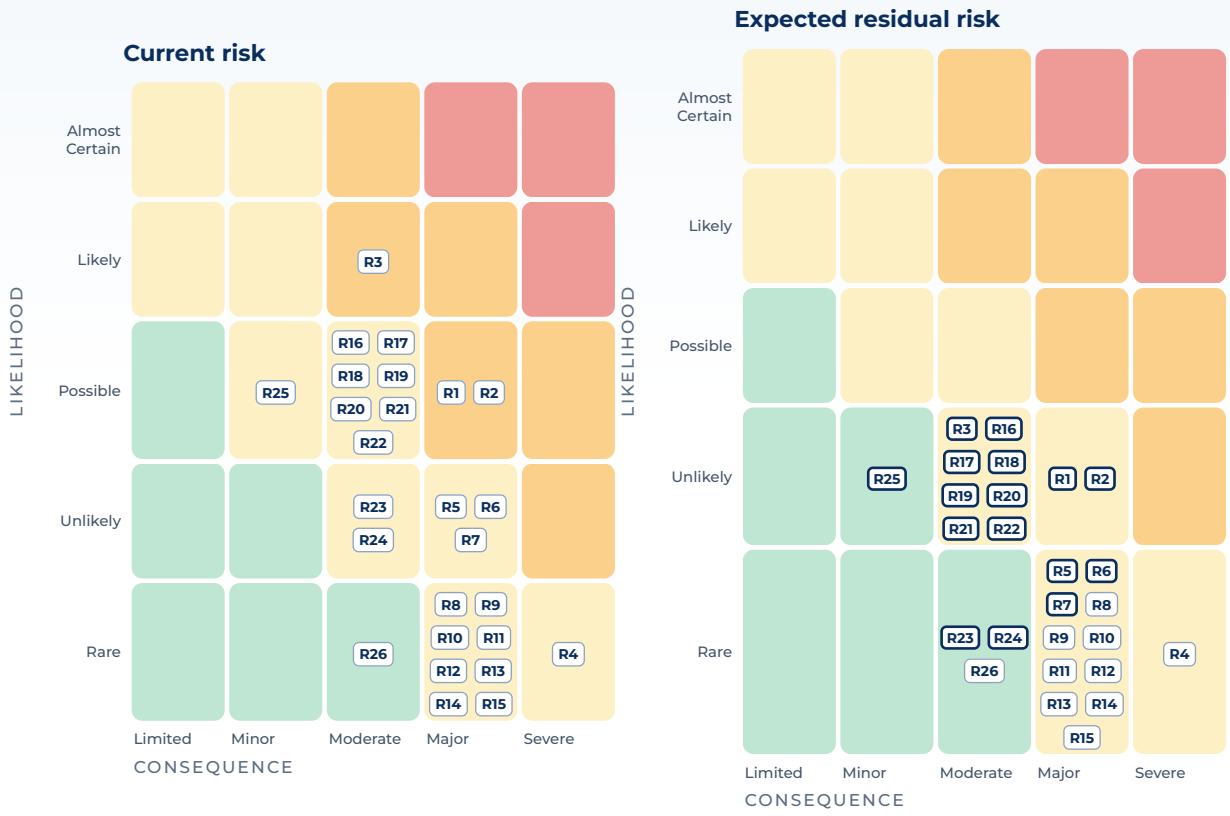
1 ACT Government, Submission 066 to the Standing Committee on Legal Affairs (2026) 5–6, table 1.
2 The Australia Institute, *Firearm theft in Australia* (October 2025) 16–17, 22 (figure 15, table 6), from a freedom of information request to the Australian Federal Police.
3 Australian Institute of Criminology, *Homicide in Australia 2024–25* (Statistical Report 58, 2026) 3–4, table 1.
4 S Bricknell, *Criminal use of handguns in Australia* (AIC Trends & issues no 361, 2008) 4.

- **Self-harm is the main way firearms kill, and it gets the least attention.** It is uncommon. On a Queensland rate it comes to less than one death a year among ACT licensees.[5] It is still the highest-rated harm to a person, and no 2026 reform measure is aimed at it.
- **The proposed limit on firearm numbers treats one of the 26 risks directly.** It cuts the number of firearms that can be lost in one theft. It does not deal with suitability, household access or storage. It adds risks through extra household licences and extra work for the Registry.

5 H Klieve, J Sveticic and D De Leo, 'Who uses firearms as a means of suicide?' (2009) 7 *BMC Medicine* 52.

ACT firearms licensing: risk matrix

26 risks plotted by likelihood in any one year and by consequence. Left: current risk. Right: expected residual risk after the 14 proposed treatments.



Risk key (current rating → residual rating)

R1	Suicide by a licensee with their own firearm	HIGH → MEDIUM	**R14**	Licence or permit obtained by deception	MEDIUM → MEDIUM
R2	Illicit manufacture, conversion or import of firearms	HIGH → MEDIUM	**R15**	Hunting or pest control incident	MEDIUM → MEDIUM
R3	Registry capacity drawn from core controls	HIGH → MEDIUM	**R16**	Threat or coercion with a lawfully held firearm	MEDIUM → MEDIUM
R4	Mass-casualty attack by a licensee or authorised user	MEDIUM → MEDIUM	**R17**	Ammunition or controlled parts reaching unlicensed people	MEDIUM → MEDIUM
R5	Suicide by a household member with a licensee's firearm	MEDIUM → MEDIUM	**R18**	Cross-border movement exploiting regime differences	MEDIUM → MEDIUM
R6	Residential firearm theft and later criminal use	MEDIUM → MEDIUM	**R19**	Unintentional discharge in handling, storage or transport	MEDIUM → MEDIUM
R7	Theft from a dealer, club or in transit	MEDIUM → MEDIUM	**R20**	Firearms leaving the registered system	MEDIUM → MEDIUM
R8	Family violence homicide or injury by a licensee	MEDIUM → MEDIUM	**R21**	Reduced reporting of concerns	MEDIUM → MEDIUM
R9	Shooting by a licensee in a non-domestic dispute	MEDIUM → MEDIUM	**R22**	Erosion of club and association capacity	MEDIUM → MEDIUM
R10	Shooting of police or responders by a licensee	MEDIUM → MEDIUM	**R23**	Diversion by a licensee or dealer	MEDIUM → LOW
R11	Use of a licensee's firearm by an unlicensed household member against another person	MEDIUM → MEDIUM	**R24**	Range incident	MEDIUM → LOW
R12	Unintentional discharge by a child	MEDIUM → MEDIUM	**R25**	Additional household licences widening access in the home	MEDIUM → LOW
R13	Loss of a large holding in a single theft	MEDIUM → MEDIUM	**R26**	Incident involving a minor or supervised novice	LOW → LOW

The assessment proposes 14 treatments. The six with the widest effect are:

T-14	Funded partnership with shooting associations and clubs
T-01	Continuous suitability checking and supportive early intervention
T-03	Health and wellbeing pathway with voluntary temporary storage
T-04	Risk-based storage inspection and review of storage standards
T-05	Register digitisation, audit and security
T-06	Registry funding for the reform workload

With these treatments, the three High risks fall to Medium and three Medium risks fall to Low. Suicide by a licensee stays the most serious harm to a person. Licensing controls cannot remove it alone. It needs steady work by health and community services, clubs and associations, and the regulator.

The risk register (Annex E) lists each risk with its source, controls, rating and treatments. Annex K gives a one-page card for each treatment.

Introduction

Having a firearm in the ACT is a privilege. It depends on the overriding need to keep the public safe. That principle is set out in section 5 of the *Firearms Act 1996* (ACT).[6] It is the objective against which this assessment measures risk.

The assessment follows the changes to firearm laws that came after the Bondi Beach terror attack of 14 December 2025.[7] The next day, National Cabinet asked ministers to develop reform options.[8] An updated National Firearms Agreement was signed on 26 August 2026.[9] In the ACT, the Assembly passed a firearm prohibition order scheme in October 2026.[10] The Firearms (Public Safety) Amendment Bill 2026 was presented on 4 February 2026 and is before the Assembly. The next sitting week is 1 to 3 December 2026.[11] Choices made now will shape firearm regulation in the ACT for the next ten years.

The scope covers firearms held under ACT licences and the controls that apply to them. These are licensing, permits to acquire, registration, storage, transport, use, suspension and enforcement. It also covers theft, diversion and illicit manufacture where licensed firearms, controlled parts or ammunition are involved, and the risks that changes to the law create. Firearms held by police and the Australian Defence Force are out of scope. So are items covered by the *Prohibited Weapons Act 1996* (ACT).

The assessment uses the process in ISO 31000:2018 *Risk management – Guidelines*.[12] The external context was examined with the PESTLE framework, the internal context with MORTAR, and the risk management context with a SWOT analysis. Annex A sets these out.

Risk statements use the CASE format. Each names the Consequence, the Asset at risk, the Source of the risk and the Event. Findings use the 4C format (Condition, Criteria, Consequence and Cause) under plain labels. Treatments use the 4A format: Appropriate, Actionable, Achievable and Agreed.

This is a desktop assessment based on public sources. No interviews or site inspections were done. The ratings are the assessor's judgement against the criteria in Annex F. Annex G sets out how they will be tested with stakeholders.

6 *Firearms Act 1996* (ACT) s 5(1)(a).
7 'The Bondi Attack' (2026) 19(3) *CTC Sentinel*, citing the police statement of facts; SBS News, 30 April 2026 (media).
8 Prime Minister of Australia, 'Meeting of National Cabinet' (media release, 15 December 2025).
9 Prime Minister of Australia, 'Meeting of National Cabinet' (media release, 26 August 2026).
10 *Firearms (Firearm Prohibition Orders) Amendment Act 2026* (ACT) (A2026-19) s 2, inserting ss 183F–183ZZQ. Notified 9 November 2026.
11 ACT Legislation Register, Firearms (Public Safety) Amendment Bill 2026, status at 23 November 2026; cl 2 (commencement). ACT Legislative Assembly sitting calendar 2026, sitting week 12.
12 ISO 31000:2018 *Risk management – Guidelines*.

Risk assessment

Firearms carry risk. The ACT manages that risk through a licensing system that has kept measured firearm harm low. This assessment asks where the remaining risk lies, and whether current and proposed controls are aimed at it.

The assessment found and rated 26 risks. Annex E lists them. They fall into five groups: harm by a licensee, access by other people to a licensee's firearms, diversion to the illicit market, unintentional harm in lawful use, and risks created by changes to the law.

Likelihood is the chance that the event happens in the ACT in any one year, with the consequence described. The probability column of the likelihood table governs each rating (Annex F). Ratings draw on the ACT record, and on national rates applied to the ACT's 7,315 licensees. No rating is precautionary. Where the evidence shows an event is rare, it is rated Rare, and the harm it would cause is rated on its own scale.

No risk is rated Very High. Three risks are rated High. Risks are numbered R1 to R26 in order of rating:

R1	Suicide by a licensee with their own firearm	HIGH
R2	Illicit manufacture, conversion or import of firearms	HIGH
R3	Registry capacity drawn from core controls	HIGH

Twenty-two risks are rated Medium:

R4	Mass-casualty attack by a licensee or authorised user	MEDIUM
R5	Suicide by a household member with a licensee's firearm	MEDIUM
R6	Residential firearm theft and later criminal use	MEDIUM
R7	Theft from a dealer, club or in transit	MEDIUM
R8	Family violence homicide or injury by a licensee	MEDIUM
R9	Shooting by a licensee in a non-domestic dispute	MEDIUM
R10	Shooting of police or responders by a licensee	MEDIUM
R11	Use of a licensee's firearm by an unlicensed household member against another person	MEDIUM
R12	Unintentional discharge by a child	MEDIUM
R13	Loss of a large holding in a single theft	MEDIUM
R14	Licence or permit obtained by deception	MEDIUM
R15	Hunting or pest control incident	MEDIUM
R16	Threat or coercion with a lawfully held firearm	MEDIUM
R17	Ammunition or controlled parts reaching unlicensed people	MEDIUM
R18	Cross-border movement exploiting regime differences	MEDIUM

R19	Unintentional discharge in handling, storage or transport	MEDIUM
R20	Firearms leaving the registered system	MEDIUM
R21	Reduced reporting of concerns	MEDIUM
R22	Erosion of club and association capacity	MEDIUM
R23	Diversion by a licensee or dealer	MEDIUM
R24	Range incident	MEDIUM
R25	Additional household licences widening access in the home	MEDIUM

The last risk, an incident involving a minor or supervised novice (R26), is rated Low. It is within tolerance.

Four features of the risk profile shape the treatments.

- **Most firearm risk lies outside the licensed population.** Each risk of a licensee using a firearm to kill or injure another person is rated Rare. The risk from firearms made, converted or imported outside the licensing system (R2) is rated High. ACT Policing responded to ten shooting incidents in 2025.[13]
- **The highest-rated harm to a person is self-harm.** Suicide by a licensee (R1) is uncommon and is rated Possible in any one year. It is rated High because a life is lost when it happens. It is also the harm that current and proposed controls address least.
- **The rarest event has the most severe consequence.** A mass-casualty attack by a licensee (R4) is rated Medium because it is rare in a population this size. Its consequence is rated Severe. It is treated as a priority. The same treatments that cut the more frequent risks also cut this one: continuous suitability checks, shared intelligence and a licensed community that reports concerns.
- **Changes to the law carry risk of their own.** Five risks come from the reforms. One of them, Registry staff drawn from core controls (R3), is rated High.

How sensitive the ratings are

Two Medium ratings sit close to a boundary. The Bondi attack shows that a licensee has carried out a mass-casualty attack in a similar jurisdiction.[14] Published reports say both attackers used firearms that one of them lawfully held.[15] On the historical column of the likelihood table that points to Unlikely. On the probability column, which governs, the chance of either event in the ACT in any one year is under 10 per cent, which is Rare.

R4.	If rated Unlikely, R4 would be High (Unlikely and Severe).
R11.	If rated Unlikely, R11 would stay Medium (Unlikely and Major).

R2 was rated Likely and Moderate in version 0.2. It is now rated Possible and Major, because a shooting with an illicit firearm can kill. It stays High. This puts R2 on the same consequence scale as the risks of a licensee shooting another person (R8 to R10).

13 ACT Policing, Submission 052.1 to the Standing Committee on Legal Affairs (April 2026) 3.
14 ABC News, 16 December 2025 (media), reporting the NSW Police Commissioner.
15 'The Bondi Attack' (2026) 19(3) *CTC Sentinel*; ABC News, 16 December 2025 (media).

Key findings

The assessment makes ten findings. Each starts with a short summary. It then sets out what we found, what should apply, why it matters and why it happened. Annex N maps these labels to the 4C format.

FINDING 1

1 Licensees have been checked, and most firearm violence involves people without a licence

IN SHORT

Every licensee has passed a background check. Most people who kill with a firearm have no licence. Rules that fall on all licensees alike put most of the cost on people who have already been checked.

WHAT WE FOUND. To get or renew a licence in the ACT, a person must pass a suitability check.[16] Under section 19 of the *Firearms Act 1996* (ACT), the Registrar must refuse a person who, in the last ten years, was found guilty of a prescribed offence. The same applies to a person who was under a final protection order or a firearm prohibition order.[17] A prescribed offence is one that involves firearms, violence, drugs, alcohol or weapons and carries more than one year in prison.[18] Under section 18, the Registrar must also weigh other matters, such as lesser offences of that kind and interim protection orders. Those matters do not bar a licence.[19] So each licensee was clear of the section 19 bars when the Registrar last decided on their licence. The rest of the community has not been checked in this way.

National data fit this picture. From 1989–90 to 2005–06, 15 per cent of offenders who used a firearm in a homicide held a licence. Only 11 per cent of the firearms were registered.[20] ACT Policing responded to ten shooting incidents in 2025. Its intelligence linked a number of them to outlaw motorcycle gangs.[21]

The check has limits. It looks back from the date of the last decision, so it misses what happens after that (Finding 3). In 2001 about 5 per cent of adults held a firearms licence.[22] So 15 per cent is about three times their share. A check does not stop every attack. One of the two Bondi attackers held a licence.[23] This assessment found no Australian study that compares how often licensees offend with how often other people do. The ACT does not publish firearm crime by licence status.

WHAT SHOULD APPLY. The Act puts public safety first.[24] ISO 31000 advises weighing the benefit of a treatment against its cost. It lists removing the source of a risk as one option.[25] The *Human Rights Act 2004* (ACT) does not include a right to own a firearm. It does protect privacy and reputation, which checks and

16 *Firearms Act 1996* (ACT) ss 17–19.
17 *Firearms Act 1996* (ACT) ss 17(2)(b), 19(1)(b). Section 19 excepts a protection order that was revoked, overturned on appeal or that permits firearms. A court that makes a personal protection order can order that a licence is not suspended or cancelled, and the Registrar must then reassess suitability: *Personal Violence Act 2016* (ACT) ss 36(3), 37(3); *Firearms Act 1996* (ACT) s 81A.
18 *Firearms Act 1996* (ACT) s 18(2).
19 *Firearms Act 1996* (ACT) ss 17(2)(a), 18(1).
20 S Bricknell, *Criminal use of handguns in Australia* (AIC Trends & issues no 361, 2008) 4.
21 ACT Policing, Submission 052.1 to the Standing Committee on Legal Affairs (April 2026) 3.
22 J Mouzos and M Borzycki (AIC Trends & issues no 312, 2006), citing J Mouzos, *Homicide in Australia: 2000–2001 National Homicide Monitoring Program annual report* (2002).
23 ABC News, 16 December 2025 (media), reporting the NSW Police Commissioner.
24 *Firearms Act 1996* (ACT) s 5(1)(a).
25 ISO 31000:2018 cl 6.5.2.

searches can limit.[26] A limit on a right must be reasonable and justified. One test is whether a less restrictive way would work.[27]

WHY IT MATTERS. Rules that fall on every licensee alike put most of their cost on people who have already been checked. They remove little of the risk. Each risk of a licensee using a firearm to kill or injure another person (R4, R8, R9 and R10) is rated Rare. The three High risks come from suicide, from illicit firearms and from strain on the Registry (R1 to R3).

WHY IT HAPPENED. Firearm policy has been shaped by rare and shocking attacks by licensed people. The data that would show where firearm harm comes from, by licence and registration status, are not published.

2

FINDING 2

Clubs and associations are the gateway to licensing and are not resourced for that role

IN SHORT

Most licensees come into the system through a shooting club. Clubs train them and see them most often. This work rests on volunteers.

WHAT WE FOUND. A first-time applicant must complete an approved firearms training and safety course. Shooting clubs and authorised instructors run the course.[28] A sport or target shooting licence needs active membership of an approved club.[29] Clubs must tell the Registrar about changes in membership and lodge yearly returns.[30]

The Sporting Shooters' Association of Australia (ACT), known as SSAA ACT, reported 5,446 members in February 2026. It describes its range complex as privately funded and owned.[31] It states that it runs on volunteers.[32] The ACT had 7,315 licensees in December 2025.[33] Not every club member is an ACT licensee.

After a licence is issued, a licensee's regular contact with the system is at the club and on the range. The Registry sees a licensee by appointment, to issue or renew a licence.[34] One witness told the Assembly committee that yearly compliance checks were "probably less than desirable".[35] This assessment found no public funding for the training and supervision that clubs provide.

WHAT SHOULD APPLY. The Act makes club membership a condition of the genuine reason of sport or target shooting.[36] The Regulation puts reporting duties on clubs.[37] A control that a system depends on needs resources to match that dependence.

WHY IT MATTERS. Entry training, supervision, peer support, storage advice and early reporting of concerns all rest on volunteers. That capacity is not assured (R22). Chances to reach licensees on wellbeing, refresher training, storage and changes in the law are missed. Clubs and associations can help to reduce 15 of the 26 risks. They reach more licensees, more often, than the Registry or police do. This assessment judges them to be the most direct way the ACT Government can influence how licensees behave.

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26 *Human Rights Act 2004* (ACT) s 12.
27 *Human Rights Act 2004* (ACT) s 28(1), (2)(e).
28 ACT Policing, 'Firearms licences' (web page); *Firearms Act 1996* (ACT) ss 20, 58(2)(c).
29 *Firearms Act 1996* (ACT) table 61, item 1.
30 *Firearms Regulation 2008* (ACT) s 8.
31 Sporting Shooters' Association of Australia (ACT) Inc, Submission 069 to the Standing Committee on Legal Affairs (2026) 11.
32 SSAA ACT, 'Volunteering' (web page).
33 ACT Government, Submission 066 to the Standing Committee on Legal Affairs (2026) 5–6, table 1.
34 ACT Policing, 'ACT Firearms Registry' (web page).
35 Standing Committee on Legal Affairs, Proof Transcript of Evidence, 21 April 2026, 21 (Mr S Adams, private witness).
36 *Firearms Act 1996* (ACT) table 61, item 1.
37 *Firearms Regulation 2008* (ACT) s 8.

WHY IT HAPPENED. Clubs and associations are treated as regulated bodies, not as delivery partners. Public funding goes to the Registry and police and, under the 2026 reforms, to the buyback.

3 FINDING 3 Suitability is checked at fixed points, not continuously

IN SHORT

A licensee is checked when a licence is issued, and again when it is renewed. In between, the Registry waits to be told if things change.

WHAT WE FOUND. The Registrar tests suitability when a licence is issued and when it is renewed.[38] Between those points, the Registry learns of a change only when someone reports it. That can be police, a court, a health worker, a club or a member of the public. ACT Policing told the Assembly committee that the register is a manual system.[39] A manual register cannot be matched each day against police, court and intelligence records.

WHAT SHOULD APPLY. The Act puts public safety first.[40] The Registrar must be satisfied that a licensee is a suitable person.[41] Under the 2026 National Firearms Agreement, the Commonwealth will share criminal intelligence with the States and Territories.[42]

WHY IT MATTERS. A person who becomes unsuitable can keep their firearms. That lasts until someone reports it or the licence comes up for renewal. This feeds each risk of a licensee harming themselves or others (R1, R4, R8, R9, R10 and R16).

WHY IT HAPPENED. The licensing model was built around renewal at set times. The register is manual. So links to court, health and intelligence records depend on people passing facts on.

4 FINDING 4 Self-harm is the main way firearms kill, and the least addressed

IN SHORT

Suicide is the main way firearms kill in Australia. It is uncommon among licensees, but it is the highest-rated harm to a person in this assessment. No reform measure is aimed at it.

WHAT WE FOUND. Suicide made up 77 per cent of firearm deaths in Australia from 1991 to 2001.[43] It is still uncommon. Firearms were the method in 6.2 per cent of suicides in 2014.[44] This assessment could not open a more recent official figure for either measure. A Queensland study of 1997 to 2004 found about 11 firearm suicides a year for each 100,000 current licensees. That was about ten times the rate for people who had never held a licence.[45]

38 *Firearms Act 1996* (ACT) ss 17–19.
39 Standing Committee on Legal Affairs, Proof Transcript of Evidence, 21 April 2026, 54 (Superintendent R Breiner, ACT Policing).
40 *Firearms Act 1996* (ACT) s 5(1)(a).
41 *Firearms Act 1996* (ACT) ss 17–19.
42 Prime Minister of Australia, 'Meeting of National Cabinet' (media release, 26 August 2026).
43 J Mouzos and C Rushforth, *Firearm related deaths in Australia, 1991–2001* (AIC Trends & issues no 269, 2003).
44 Australian Bureau of Statistics, *Causes of Death, Australia, 2014* (cat no 3303.0, 2016), 'Method of intentional self-harm'.
45 H Klieve, J Sveticic and D De Leo, 'Who uses firearms as a means of suicide?' (2009) 7 *BMC Medicine* 52.

At that rate, the ACT's 7,315 licensees would see less than one such death a year. So suicide by a licensee is rated Possible in any one year, and High (R1). It is the highest-rated harm to a person in this assessment.

The Bill has no measure aimed at self-harm.[46] This assessment found no way for a licensee in crisis to place firearms in safe keeping for a time without risk to their licence.

WHAT SHOULD APPLY. The Act puts public safety first.[47] ISO 31000 advises choosing treatments by weighing their benefits against their costs.[48]

WHY IT MATTERS. The highest-rated harm to a person has no treatment aimed at it. A licensee who fears losing their licence has a reason to hide a health problem and not seek help.

WHY IT HAPPENED. Firearm policy has been driven by the response to mass-casualty attacks. Self-harm is treated as a health matter. It falls between the regulator and health services.

5 FINDING 5 The proposed limit on firearm numbers treats one of the 26 risks directly

IN SHORT

The proposed limit lowers one risk: the loss of many firearms in one theft. It leaves the three High risks as they are, and it adds three new risks.

WHAT WE FOUND. Proposed section 52A limits most licensees to five firearms. A licensee with a listed genuine reason can hold up to ten, or more with the Registrar's approval. The listed reasons include primary production and sport or target shooting. Collector, dealer and composite entity licences are exempt.[49] About 8 per cent of ACT licensees hold more than five firearms.[50]

Of the 26 risks, the limit directly reduces one. That is the loss of a large holding in one theft (R13). No risk of deliberate harm in the register depends on a licensee holding more than five firearms. The licensed Bondi attacker lawfully held six firearms. Published reports say three were used.[51]

The limit applies to each licensee, so a household can keep its firearms by adding licensees. ACT Policing told the Assembly committee that it had seen more applications from partners of current licensees.[52]

WHAT SHOULD APPLY. ISO 31000 lists removing the source of a risk as one treatment option, and advises weighing benefits against costs.[53] Each firearm already needs its own permit to acquire. The Registrar must be satisfied that the applicant has a good reason for that firearm.[54]

WHY IT MATTERS. The limit uses Registry time and public money, and it leaves the three High risks unchanged. It also adds risks. These are more household licences (R25), firearms that leave the registered system (R20) and Registry staff drawn from core work (R3).

WHY IT HAPPENED. The limit came from options that National Cabinet asked ministers to develop the day after the Bondi attack.[55] This assessment found no published risk assessment of the limit for the ACT.

46 Firearms (Public Safety) Amendment Bill 2026 (ACT) cll 4, 12, 14–21.
47 *Firearms Act 1996* (ACT) s 5(1)(a).
48 ISO 31000:2018 cl 6.5.2.
49 Firearms (Public Safety) Amendment Bill 2026 (ACT) cl 4, proposed s 52A.
50 ACT Government, Submission 066 (2026) 10.
51 'The Bondi Attack' (2026) 19(3) *CTC Sentinel*; ABC News, 16 December 2025 (media).
52 Standing Committee on Legal Affairs, Proof Transcript of Evidence, 21 April 2026, 55 (Chief Police Officer S Lee).
53 ISO 31000:2018 cl 6.5.2.
54 *Firearms Act 1996* (ACT) ss 143(2), 145(1)(b).
55 Prime Minister of Australia, 'Meeting of National Cabinet' (media release, 15 December 2025).

6

FINDING 6

The register is a manual, paper-based system

IN SHORT

The firearms register is kept by hand, mostly on paper. That makes it hard to audit, to analyse and to share.

WHAT WE FOUND. ACT Policing told the Assembly committee that the register is "a manual system, which is not ideal". It hoped for a digital system within two years.[56] It also said the paper-based registry put caveats on how far the data can be trusted.[57] The National Firearms Register is due to start by mid-2028.[58]

WHAT SHOULD APPLY. One object of the Act is a joined-up scheme to license and register all firearms.[59] The National Firearms Register will draw on the records of each State and Territory.[60]

WHY IT MATTERS. Errors are hard to find. It is harder to detect diversion by a licensee or dealer (R23), licences gained by deception (R14) and firearms that are not handed in (R20). Police and other responders rely on the register to know what firearms are held at an address (R10).

WHY IT HAPPENED. The register has not been updated as the system has grown. A digital system is planned but is not yet in place.

7

FINDING 7

Storage checks are infrequent, and their results are not published

IN SHORT

Most stolen firearms are taken from homes. Storage checks are not frequent, and no figures on them are published.

WHAT WE FOUND. Theft from homes is the main way lawfully held firearms reach criminals. In 2018, 81 per cent of firearm thefts in Australia were from residential premises. In three States, 17 per cent of stolen firearms were recovered.[61] In the ACT, 28 firearms were reported stolen in 2018, 21 in 2022 and 3 in 2024.[62]

One witness told the Assembly committee that yearly compliance checks were "probably less than desirable". He said his own storage had been checked a couple of times, as a rural licensee with many firearms.[63] That suggests some checks follow the size of a holding. ACT Policing does not publish how many checks it does or what they find.

Storage standards are set by licence category. They step up once, when a licence lists more than ten category A or B firearms.[64]

56 Standing Committee on Legal Affairs, Proof Transcript of Evidence, 21 April 2026, 54 (Superintendent R Breiner, ACT Policing).
57 Standing Committee on Legal Affairs, Proof Transcript of Evidence, 21 April 2026, 64 (Chief Police Officer S Lee).
58 Department of Home Affairs, 'National Firearms Register' (web page, updated 9 October 2026).
59 *Firearms Act 1996* (ACT) s 5(2)(b).
60 Department of Home Affairs, 'National Firearms Register' (web page, updated 9 October 2026).
61 Australian Institute of Criminology, *Firearm theft in Australia 2018* (Statistical Report 24, 2020) 10–11, 17.
62 The Australia Institute, *Firearm theft in Australia* (October 2025) 16–17, 22 (figure 15, table 6), from a freedom of information request to the Australian Federal Police.
63 Standing Committee on Legal Affairs, Proof Transcript of Evidence, 21 April 2026, 21 (Mr S Adams, private witness).
64 *Firearms Regulation 2008* (ACT) s 44A.

WHAT SHOULD APPLY. Part 12 of the Act requires firearms to be stored safely and securely. Police must seize a firearm that they reasonably believe is not stored as required.[65]

WHY IT MATTERS. Stolen firearms enter the illicit market (R6 and R13). Firearms that are not secured can be reached by other people in the home (R5, R11 and R12).

WHY IT HAPPENED. Storage checks compete with other work for Registry and police time. A manual register makes it hard to choose which homes to check first.

8

FINDING 8

The Registry is under strain before the reforms start

IN SHORT

Licence applications have risen since the Bondi attack. The reforms add three new kinds of work. No funding for the ongoing work has been announced.

WHAT WE FOUND. ACT Policing told the Assembly committee that licence applications had risen by about 50 a month since the Bondi attack. The monthly average went from 137 to 188.[66] It said the reforms had "some resource implications for the registry".[67]

The reforms add three kinds of work. These are approvals above the limit, surrender and compensation, and firearm prohibition orders. The Commonwealth will fund 75 per cent of the ACT's buyback costs for compensation and administration.[68] This assessment found no funding announced for the ongoing work.

WHAT SHOULD APPLY. The work that most directly prevents harm is vetting, intelligence and compliance. Good regulation funds that work and protects it.

WHY IT MATTERS. Staff are drawn from core controls to run the reforms (R3). Processing slows. Applications get less scrutiny, and storage checks fall further.

WHY IT HAPPENED. The reforms were built to a timetable set by the law. No review of the Registry's capacity has been published.

9

FINDING 9

Published data are not enough to judge the system

IN SHORT

The ACT does not publish the figures needed to tell if its firearm controls work. That includes deaths, thefts, seizures, inspections and Registry times.

WHAT WE FOUND. This assessment found no regular ACT report on four things. They are firearm deaths and injuries by intent and licence status, licence suspensions and seizures, storage checks, and Registry processing times. The ACT theft figures used here came from a freedom of information request to the

65 *Firearms Act 1996* (ACT) pt 12, ss 180–183.
66 Standing Committee on Legal Affairs, Proof Transcript of Evidence, 21 April 2026, 55 (Superintendent R Breiner, ACT Policing).
67 Standing Committee on Legal Affairs, Proof Transcript of Evidence, 21 April 2026, 57 (Chief Police Officer S Lee).
68 Prime Minister of Australia, 'National partnership delivers ACT firearms buyback and stronger community protections' (media release, 22 August 2026).

Australian Federal Police.[69] ACT Policing told the Assembly committee that the paper-based registry limits how far the data can be trusted.[70]

WHAT SHOULD APPLY. ISO 31000 advises that monitoring and review be a planned part of managing risk.[71] Good policy needs a baseline, so that the effect of a change can be measured.

WHY IT MATTERS. No one can tell if current controls or the 2026 reforms reduce harm. For the same reason, some ratings in this assessment rest on national data.

WHY IT HAPPENED. No law requires the figures to be reported. A manual register makes them hard to produce.

10

FINDING 10

Privately made firearms sit outside the licensing system

IN SHORT

A firearm can now be made at home with a 3D printer. These firearms are not licensed or registered. They still need controlled parts and ammunition, which can be tracked.

WHAT WE FOUND. Firearms can be made with 3D printers and small milling machines. They still need controlled parts, such as barrels. They also need commercial ammunition. The Australian Criminal Intelligence Commission says authorities are "increasingly encountering firearms manufactured outside regulated supply chains".[72]

The Bill proposes an offence of having a digital blueprint for a firearm. It is not yet law in the ACT.[73] A dealer can sell ammunition only to a person whose licence covers that calibre.[74] This assessment found no central check of these sales against licences.

WHAT SHOULD APPLY. The 2026 National Firearms Agreement bans making 3D-printed firearms. It also bans having or sharing material used to make them.[75]

WHY IT MATTERS. This source of supply is growing. Licensing, registration and limits on firearm numbers do not touch it (R2 and R17).

WHY IT HAPPENED. The technology has moved faster than the law. The rules deal mainly with firearms that are already on the register.

69 The Australia Institute, *Firearm theft in Australia* (October 2025) 16–17, 22 (figure 15, table 6), from a freedom of information request to the Australian Federal Police.
70 Standing Committee on Legal Affairs, Proof Transcript of Evidence, 21 April 2026, 64 (Chief Police Officer S Lee).
71 ISO 31000:2018 cl 6.6.
72 Australian Criminal Intelligence Commission, 'Tackling firearms through intelligence' (media statement).
73 Firearms (Public Safety) Amendment Bill 2026 (ACT) cl 12, proposed s 228A.
74 *Firearms Act 1996* (ACT) ss 244, 248.
75 Prime Minister of Australia, 'Meeting of National Cabinet' (media release, 26 August 2026).

Risk treatment

Existing risk treatments

The ACT manages firearm risk through controls set in law. They work in order, from the first application to the disposal of a firearm. Annex D rates each control. The main ones are:

- **Licensing and suitability.** A person who has or uses a firearm must hold a licence. The Registrar must be satisfied that the person is suitable.[76]
- **Genuine reason.** A licence is issued only for a listed purpose, such as sport or target shooting, primary production or vertebrate pest control. Personal protection is not a genuine reason.[77]
- **Permit to acquire.** Each firearm needs its own permit, and the Registrar must be satisfied there is a good reason for it.[78]
- **Registration.** Each firearm is recorded against a licensee, so police know who holds it and where it is kept.[79]
- **Safe storage.** Firearms must be stored to a set standard. Breaches are offences, and police must seize firearms that are not stored as required.[80]
- **Training and supervision.** Applicants complete an approved safety course.[81] Approved clubs supervise shooting and report to the Registrar.[82]
- **Suspension, cancellation and seizure.** A licence is suspended when an interim family violence order is made and cancelled on a final order. Police can seize the firearms.[83] The Registrar can also suspend or cancel a licence when a licensee is no longer suitable.[84]
- **Review and oversight.** The ACT Civil and Administrative Tribunal can review licensing decisions.[85] The Minister answers to the Legislative Assembly.

Together these controls have kept firearm harm in the ACT low. Of the 28 controls assessed, 13 are rated Good, 8 Fair and 3 Poor. Four are passed or proposed and are not yet in force. The three rated Poor are suitability monitoring between renewals, exchange of information with other jurisdictions, and published performance data.

Additional risk treatments

With the treatments below, the three High risks are expected to fall to Medium. Three Medium risks are expected to fall to Low (R23, R24 and R25). The two tables show where each risk sits before and after treatment.

76 *Firearms Act 1996* (ACT) ss 17–19.
77 *Firearms Act 1996* (ACT) ss 61–62 and table 61.
78 *Firearms Act 1996* (ACT) ss 143(2), 145(1)(b).
79 *Firearms Act 1996* (ACT) pt 11, ss 156–167.
80 *Firearms Act 1996* (ACT) pt 12, ss 180–183.
81 *Firearms Act 1996* (ACT) ss 20, 58(2)(c).
82 *Firearms Regulation 2008* (ACT) s 8.
83 *Family Violence Act 2016* (ACT) s 44; *Firearms Act 1996* (ACT) s 80.
84 *Firearms Act 1996* (ACT) ss 79–81, 183.
85 *Firearms Act 1996* (ACT) pt 16 and sch 4.

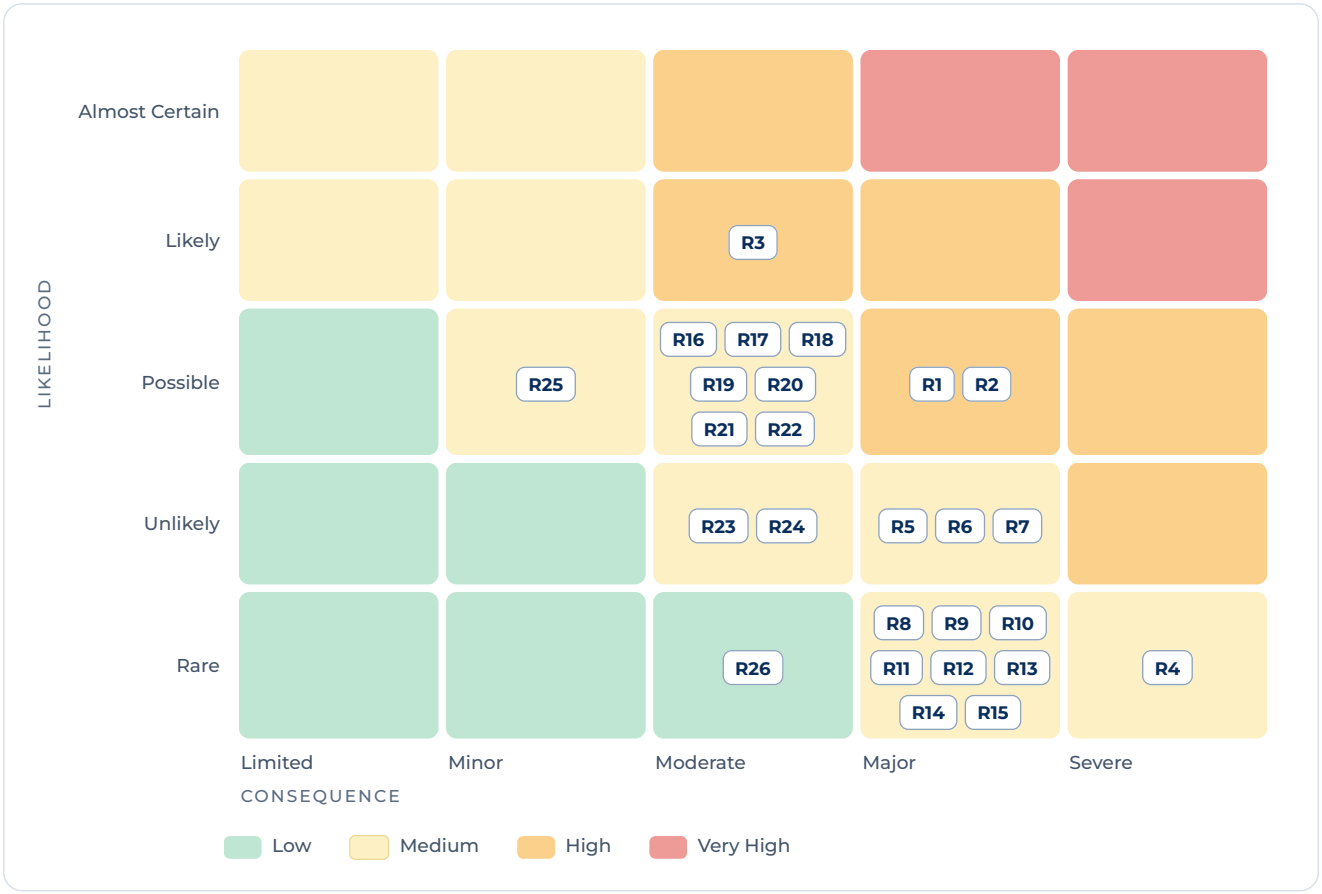


TABLE: Current risk, by risk number

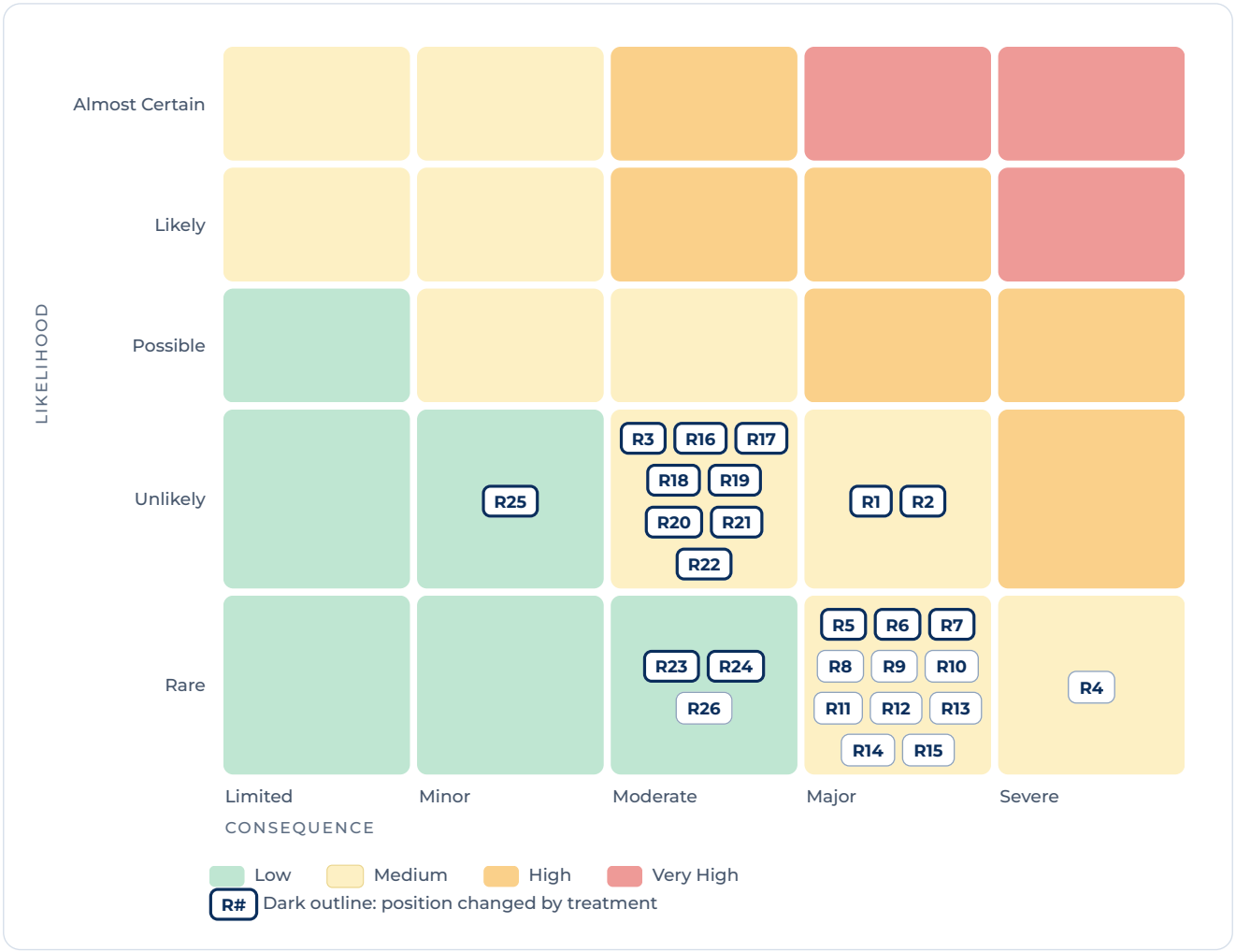


TABLE: Residual risk after the proposed treatments, by risk number

Annex J sets out each treatment in the 4A format. Annex K gives a card for each one, with its owner, actions, measures and a dated test of completion. The 14 treatments are:

T-01	Continuous suitability checking and supportive early intervention
T-02	Intelligence-sharing protocol
T-03	Health and wellbeing pathway with voluntary temporary storage
T-04	Risk-based storage inspection and review of storage standards
T-05	Register digitisation, audit and security
T-06	Registry funding for the reform workload
T-07	Household access assessment and published approval criteria
T-08	Digital blueprint offence and reconciliation of parts and ammunition sales
T-09	Dealer, club and transit security review
T-10	ACT and NSW data exchange and alignment
T-11	Incident reporting and refresher safety training
T-12	Published performance measures and independent review

T-13	Consultative forum and confidential concern line
T-14	Funded partnership with shooting associations and clubs

The treatments share three features. They act on the causes of harm found in the risk register. They build on controls that are already in the Act. Most can be delivered as part of the register upgrade that the National Firearms Register already requires.

T-14 has the widest reach. It helps to treat 15 of the 26 risks, because clubs and associations are where licensees are trained, supervised and known. Funding that work, by open grant, strengthens the control that touches a licensee's life most often.

Suicide by a licensee (R1) falls from High to Medium. It stays the most serious harm to a person. Licensing controls and peer support can reduce access to a firearm in a crisis. They cannot remove the crisis. The ACT Government needs to watch this risk with health and community services as well as the regulator.

Annex D rates the proposed limit on firearm numbers and the buyback as controls not yet in force. If they go ahead, T-06, T-07 and T-12 are needed to manage the risks they bring. A baseline needs to be published before they start, so that their effect on harm can be measured.

In sum, the ACT has a licensing system that works, a licensed population that has been checked, and gaps that can be named. Closing them needs five things. Information must reach the Registry sooner. Storage checks must follow the risk. Licensees in crisis need a safe way to step back. Clubs and associations need resources for the work they already do. And the results need to be published. This assessment needs review at least every three years.

ANNEX A

Background

Setting the scope, context and criteria is the first step of the ISO 31000 process.[86] It ties the assessment to the aims of the system being assessed. It also names the people and factors that bear on risk.

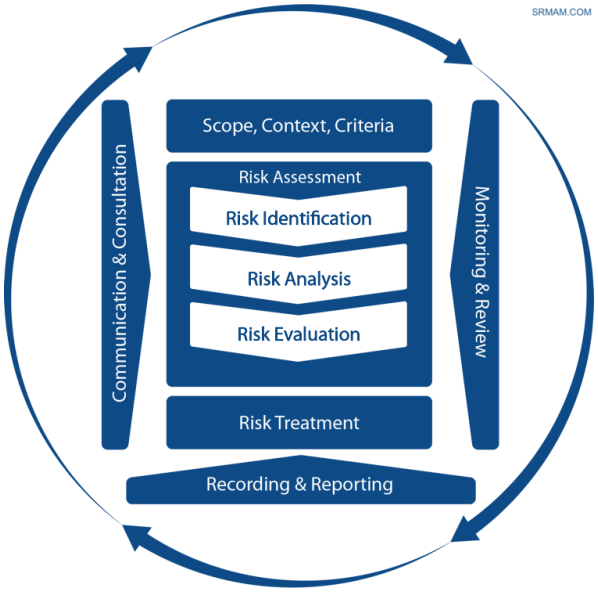


Figure 1: ISO 31000 risk management process

Scope

The assessment covers security and safety risks from the lawful possession, control and use of firearms in the ACT. It covers the ten years from 1 January 2027 to 31 December 2036.

Inclusions

- Firearms held under ACT adult, minors, composite entity, dealer, collector and temporary licences.
- Licensing, permits to acquire, registration, storage, transport and use.
- Suitability checks, suspension, cancellation, seizure and firearm prohibition orders.
- Theft, diversion, illicit manufacture and conversion, where licensed firearms, controlled parts or ammunition are involved.
- Deliberate harm, self-harm, threats and unintentional harm.
- Risks created by changes to the law, including the 2026 reforms.
- The NSW border, the firearms register, online sales of parts and ammunition, and digital blueprints.

Exclusions

- Firearms held by police, the Australian Defence Force and other government agencies.
- Items regulated under the *Prohibited Weapons Act 1996* (ACT).

86 ISO 31000:2018 *Risk management – Guidelines*.

- Manufacture and trafficking overseas, except as a source of supply into the ACT.
- Detailed assessment of other jurisdictions.
- The environmental and noise effects of ranges, and animal welfare in hunting and pest control.

The excluded government and prohibited weapons areas suit a separate assessment.

Objectives of the risk assessment

The aim of the ACT firearms regulatory system is public safety. The Act confirms that having and using a firearm is a privilege, and that it depends on the overriding need to keep the public safe.[87] The assessment has four objectives in support of that aim:

- Find how firearms that are, or were, lawfully held in the ACT can kill, injure or frighten people.
- Rate how well the licensing, registration, storage and enforcement controls stand between those firearms and that harm.
- Rate the risks that the 2026 reforms bring or change, including effects that were not intended.
- Propose treatments in proportion to the level of risk, the cause of the harm and the cost of the control.

The ACT is assessed first because its law is specific and its system is small enough to examine in full. The ACT follows the National Firearms Agreement, so the method and most findings can be applied in other Australian jurisdictions.

Context

Firearm policy in the ACT is being reshaped by the national response to the Bondi Beach attack, while measured firearm harm in the ACT stays low. The external context is set out with the PESTLE framework, the internal context with MORTAR and the risk management context with a SWOT analysis.

External Context

Political. The Bondi Beach terror attack of 14 December 2025 killed 15 people and injured 40.[88] One attacker held a NSW Category A and B firearms licence and lawfully held six firearms.[89] On 15 December 2025, National Cabinet asked ministers to develop options. The options were to speed up the National Firearms Register, use more criminal intelligence in licensing, limit the number and types of firearms, and make citizenship a condition of a licence.[90] First Ministers signed an updated National Firearms Agreement on 26 August 2026. It was the first update since 2017.[91]

Jurisdictions have taken different paths. NSW passed limits in December 2025. They are four firearms for most licensees and ten for listed purposes, such as primary production and sport or target shooting.[92] Western Australia limits hunting licences to five firearms and competition and primary producer licences to ten.[93] Victoria did not accept a recommended cap of four firearms.[94] By August 2026, NSW and the ACT had joined the national buyback.[95]

87 *Firearms Act 1996* (ACT) s 5(1)(a).
88 'The Bondi Attack' (2026) 19(3) *CTC Sentinel*, citing the police statement of facts; SBS News, 30 April 2026 (media).
89 ABC News, 16 December 2025 (media), reporting the NSW Police Commissioner.
90 Prime Minister of Australia, 'Meeting of National Cabinet' (media release, 15 December 2025).
91 Prime Minister of Australia, 'Meeting of National Cabinet' (media release, 26 August 2026).
92 *Terrorism and Other Legislation Amendment Act 2025* (NSW) (Act No 86 of 2025); NSW Police Force, firearms reform guidance.
93 Western Australia Police Force, 'Reform: numerical limits – frequently asked questions'; *Firearms Regulations 2024* (WA) reg 25.
94 Victorian Government, *Rapid Review of Victoria's Firearms Laws: Government Response* (May 2026), recommendation 1.
95 Prime Minister of Australia, 'Meeting of National Cabinet' (media release, 26 August 2026).

The ACT has two reform measures. The Assembly passed the Firearms (Firearm Prohibition Orders) Amendment Act 2026 in October 2026.[96] The Firearms (Public Safety) Amendment Bill 2026 awaits debate.[97] The Standing Committee on Legal Affairs reported on both in May 2026 and made 11 recommendations.[98]

More decisions fall inside the assessment period. The Royal Commission on Antisemitism and Social Cohesion is due to deliver its final report by 18 December 2026. Its interim report recommended finishing the updated National Firearms Agreement and carrying out the buyback.[99] Firearm policy stays contested, and the rules can change more than once in ten years.

Economic. The Commonwealth will fund 75 per cent of the ACT's buyback compensation and administration costs, and all destruction costs.[100] The ACT bears the rest. It also bears the ongoing cost of new approvals, exemptions and prohibition orders. Regulatory resources are limited. Money and staff used on one control are not available for another. So the split between vetting, intelligence, storage compliance and surrender work is itself a source of risk. Licensees, clubs and dealers bear compliance costs. A lasting fall in participation would cut the income and the volunteer base of the clubs that train and supervise licensees.

Social. The ACT had 489,700 residents at 31 March 2026.[101] In December 2025 it had 7,315 licensees, about 1.5 per cent of the population, and 22,857 registered firearms.[102] About 8 per cent of licensees hold more than five firearms.[103]

Suicide made up 77 per cent of firearm deaths in Australia from 1991 to 2001.[104] Firearms are still an uncommon method of suicide. They were used in 6.2 per cent of suicides in 2014.[105] Firearms were used in 23 of 264 homicide incidents in 2024–25, or 9 per cent. That was the lowest number and share since 1989–90.[106] The ACT recorded no homicide incidents in that year.[107]

Two social trends bear on the next ten years. The first is family violence. Domestic homicides were 34 per cent of homicide incidents in 2024–25.[108] Firearms are used in a minority of them. Of 240 women killed by a male partner between 2010 and 2018, 29 were shot, or 12 per cent.[109] A firearm in the home can also be used to threaten without being fired. The second trend is extremism. ASIO reports an increase in extremism,[110] and the national terrorism threat level is PROBABLE.[111]

Technological. Privately made firearms are the main change in technology. 3D printers and small milling machines can make frames and receivers. A working firearm still needs controlled parts, such as a barrel and bolt, and ammunition. The Australian Criminal Intelligence Commission says authorities are "increasingly encountering firearms manufactured outside regulated supply chains".[112] The Bill proposes an offence of possessing a digital blueprint.[113]

Information technology is both a weakness and an opportunity. The ACT register is a manual, paper-based system.[114] The National Firearms Register is due to operate by mid-2028. It is to give police near real-time

96 *Firearms (Firearm Prohibition Orders) Amendment Act 2026* (ACT) (A2026-19) s 2, inserting ss 183F–183ZZQ. Notified 9 November 2026.
97 ACT Legislation Register, Firearms (Public Safety) Amendment Bill 2026, status at 23 November 2026; cl 2 (commencement). ACT Legislative Assembly sitting calendar 2026, sitting week 12.
98 Standing Committee on Legal Affairs, *Inquiry into Legislation on proposed firearms reform* (Report 9, 21 May 2026).
99 Royal Commission on Antisemitism and Social Cohesion, *Interim Report* (30 April 2026); Australian Government response (May 2026), recommendations 13–14.
100 Prime Minister of Australia, 'National partnership delivers ACT firearms buyback and stronger community protections' (media release, 22 August 2026).
101 Australian Bureau of Statistics, *National, state and territory population, March 2026* (17 September 2026).
102 ACT Government, Submission 066 to the Standing Committee on Legal Affairs (2026) 5–6, table 1.
103 ACT Government, Submission 066 (2026) 10.
104 J Mouzos and C Rushforth, *Firearm related deaths in Australia, 1991–2001* (AIC Trends & issues no 269, 2003).
105 Australian Bureau of Statistics, *Causes of Death, Australia, 2014* (cat no 3303.0, 2016), 'Method of intentional self-harm'.
106 Australian Institute of Criminology, *Homicide in Australia 2024–25* (Statistical Report 58, 2026) 12–13, table 10.
107 Australian Institute of Criminology, *Homicide in Australia 2024–25* (Statistical Report 58, 2026) 3–4, table 1.
108 Australian Institute of Criminology, *Homicide in Australia 2024–25* (Statistical Report 58, 2026) 7, table 5.
109 Australian Domestic and Family Violence Death Review Network and ANROWS, *Data Report: Intimate partner violence homicides 2010–2018* (2022) 29–30, table 5.
110 Director-General of Security, opening statement to Senate Estimates (February 2026).
111 Australian National Security, 'Current National Terrorism Threat Level' (web page).

access to firearm, owner and licence information across borders.[115] A digital register also holds data on where firearms are stored in one place. That makes it a target for people who want to steal them.

Legal. The *Firearms Act 1996* (ACT) requires a licence, a genuine reason, a permit for each firearm, registration of every firearm and safe storage.[116] The *Firearms Regulation 2008* (ACT) sets the detail. The ACT Civil and Administrative Tribunal can review the Registrar's decisions.[117]

The Bill would add section 52A. It limits most licensees to five firearms. A licensee with a listed genuine reason can hold ten, or a higher number approved by the Registrar. The listed reasons include primary production, sport or target shooting and vertebrate pest control. Recreational hunting is not listed. Collector, dealer and composite entity licences are exempt.[118] If no start date is set, the changes start on 1 January 2028.[119]

The firearm prohibition order scheme lets the Magistrates Court bar a high-risk person from having firearms for up to three years. Police can search without a warrant where that is reasonably required, and the Chief Police Officer reports to the Ombudsman.[120] ACT Policing made a first estimate that about 70 people could be candidates for an order.[121] The scheme starts on 9 November 2027.[122]

Other laws shape the system. An interim family violence order suspends a licence, and a final order cancels it.[123] The *Human Rights Act 2004* (ACT) requires that a limit on a right be reasonable and justified.[124] The *Australian Capital Territory (Self-Government) Act 1988* (Cth) requires just terms when property is acquired.[125] NSW law applies to licensees and firearms once they cross the border.

Environmental. The ACT is a small jurisdiction enclosed by NSW. People and firearms cross the border without checks, so differences between the two sets of rules matter. The ACT combines a city with rural leases and nature reserves. Firearms are used for primary production and vertebrate pest control.

Most firearm thefts are from homes.[126] At least 115 firearms were reported stolen in the ACT from 2018 to mid-June 2025.[127]

Internal Context

For this assessment, the organisation is the ACT firearms regulatory system. It is made up of the Registrar of Firearms and the Firearms Registry in ACT Policing, the policy arm of the ACT Government, the courts and the tribunal. It also includes the dealers, clubs and licensees who have duties under the Act.

Management systems. The system controls firearms through a set of legal steps. An applicant must be a suitable person, complete approved safety training and show a genuine reason.[128] Each firearm needs its own permit.[129] Every firearm is registered to a licensee and must be stored to a set standard.[130] Licences are renewed at set times. The Registrar can suspend or cancel a licence, and police can seize firearms.[131] These

112 Australian Criminal Intelligence Commission, 'Tackling firearms through intelligence' (media statement).
113 Firearms (Public Safety) Amendment Bill 2026 (ACT) cl 12, proposed s 228A.
115 Department of Home Affairs, 'National Firearms Register' (web page, updated 9 October 2026).
116 *Firearms Act 1996* (ACT) ss 58, 61, 143, 156, 180.
117 *Firearms Act 1996* (ACT) pt 16 and sch 4.
118 Firearms (Public Safety) Amendment Bill 2026 (ACT) cl 4, proposed s 52A.
119 ACT Legislation Register, Firearms (Public Safety) Amendment Bill 2026, status at 23 November 2026; cl 2 (commencement). ACT Legislative Assembly sitting calendar 2026, sitting week 12.
120 *Firearms (Firearm Prohibition Orders) Amendment Act 2026* (ACT) (A2026-19) s 2, inserting ss 183F–183ZZQ. Notified 9 November 2026.
121 ACT Policing, Submission 052.1 (April 2026) 3.
122 *Firearms (Firearm Prohibition Orders) Amendment Act 2026* (ACT) (A2026-19) s 2, inserting ss 183F–183ZZQ. Notified 9 November 2026.
123 *Family Violence Act 2016* (ACT) s 44; *Firearms Act 1996* (ACT) s 80.
124 *Human Rights Act 2004* (ACT) s 28(1), (2)(e).
125 *Australian Capital Territory (Self-Government) Act 1988* (Cth) s 23(1)(a).
126 Australian Institute of Criminology, *Firearm theft in Australia 2018* (Statistical Report 24, 2020) 10–11, 17.
127 The Australia Institute, *Firearm theft in Australia* (October 2025) 16–17, 22 (figure 15, table 6), from a freedom of information request to the Australian Federal Police.
128 *Firearms Act 1996* (ACT) ss 17–19.
129 *Firearms Act 1996* (ACT) ss 143(2), 145(1)(b).
130 *Firearms Act 1996* (ACT) pt 12, ss 180–183.

steps are strongest at entry. Between renewals, the system depends on information reaching the Registry. That can be a family violence order, a criminal charge, a health professional's report, a club report or police intelligence.

Organisation. The Act sets the culture of the system. Possession is a privilege, and public safety comes first.[132] The Registry is a regulatory unit inside a police service, so its work competes with operational policing. Clubs and associations are the practical gateway to the system. They run the safety training that each first-time applicant must complete.[133] SSAA ACT reported 5,446 members in February 2026.[134] The licensed community has a safety culture built on club rules, range discipline and peer supervision. That culture is a control in its own right. It depends on licensees trusting the regulator enough to report concerns, and on volunteers having the capacity to keep it going.

Resources. The Registry administers 7,315 licences and 22,857 registered firearms.[135] Licence applications have risen by about 50 a month since the Bondi attack.[136] The reforms add three kinds of work: approvals above the limit, surrender and compensation, and prohibition orders. The buyback is funded.[137] The ongoing administrative work needs its own resources. SSAA ACT describes its range complex as privately funded and owned.[138] The system's most valuable resource is information: licence histories, intelligence, court orders and health reports.

Technologies. The ACT register is a manual, paper-based system.[139] That limits audit, trend analysis and timely exchange with other jurisdictions. The National Firearms Register is due to supply much of this by mid-2028.[140] Until then, links between the Registry and court, health and intelligence systems depend on people passing information on. Licensees, dealers and clubs own and maintain the safes and alarms that secure firearms.

Accountability. The Minister for Police, Fire and Emergency Services is responsible for the Act.[141] The Chief Police Officer appoints the Registrar, who makes licensing decisions.[142] ACT Policing is delivered by the Australian Federal Police under an agreement with the ACT Government.[143] So the regulator sits in a Commonwealth agency and answers to an ACT Minister. The ACT Civil and Administrative Tribunal can review decisions.[144] Licensees are accountable for storage, for who can reach their firearms, and for reporting loss or theft. Dealers account for stock and sales. Clubs account for their members' participation and conduct.

Relationships. The main stakeholders are listed in Annex G. The system's most important dependency is the flow of intelligence and court information into the Registry. The second is how well ACT and NSW rules line up across an open border.

Risk Management Context

The ACT system is strong at controlling entry to firearm ownership. It is weaker at seeing a change in a licensee's life afterwards.

131 *Firearms Act 1996* (ACT) ss 79–81, 183.
132 *Firearms Act 1996* (ACT) s 5(1)(a).
133 ACT Policing, 'Firearms licences' (web page); *Firearms Act 1996* (ACT) ss 20, 58(2)(c).
134 Sporting Shooters' Association of Australia (ACT) Inc, Submission 069 to the Standing Committee on Legal Affairs (2026) 11.
135 ACT Government, Submission 066 to the Standing Committee on Legal Affairs (2026) 5–6, table 1.
136 Standing Committee on Legal Affairs, Proof Transcript of Evidence, 21 April 2026, 55 (Superintendent R Breiner, ACT Policing).
137 Prime Minister of Australia, 'National partnership delivers ACT firearms buyback and stronger community protections' (media release, 22 August 2026).
138 Sporting Shooters' Association of Australia (ACT) Inc, Submission 069 to the Standing Committee on Legal Affairs (2026) 11.
139 Standing Committee on Legal Affairs, Proof Transcript of Evidence, 21 April 2026, 54 (Superintendent R Breiner, ACT Policing).
140 Department of Home Affairs, 'National Firearms Register' (web page, updated 9 October 2026).
141 Administrative Arrangements 2026 (No 2) (ACT) NI2026-407.
142 *Firearms Act 1996* (ACT) s 33.
143 ACT Government, ACT Policing Arrangement and Purchase Agreement.
144 *Firearms Act 1996* (ACT) pt 16 and sch 4.

Strengths

- A mature legal framework: licensing, genuine reason, a permit for each firearm, registration and set storage standards.
- A screened licensed population. Each licensee passed a suitability check when the Registrar last decided on their licence. The check bars a person found guilty of a prescribed offence, or placed under a final protection order, in the previous ten years.[145]
- A separate check of every extra firearm through the permit to acquire.
- A small system. With 7,315 licensees and 22,857 firearms, each can be known, inspected and audited.
- A low measured level of harm, with few thefts and no homicide incidents in 2024–25.[146]
- A safety culture in clubs and among licensees, with supervision and peer oversight.
- A legal link between family violence orders and licence suspension or cancellation.[147]
- Independent review of decisions through the tribunal.

Weaknesses

- A manual, paper-based register, which limits audit, analysis and exchange of information.
- Dependence on other agencies to pass intelligence, court and health information to the Registry.
- Limited capacity for storage checks and for review of suitability between renewals.
- Suitability is checked at fixed points, while risk in a licensee's life changes all the time.
- No control at the NSW border, and different rules on each side.
- Little published data on Registry workload, compliance results and firearm harm in the ACT.
- Regulation sits inside a police service, where it competes with operational work.
- Reliance on clubs and associations for training, supervision and early warning, without resources for that role.

Opportunities

- The National Firearms Register, with near real-time access across borders from mid-2028.
- Use of criminal and security intelligence in licensing under the updated National Firearms Agreement.
- Firearm prohibition orders, which target the small number of high-risk people directly.
- Commonwealth funding for the buyback.
- Continuous suitability checks in place of checks only at renewal.
- Clearer ways for health practitioners, clubs, families and licensees to report a concern.
- Published performance measures and an independent review, so that controls can be judged on results.
- A funded partnership with clubs and associations on training, member support, storage and early reporting of concerns.

Threats

- Violent extremists who hold, or can reach, lawfully held firearms.
- Family violence offenders who can reach a firearm in the home.
- A licensee's mental health crisis or cognitive decline that is not reported.

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145 *Firearms Act 1996* (ACT) ss 17(2)(b), 19(1)(b). Section 19 excepts a protection order that was revoked, overturned on appeal or that permits firearms. A court that makes a personal protection order can order that a licence is not suspended or cancelled, and the Registrar must then reassess suitability: *Personal Violence Act 2016* (ACT) ss 36(3), 37(3); *Firearms Act 1996* (ACT) s 81A.
146 Australian Institute of Criminology, *Homicide in Australia 2024–25* (Statistical Report 58, 2026) 3–4, table 1.
147 *Family Violence Act 2016* (ACT) s 44; *Firearms Act 1996* (ACT) s 80.

- Burglars and organised crime groups who target firearms in homes, dealers and clubs.
- Privately made and converted firearms, which bypass licensing and registration.
- Deception in licence and permit applications, including proxy applicants for prohibited people.
- Compromise of register data that shows where firearms are stored.
- Reform measures that add work or change behaviour without reducing harm, and so draw resources from controls that do.

Risk Tolerance Criteria

Risks were rated against the criteria in Annex F. The criteria are those of the SRMBOK security risk management framework. They were applied as follows.

- **Timeframe.** The assessment covers the ten years from 2027 to 2036. Likelihood is the chance that the event happens in the ACT in any one year of that period. The probability column of the likelihood table governs. The historical column is a guide only.
- **Consequence.** Consequence is rated on harm to people. The loss of one or two lives, or life-threatening injury to several people, is Major. The loss of three or more lives is Severe. Psychological harm from threats is rated as significant harm to a person. Each risk is rated at the consequence in its risk statement. Its likelihood is the chance of that consequence, not of an earlier event such as a theft.
- **Threat tolerance.** The harm of concern is loss of life. So threat acts rated Low and above are carried into the risk register.
- **Risk tolerance.** Risks rated Medium and above need treatment or recorded monitoring. Risks rated Low are managed by current controls.
- **Evidence.** ACT incident numbers are small. Where ACT data are not published, likelihood draws on national rates applied to the ACT's licensees. Ratings follow the evidence. No rating is precautionary.
- **Sensitivity.** Where a rating sits close to a boundary, the Risk Assessment section says how it would change.

The assessment needs review after three years, or sooner after a serious incident or a change in the law.

ANNEX B

Asset criticality assessment

The assets below fall within the scope of the assessment. In an assessment that protects the community, the main assets are people. Each asset was given a category and a criticality rating to guide the risk work.

ASSET	CATEGORY	CRITICALITY
Community members	People	VITAL
Family and household members of licensees	People	VITAL
Licensees and authorised users	People	VITAL
Police and emergency responders	People	VITAL
Public confidence in firearms regulation	Reputation	KEY
Licensed firearms, controlled parts and ammunition	Property	KEY
Register and licensing information	Information	KEY
Intelligence and suitability information	Information	KEY
Regulatory capability	Capability	KEY
Clubs, ranges and dealers	Capability	KEY
Lawful firearm use	Capability	IMPORTANT
Public funds	Economic assets	IMPORTANT

TABLE: Asset criticality assessment

Community members

The safety of people in the ACT is the reason the licensing system exists. The Act makes public safety the overriding consideration.[148] Death or serious injury to a member of the public is the harm the system is built to prevent. It cannot be undone. The community is exposed in two ways. The first is direct harm from a firearm that is, or was, lawfully held. The second is the wider harm that follows a serious incident: fear, and loss of trust in public places and in government.

Family and household members of licensees

The people most exposed to a lawfully held firearm are those who live with it. They include partners, children, parents, other residents and regular visitors. They are also the people best placed to notice a change in a licensee's health, conduct or circumstances. So they are both an asset to protect and a source of early warning.

148 *Firearms Act 1996* (ACT) s 5(1)(a).

Licensees and authorised users

The ACT had 7,315 licensees in December 2025.[149] Licensees are the people most likely to be harmed by their own firearm, through self-harm or unintentional discharge. They are also the main control. A licensee decides how firearms are stored, who can reach them and whether a concern is reported. A system that loses the trust of the people it regulates loses its main source of compliance and information.

Police and emergency responders

Police, paramedics and other responders attend homes where firearms are held. They often do so in a crisis and with incomplete information. They rely on the register to know if firearms are present. Their safety depends on how accurate that record is, and on how fast firearms are removed from a person who has become a risk.

Public confidence in firearms regulation

Lawful firearm ownership depends on community acceptance. Confidence in the system lets sport, primary production and pest control continue. It also gives the regulator standing to make hard decisions. A serious incident involving a licensee damages that confidence for every licensee, and it has led to rapid changes in the law.

Clubs, ranges and dealers

Clubs and associations run the safety training needed for a licence and supervise shooting.[150] They are where most licensees are known to their peers. A sport or target shooting licence depends on membership of an approved club.[151] A decline in club capacity would restrict lawful shooting and remove the system's main point of regular contact with licensees. Dealers control the lawful supply of firearms, parts and ammunition.

Register and licensing information

The register records who holds firearms, what they hold and where it is stored. Every compliance and enforcement decision rests on it, and so does the safety of responders. The same information would be valuable to a criminal who wants firearms. Its accuracy, availability and confidentiality all matter.

149 ACT Government, Submission 066 to the Standing Committee on Legal Affairs (2026) 5–6, table 1.
150 ACT Policing, 'Firearms licences' (web page); *Firearms Act 1996* (ACT) ss 20, 58(2)(c).
151 *Firearms Act 1996* (ACT) table 61, item 1.

ANNEX C

Threat / hazard assessment

The sources of risk below were assessed to support the risk work. A threat is a deliberate act. It is rated by the intent and capability of the actor, which are shown under the rating. A hazard is a source of harm that is not a deliberate act against another person. It includes self-directed harm, failures of the regulatory system and the effects of changes to the law. A hazard is rated by the nature of the event.

TYPE	ACTOR OR HAZARD	ACT OR EVENT	MAIN ASSETS AT RISK	RATING
Threat	**Violent extremists**	Mass-casualty attack with lawfully held firearms	Community members; Police and emergency responders; Public confidence in firearms regulation	HIGH Committed and Moderate
		Armed attack on police or responders	Police and emergency responders; Community members	MEDIUM Expressed and Moderate
Threat	**Family violence offenders**	Homicide or serious injury of a partner or family member	Family and household members of licensees; Public confidence in firearms regulation	MEDIUM Expressed and Moderate
		Threat or coercion with a firearm	Family and household members of licensees; Community members	HIGH Committed and Moderate
Threat	**Licensees in a personal dispute**	Shooting of a neighbour, associate or co-worker	Community members	LOW Implied and Moderate
Threat	**Unlicensed household members and visitors**	Use of a licensee's firearm against another person	Family and household members of licensees; Community members	LOW Expressed and Emerging
Threat	**Burglars and opportunistic criminals**	Theft of firearms from residential storage	Licensed firearms, controlled parts and ammunition; Community members	MEDIUM Expressed and Moderate
		Theft of a large holding from one address	Licensed firearms, controlled parts and ammunition; Community members	MEDIUM Expressed and Moderate
Threat	**Serious and organised criminals**	Targeted theft from a dealer, club or in transit	Licensed firearms, controlled parts and ammunition; Clubs, ranges and dealers; Community members	HIGH Committed and Developed
		Illicit manufacture, conversion or import of firearms	Community members; Police and emergency responders	HIGH Committed and Moderate

TYPE	ACTOR OR HAZARD	ACT OR EVENT	MAIN ASSETS AT RISK	RATING
		Movement of firearms or people across the NSW border	Community members; Licensed firearms, controlled parts and ammunition	MEDIUM Expressed and Moderate
Threat	**Corrupt or negligent licensees and dealers**	Diversion of firearms to unlicensed people	Licensed firearms, controlled parts and ammunition; Community members; Public confidence in firearms regulation	MEDIUM Implied and Developed
Threat	**Deceptive applicants**	Licence or permit obtained by deception or as a proxy	Intelligence and suitability information; Community members	MEDIUM Expressed and Moderate
Threat	**Unlicensed people seeking supply**	Acquisition of ammunition or controlled parts	Licensed firearms, controlled parts and ammunition; Community members	LOW Expressed and Emerging
Threat	**Cyber criminals and malicious insiders**	Compromise of register data showing storage locations	Register and licensing information; Licensed firearms, controlled parts and ammunition	MEDIUM Expressed and Moderate
Hazard	**Self-directed harm**	Suicide by a licensee with their own firearm	Licensees and authorised users; Family and household members of licensees	CRITICAL
		Suicide by a household member with a licensee's firearm	Family and household members of licensees	EMERGING
Hazard	**Human factors**	Child reaches an unsecured firearm	Family and household members of licensees	EMERGING
		Unintentional discharge in handling, storage or transport	Licensees and authorised users; Family and household members of licensees	EMERGING
		Range incident	Licensees and authorised users; Clubs, ranges and dealers; Community members	BENIGN
		Hunting or pest control incident	Licensees and authorised users; Community members	EMERGING
		Incident involving a minor or supervised novice	Licensees and authorised users; Clubs, ranges and dealers	BENIGN
Hazard	**Information and system failure**	Unsuitable applicant not identified at issue or renewal	Intelligence and suitability information; Community members	EMERGING
		Person who has become unsuitable keeps possession	Community members; Family and household members of licensees; Licensees and authorised users	EMERGING

TYPE	ACTOR OR HAZARD	ACT OR EVENT	MAIN ASSETS AT RISK	RATING
		Delayed suspension, cancellation or seizure	Family and household members of licensees; Police and emergency responders	EMERGING
		Inaccurate register data	Register and licensing information; Police and emergency responders	CRITICAL
Hazard	**Regulatory change**	Additional household licences to retain firearms	Family and household members of licensees; Licensees and authorised users	EMERGING
		Firearms above the limit leave the registered system	Licensed firearms, controlled parts and ammunition; Register and licensing information	EMERGING
		Registry capacity drawn from core controls	Regulatory capability; Community members	CRITICAL
		Reduced trust and reporting of concerns	Intelligence and suitability information; Public confidence in firearms regulation	EMERGING
		Erosion of club and association capacity	Clubs, ranges and dealers; Lawful firearm use	EMERGING

TABLE: Threat and hazard assessment

ANNEX D

Controls assessment

This annex rates how well each current control works. The ratings rest on public information and will be tested with the Registrar of Firearms and ACT Policing. A control that is passed or proposed but not yet working is marked as not yet in force and is not rated.

CONTROL	COMMENT	RATING
Legislation and governance		
Firearms Act 1996 and Firearms Regulation 2008	The Act sets up licensing, genuine reason, permits to acquire, registration and storage. Public safety is its overriding principle.[152] The framework is mature and is amended often. It controls entry to ownership more strongly than it tracks change after a licence is issued.	GOOD
National Firearms Agreement	First Ministers signed an updated agreement on 26 August 2026. It covers shared criminal intelligence, citizenship as a licence condition, and a ban on making 3D-printed firearms.[153] Its effect depends on each jurisdiction putting it into law.	GOOD
Oversight and review of decisions	The Minister answers to the Assembly. The ACT Civil and Administrative Tribunal can review licensing decisions.[154] Review processes are set up and in use.	GOOD
Performance reporting and published data	This assessment found little published data on Registry workload, inspections, suspensions, thefts or firearm harm in the ACT. The theft figures used here came from a freedom of information request.[155] Without published measures, neither the regulator nor the community can judge if the controls work.	POOR
Licensing and suitability		
Suitability assessment at application	The Registrar must be satisfied that an applicant is a suitable person. Some matters bar a licence, and others must be weighed.[156] The test is sound. It is only as good as the information the Registry has at the time.	GOOD
Criminal and security intelligence in licensing decisions	The Act lets the Registrar use and protect sensitive information in licensing decisions.[157] The updated National Firearms Agreement commits the Commonwealth to share criminal intelligence.[158] This assessment found no published standard for how fast or how fully intelligence reaches the Registry.	FAIR
Genuine reason requirement	Each licensee must show a genuine reason, such as club membership or permission to shoot on rural land. Personal protection is not a genuine reason.[159] The rule is well settled and limits ownership to people with a real purpose.	GOOD

152 *Firearms Act 1996* (ACT) s 5(1)(a).
153 Prime Minister of Australia, 'Meeting of National Cabinet' (media release, 26 August 2026).
154 *Firearms Act 1996* (ACT) pt 16 and sch 4.
155 The Australia Institute, *Firearm theft in Australia* (October 2025) 16–17, 22 (figure 15, table 6), from a freedom of information request to the Australian Federal Police.
156 *Firearms Act 1996* (ACT) ss 17(2)(b), 19(1)(b). Section 19 excepts a protection order that was revoked, overturned on appeal or that permits firearms. A court that makes a personal protection order can order that a licence is not suspended or cancelled, and the Registrar must then reassess suitability: *Personal Violence Act 2016* (ACT) ss 36(3), 37(3); *Firearms Act 1996* (ACT) s 81A.
157 *Firearms Act 1996* (ACT) ss 18(1)(c), 18A–18C.
158 Prime Minister of Australia, 'Meeting of National Cabinet' (media release, 26 August 2026).
159 *Firearms Act 1996* (ACT) ss 61–62 and table 61.

CONTROL	COMMENT	RATING
Firearms safety training	Applicants must complete an approved firearms training and safety course before a licence is issued.[160] Clubs and authorised instructors run it.[161] There is no rule for refresher training during the life of a licence.	GOOD
Permit to acquire	Each firearm needs its own permit. The Registrar must be satisfied that the applicant has a good reason for that firearm.[162] This is a separate check of each purchase. It is the current control on how many firearms a person builds up.	GOOD
Periodic licence renewal	Licences expire and must be renewed. Renewal is a set chance to test suitability and genuine reason again. It is a check at fixed times. It cannot see a change that happens the day after a licence is renewed.	FAIR
Suitability monitoring between renewals	Between renewals, the Registry depends on being told of a relevant event. The register is a manual system,[163] so licensees cannot be matched each day against police, court and intelligence records. This is the largest gap in the control framework.	POOR
Health professional disclosure	Section 261 lets a health professional tell the Registrar of a belief that a patient with access to a firearm is a threat to themselves or to public safety. It protects a professional who acts honestly.[164] Disclosure is voluntary. This assessment found no published count of disclosures.	FAIR
Family violence suspension and cancellation	A licence is suspended when a family violence order is made, and cancelled on a final order.[165] The control acts on a known cause of harm. It works only if the Registry is told promptly and every firearm the person can reach is found, including firearms held by others in the home.	GOOD
Suspension, cancellation and seizure powers	The Registrar can suspend or cancel a licence, and police can seize firearms.[166] The powers are adequate. This assessment found no published data on how often they are used, or how fast firearms are removed.	GOOD
Firearm prohibition orders	The Assembly passed the scheme in October 2026. It starts on 9 November 2027.[167] A court can bar a high-risk person from having firearms. ACT Policing estimates about 70 people could be candidates.[168] It targets the people who pose the greatest risk. It is not yet in force.	NOT YET IN FORCE
Registration and information		
Firearms register	Each firearm is registered to a licensee.[169] The ACT register is a manual, paper-based system.[170] That limits audit, data extraction, trend analysis and reconciliation. The register meets its legal purpose. It does not support modern assurance.	FAIR
Interstate information exchange	The ACT has no shared register with other jurisdictions. The National Firearms Register is due by mid-2028 and is to close this gap.[171] Until then, a person or firearm that crosses the NSW border is only partly visible.	POOR

160 *Firearms Act 1996* (ACT) ss 20, 58(2)(c).
161 ACT Policing, 'Firearms licences' (web page); *Firearms Act 1996* (ACT) ss 20, 58(2)(c).
162 *Firearms Act 1996* (ACT) ss 143(2), 145(1)(b).
163 Standing Committee on Legal Affairs, Proof Transcript of Evidence, 21 April 2026, 54 (Superintendent R Breiner, ACT Policing).
164 *Firearms Act 1996* (ACT) s 261.
165 *Family Violence Act 2016* (ACT) s 44; *Firearms Act 1996* (ACT) s 80.
166 *Firearms Act 1996* (ACT) ss 79–81, 183.
167 *Firearms (Firearm Prohibition Orders) Amendment Act 2026* (ACT) (A2026-19) s 2, inserting ss 183F–183ZZQ. Notified 9 November 2026.
168 ACT Policing, Submission 052.1 (April 2026) 3.
169 *Firearms Act 1996* (ACT) pt 11, ss 156–167.
170 Standing Committee on Legal Affairs, Proof Transcript of Evidence, 21 April 2026, 54 (Superintendent R Breiner, ACT Policing).
171 Department of Home Affairs, 'National Firearms Register' (web page, updated 9 October 2026).

CONTROL	COMMENT	RATING
Register information security	Register information is held in ACT Policing systems and on paper. A paper register is hard to attack from a distance and easy to lose or misuse from the inside. Moving to a national digital register changes that exposure. It needs a security assessment before it goes live.	FAIR
Physical security and storage		
Safe storage requirements	Part 12 of the Act sets storage duties, with offences for breaches.[172] The standards are set by licence category. They step up once, when a licence lists more than ten category A or B firearms.[173]	GOOD
Storage inspection and compliance	Police must seize a firearm that they reasonably believe is not stored as required.[174] One witness told the Assembly committee that yearly checks were "probably less than desirable".[175] ACT Policing does not publish how many checks it does or what they find.	FAIR
Dealer, club and transport security	Dealers and clubs must meet security, record-keeping and reporting duties, and firearms must be carried safely. These premises hold the largest numbers of firearms in the ACT. This assessment found no published security review of them.	GOOD
Use and supply		
Approved clubs, ranges and supervision	Sport and target shooters must belong to an approved club.[176] Clubs enforce range rules, supervise new shooters and report to the Registrar.[177] Range officers and peers watch conduct in a way no other control does. The work rests on volunteers and is not resourced.	GOOD
Ammunition and controlled parts	A dealer can sell ammunition only to a person whose licence or permit covers that calibre.[178] Barrels, receivers and other major parts are regulated as firearm parts. This assessment found no central check of ammunition and parts sales against licences.	GOOD
Illicit firearms and enforcement		
Illicit firearms enforcement and amnesty	ACT Policing investigates firearm offences with national agencies. The permanent national firearms amnesty lets people hand in unregistered firearms without penalty. The size of the illicit market is not known with confidence.	FAIR
Digital blueprint offence	The Bill proposes an offence of possessing a digital blueprint for a firearm.[179] It is not yet law in the ACT.	NOT YET IN FORCE
ACT and NSW coordination	ACT and NSW police work together. The two sets of rules differ in limits and categories. There is no shared register until the National Firearms Register operates.[180]	FAIR
2026 reform measures		

172 *Firearms Act 1996* (ACT) pt 12, ss 180–183.
173 *Firearms Regulation 2008* (ACT) s 44A.
174 *Firearms Act 1996* (ACT) pt 12, ss 180–183.
175 Standing Committee on Legal Affairs, Proof Transcript of Evidence, 21 April 2026, 21 (Mr S Adams, private witness).
176 *Firearms Act 1996* (ACT) table 61, item 1.
177 *Firearms Regulation 2008* (ACT) s 8.
178 *Firearms Act 1996* (ACT) ss 244, 248.
179 Firearms (Public Safety) Amendment Bill 2026 (ACT) cl 12, proposed s 228A.
180 Department of Home Affairs, 'National Firearms Register' (web page, updated 9 October 2026).

CONTROL	COMMENT	RATING
Numerical limits on firearms	Proposed section 52A would limit most licensees to five firearms, or ten or more for listed genuine reasons.[181] The limit cuts the number of firearms that can be lost in one theft from one licensee. It does not test suitability, limit who in a home can reach a firearm or improve storage. It applies to each licensee, so a household can keep its firearms by adding licensees.	NOT YET IN FORCE
National firearms buyback	The Commonwealth will fund 75 per cent of ACT compensation and administration costs and all destruction costs.[182] The buyback removes firearms that become unlawful to hold under the reforms. It cuts the total number of registered firearms. It does not select firearms by the risk their holder poses.	NOT YET IN FORCE

TABLE: Controls assessment

181 Firearms (Public Safety) Amendment Bill 2026 (ACT) cl 4, proposed s 52A.
182 Prime Minister of Australia, 'National partnership delivers ACT firearms buyback and stronger community protections' (media release, 22 August 2026).

ANNEX E

Risk register

Risks are numbered R1 to R26 in order of current rating. The number is a serial identifier only. Each risk statement uses the CASE format. It names the consequence, the asset at risk, the source and the event. A risk can have several treatments, and a treatment can address several risks. Likelihood is the chance that the event happens in the ACT, with the consequence described, in any one year.

R1 Suicide by a licensee with their own firearm

CURRENT RISK: HIGH Possible · Major → RESIDUAL RISK: MEDIUM Unlikely · Major

RISK STATEMENT

A licensee dies by suicide with their own firearm, and their family suffers lasting harm. It happens in a mental health crisis or a time of acute stress that is not seen, reported or acted on while the firearm stays in the home.

SOURCE

Hazard: **Self-directed harm.** Suicide by a licensee with their own firearm (Critical)

MAIN ASSETS

Licensees and authorised users (VITAL); Family and household members of licensees (VITAL).

CURRENT CONTROLS

Periodic licence renewal; Suitability monitoring between renewals; Health professional disclosure; Suspension, cancellation and seizure powers; Approved clubs, ranges and supervision.

TREATMENTS

- T-03 Health and wellbeing pathway with voluntary temporary storage
- T-14 Funded partnership with shooting associations and clubs
- T-01 Continuous suitability checking and supportive early intervention
- T-13 Consultative forum and confidential concern line

R2 Illicit manufacture, conversion or import of firearms

CURRENT RISK: HIGH Possible · Major → RESIDUAL RISK: MEDIUM Unlikely · Major

RISK STATEMENT

A member of the community or a police officer is killed or seriously injured with a firearm from outside the licensing system. Criminals make, convert or import these firearms. They include 3D-printed firearms finished with controlled parts and commercial ammunition.

SOURCE

Threat: **Serious and organised criminals.** Illicit manufacture, conversion or import of firearms (High)

MAIN ASSETS

Community members (VITAL); Police and emergency responders (VITAL).

CURRENT CONTROLS

National Firearms Agreement; Ammunition and controlled parts; Illicit firearms enforcement and amnesty; Digital blueprint offence; Firearm prohibition orders.

TREATMENTS

- T-08 Digital blueprint offence and reconciliation of parts and ammunition sales
- T-10 ACT and NSW data exchange and alignment

R3 Registry capacity drawn from core controls

CURRENT RISK: HIGH Likely · Moderate → RESIDUAL RISK: MEDIUM Unlikely · Moderate

RISK STATEMENT

The community is less protected because core controls weaken. Registry staff are moved from vetting, intelligence and storage compliance to run limits, approvals and surrenders.

SOURCE

Hazard: **Regulatory change.** Registry capacity drawn from core controls (Critical)

MAIN ASSETS

Regulatory capability (KEY); Community members (VITAL).

CURRENT CONTROLS

Performance reporting and published data; Suitability monitoring between renewals; Storage inspection and compliance.

TREATMENTS

- T-06 Registry funding for the reform workload
- T-14 Funded partnership with shooting associations and clubs
- T-12 Published performance measures and independent review

R4 Mass-casualty attack by a licensee or authorised user

CURRENT RISK: MEDIUM Rare · Severe → RESIDUAL RISK: MEDIUM Rare · Severe

RISK STATEMENT

Several people are killed or seriously injured, and public confidence is lost for a long time. A licensee or authorised user with extremist motives attacks a public place with registered firearms. Signs of radicalisation were not shared with the Registry.

SOURCE

Threat: **Violent extremists.** Mass-casualty attack with lawfully held firearms (High)

MAIN ASSETS

Community members (VITAL); Police and emergency responders (VITAL); Public confidence in firearms regulation (KEY).

CURRENT CONTROLS

Suitability assessment at application; Criminal and security intelligence in licensing decisions; Periodic licence renewal; Suitability monitoring between renewals; Suspension, cancellation and seizure powers; Firearm prohibition orders; Interstate information exchange.

TREATMENTS

- T-01 Continuous suitability checking and supportive early intervention
- T-02 Intelligence-sharing protocol
- T-14 Funded partnership with shooting associations and clubs
- T-13 Consultative forum and confidential concern line

R5 Suicide by a household member with a licensee's firearm

CURRENT RISK: MEDIUM Unlikely · Major → RESIDUAL RISK: MEDIUM Rare · Major

RISK STATEMENT

A household member, who could be a young person, dies by suicide with a licensee's firearm. They could reach it because the storage, keys or combination were not secured against other residents.

SOURCE

Hazard: **Self-directed harm.** Suicide by a household member with a licensee's firearm (Emerging)

MAIN ASSETS

Family and household members of licensees (VITAL).

CURRENT CONTROLS

Safe storage requirements; Storage inspection and compliance; Health professional disclosure.

TREATMENTS

- T-04 Risk-based storage inspection and review of storage standards
- T-03 Health and wellbeing pathway with voluntary temporary storage
- T-14 Funded partnership with shooting associations and clubs
- T-07 Household access assessment and published approval criteria

R6 Residential firearm theft and later criminal use

CURRENT RISK: MEDIUM Unlikely · Major → RESIDUAL RISK: MEDIUM Rare · Major

RISK STATEMENT

A member of the community is killed or seriously injured, and the pool of illicit firearms grows. A burglar steals firearms from home storage that does not resist a determined attack, and the firearms are later used in crime.

SOURCE

Threat: **Burglars and opportunistic criminals.** Theft of firearms from residential storage (Medium)

MAIN ASSETS

Licensed firearms, controlled parts and ammunition (KEY); Community members (VITAL).

CURRENT CONTROLS

Firearms register; Safe storage requirements; Storage inspection and compliance; Illicit firearms enforcement and amnesty.

TREATMENTS

- T-04 Risk-based storage inspection and review of storage standards
- T-14 Funded partnership with shooting associations and clubs
- T-05 Register digitisation, audit and security

R7 Theft from a dealer, club or in transit

CURRENT RISK: MEDIUM Unlikely · Major → RESIDUAL RISK: MEDIUM Rare · Major

RISK STATEMENT

Members of the community are killed or seriously injured. Organised criminals steal several firearms from a dealer, club, security business or vehicle in transit and supply them to the illicit market.

SOURCE

Threat: **Serious and organised criminals.** Targeted theft from a dealer, club or in transit (High)

MAIN ASSETS

Licensed firearms, controlled parts and ammunition (KEY); Clubs, ranges and dealers (KEY); Community members (VITAL).

CURRENT CONTROLS

Dealer, club and transport security; Firearms register; Illicit firearms enforcement and amnesty.

TREATMENTS

- T-09 Dealer, club and transit security review
- T-05 Register digitisation, audit and security

R8 Family violence homicide or injury by a licensee

CURRENT RISK: MEDIUM Rare · Major → RESIDUAL RISK: MEDIUM Rare · Major

RISK STATEMENT

A partner or family member is killed or seriously injured. A licensee uses a lawfully held firearm in family violence. A pattern of worsening behaviour was not reported or acted on before the firearm was removed.

SOURCE

Threat: **Family violence offenders.** Homicide or serious injury of a partner or family member (Medium)

MAIN ASSETS

Family and household members of licensees (VITAL); Public confidence in firearms regulation (KEY).

CURRENT CONTROLS

Suitability assessment at application; Suitability monitoring between renewals; Family violence suspension and cancellation; Suspension, cancellation and seizure powers; Safe storage requirements.

TREATMENTS

- T-01 Continuous suitability checking and supportive early intervention
- T-14 Funded partnership with shooting associations and clubs

R9 Shooting by a licensee in a non-domestic dispute

CURRENT RISK: MEDIUM Rare · Major → RESIDUAL RISK: MEDIUM Rare · Major

RISK STATEMENT

A member of the community is killed or seriously injured. A licensee uses a lawfully held firearm in a dispute with a neighbour, associate or co-worker. Their conduct or health had declined between licence renewals.

SOURCE

Threat: **Licensees in a personal dispute.** Shooting of a neighbour, associate or co-worker (Low)

MAIN ASSETS

Community members (VITAL).

CURRENT CONTROLS

Suitability assessment at application; Periodic licence renewal; Suitability monitoring between renewals; Suspension, cancellation and seizure powers.

TREATMENTS

- T-01 Continuous suitability checking and supportive early intervention
- T-14 Funded partnership with shooting associations and clubs
- T-13 Consultative forum and confidential concern line

R10 Shooting of police or responders by a licensee

CURRENT RISK: MEDIUM Rare · Major → RESIDUAL RISK: MEDIUM Rare · Major

RISK STATEMENT

A police officer or other responder is killed or seriously injured. A licensee fires on officers who attend the home for a welfare check, to serve an order or to seize firearms. The register or intelligence did not warn of the firearms or of the person's hostility.

SOURCE

Threat: **Violent extremists.** Armed attack on police or responders (Medium)

MAIN ASSETS

Police and emergency responders (VITAL); Community members (VITAL).

CURRENT CONTROLS

Criminal and security intelligence in licensing decisions; Suitability monitoring between renewals; Suspension, cancellation and seizure powers; Firearms register; Interstate information exchange.

TREATMENTS

- T-01 Continuous suitability checking and supportive early intervention
- T-02 Intelligence-sharing protocol
- T-05 Register digitisation, audit and security

R11 Use of a licensee's firearm by an unlicensed household member against another person

CURRENT RISK: MEDIUM Rare · Major → RESIDUAL RISK: MEDIUM Rare · Major

RISK STATEMENT

A family member or member of the community is killed or seriously injured. An unlicensed household member or visitor takes a licensee's firearm and uses it against another person. They could reach the firearm, keys or combination.

SOURCE

Threat: **Unlicensed household members and visitors.** Use of a licensee's firearm against another person (Low)

MAIN ASSETS

Family and household members of licensees (VITAL); Community members (VITAL).

CURRENT CONTROLS

Safe storage requirements; Storage inspection and compliance; Family violence suspension and cancellation.

TREATMENTS

- T-04 Risk-based storage inspection and review of storage standards
- T-07 Household access assessment and published approval criteria

R12 Unintentional discharge by a child

CURRENT RISK: MEDIUM Rare · Major → RESIDUAL RISK: MEDIUM Rare · Major

RISK STATEMENT

A child or another person in the home is killed or seriously injured. A child finds a firearm that was left loaded or unsecured and fires it.

SOURCE

Hazard: **Human factors.** Child reaches an unsecured firearm (Emerging)

MAIN ASSETS

Family and household members of licensees (VITAL).

CURRENT CONTROLS

Firearms safety training; Safe storage requirements; Storage inspection and compliance.

TREATMENTS

- T-04 Risk-based storage inspection and review of storage standards
- T-14 Funded partnership with shooting associations and clubs
- T-11 Incident reporting and refresher safety training

R13 Loss of a large holding in a single theft

CURRENT RISK: MEDIUM Rare · Major → RESIDUAL RISK: MEDIUM Rare · Major

RISK STATEMENT

Members of the community are killed or seriously injured. Many firearms are lost in one theft from one address, where storage security did not keep pace with the size of the holding.

SOURCE

Threat: **Burglars and opportunistic criminals.** Theft of a large holding from one address (Medium)

MAIN ASSETS

Licensed firearms, controlled parts and ammunition (KEY); Community members (VITAL).

CURRENT CONTROLS

Permit to acquire; Safe storage requirements; Storage inspection and compliance; Numerical limits on firearms.

TREATMENTS

- T-04 Risk-based storage inspection and review of storage standards
- T-05 Register digitisation, audit and security

R14 Licence or permit obtained by deception

CURRENT RISK: MEDIUM Rare · Major → RESIDUAL RISK: MEDIUM Rare · Major

RISK STATEMENT

A member of the community is killed or seriously injured. A person gets a licence or permit to acquire by deception, or as a proxy for a prohibited person. The information that would expose the deception was not available to the Registry.

SOURCE

Threat: **Deceptive applicants.** Licence or permit obtained by deception or as a proxy (Medium)

MAIN ASSETS

Intelligence and suitability information (KEY); Community members (VITAL).

CURRENT CONTROLS

Suitability assessment at application; Criminal and security intelligence in licensing decisions; Genuine reason requirement; Permit to acquire; Interstate information exchange.

TREATMENTS

- T-02 Intelligence-sharing protocol
- T-01 Continuous suitability checking and supportive early intervention
- T-05 Register digitisation, audit and security

R15 Hunting or pest control incident

CURRENT RISK: MEDIUM Rare · Major → RESIDUAL RISK: MEDIUM Rare · Major

RISK STATEMENT

A shooter or bystander is killed or seriously injured on rural land. The cause is a hunting or pest control incident, such as a misidentified target or a ricochet, where the target or the firing area was not controlled.

SOURCE

Hazard: **Human factors.** Hunting or pest control incident (Emerging)

MAIN ASSETS

Licensees and authorised users (VITAL); Community members (VITAL).

CURRENT CONTROLS

Genuine reason requirement; Firearms safety training.

TREATMENTS

- T-11 Incident reporting and refresher safety training
- T-14 Funded partnership with shooting associations and clubs

R16 Threat or coercion with a lawfully held firearm

CURRENT RISK: MEDIUM Possible · Moderate → RESIDUAL RISK: MEDIUM Unlikely · Moderate

RISK STATEMENT

Family members or other victims suffer lasting psychological harm, fear and loss of freedom. A licensee shows or refers to a lawfully held firearm to threaten or control them, without firing it. The conduct does not reach police or the Registry.

SOURCE

Threat: **Family violence offenders.** Threat or coercion with a firearm (High)

MAIN ASSETS

Family and household members of licensees (VITAL); Community members (VITAL).

CURRENT CONTROLS

Suitability monitoring between renewals; Family violence suspension and cancellation; Suspension, cancellation and seizure powers; Safe storage requirements.

TREATMENTS

- T-01 Continuous suitability checking and supportive early intervention
- T-14 Funded partnership with shooting associations and clubs
- T-13 Consultative forum and confidential concern line

R17 Ammunition or controlled parts reaching unlicensed people

CURRENT RISK: MEDIUM Possible · Moderate → RESIDUAL RISK: MEDIUM Unlikely · Moderate

RISK STATEMENT

A member of the community is injured. An unlicensed person gets ammunition or controlled parts from a licensee, a dealer or online, which lets an illicit or privately made firearm be used.

SOURCE

Threat: **Unlicensed people seeking supply.** Acquisition of ammunition or controlled parts (Low)

MAIN ASSETS

Licensed firearms, controlled parts and ammunition (KEY); Community members (VITAL).

CURRENT CONTROLS

Ammunition and controlled parts; Firearms register; Illicit firearms enforcement and amnesty.

TREATMENTS

- T-08 Digital blueprint offence and reconciliation of parts and ammunition sales

R18 Cross-border movement exploiting regime differences

CURRENT RISK: MEDIUM Possible · Moderate → RESIDUAL RISK: MEDIUM Unlikely · Moderate

RISK STATEMENT

A member of the community is injured. Firearms or unsuitable people move across the NSW border. Different rules on each side and no shared register let a restriction in one jurisdiction be avoided in the other.

SOURCE

Threat: **Serious and organised criminals.** Movement of firearms or people across the NSW border (Medium)

MAIN ASSETS

Community members (VITAL); Licensed firearms, controlled parts and ammunition (KEY).

CURRENT CONTROLS

Interstate information exchange; ACT and NSW coordination; National Firearms Agreement.

TREATMENTS

- T-10 ACT and NSW data exchange and alignment
- T-05 Register digitisation, audit and security

R19 Unintentional discharge in handling, storage or transport

CURRENT RISK: MEDIUM Possible · Moderate → RESIDUAL RISK: MEDIUM Unlikely · Moderate

RISK STATEMENT

A licensee or a person nearby is seriously injured. A firearm discharges unintentionally during handling, cleaning, storage or transport because safe handling practice lapsed.

SOURCE

Hazard: **Human factors.** Unintentional discharge in handling, storage or transport (Emerging)

MAIN ASSETS

Licensees and authorised users (VITAL); Family and household members of licensees (VITAL).

CURRENT CONTROLS

Firearms safety training; Safe storage requirements; Approved clubs, ranges and supervision.

TREATMENTS

- T-11 Incident reporting and refresher safety training
- T-14 Funded partnership with shooting associations and clubs

R20 Firearms leaving the registered system

CURRENT RISK: MEDIUM Possible · Moderate → RESIDUAL RISK: MEDIUM Unlikely · Moderate

RISK STATEMENT

A member of the community is injured and the register becomes less accurate. Firearms above the numerical limit are not surrendered, sold or transferred, and so leave the registered system.

SOURCE

Hazard: **Regulatory change.** Firearms above the limit leave the registered system (Emerging)

MAIN ASSETS

Licensed firearms, controlled parts and ammunition (KEY); Register and licensing information (KEY).

CURRENT CONTROLS

Firearms register; Illicit firearms enforcement and amnesty; National firearms buyback.

TREATMENTS

- T-05 Register digitisation, audit and security
- T-12 Published performance measures and independent review
- T-13 Consultative forum and confidential concern line

R21 Reduced reporting of concerns

CURRENT RISK: MEDIUM Possible · Moderate → RESIDUAL RISK: MEDIUM Unlikely · Moderate

RISK STATEMENT

Early warning information is lost. Licensees, families and clubs become less willing to report concerns to the regulator after reforms that are seen as penalising compliant owners.

SOURCE

Hazard: **Regulatory change.** Reduced trust and reporting of concerns (Emerging)

MAIN ASSETS

Intelligence and suitability information (KEY); Public confidence in firearms regulation (KEY).

CURRENT CONTROLS

Health professional disclosure; Approved clubs, ranges and supervision.

TREATMENTS

- T-13 Consultative forum and confidential concern line
- T-14 Funded partnership with shooting associations and clubs
- T-03 Health and wellbeing pathway with voluntary temporary storage
- T-12 Published performance measures and independent review

R22 Erosion of club and association capacity

CURRENT RISK: MEDIUM Possible · Moderate → RESIDUAL RISK: MEDIUM Unlikely · Moderate

RISK STATEMENT

Training, supervision, peer oversight and early reporting of concerns decline. Volunteer-run clubs and associations lose capacity as cost, restriction and volunteer fatigue lead members and office-holders to leave organised shooting.

SOURCE

Hazard: **Regulatory change.** Erosion of club and association capacity (Emerging)

MAIN ASSETS

Clubs, ranges and dealers (KEY); Lawful firearm use (IMPORTANT).

CURRENT CONTROLS

Approved clubs, ranges and supervision.

TREATMENTS

- T-14 Funded partnership with shooting associations and clubs
- T-13 Consultative forum and confidential concern line
- T-12 Published performance measures and independent review

R23 Diversion by a licensee or dealer

CURRENT RISK: MEDIUM Unlikely · Moderate → RESIDUAL RISK: LOW Rare · Moderate

RISK STATEMENT

A member of the community is injured and public confidence is lost. A licensee or dealer diverts firearms to unlicensed people through a straw purchase, an off-book sale, a false loss report or an unmanaged deceased estate. A paper-based register does not detect it.

SOURCE

Threat: **Corrupt or negligent licensees and dealers.** Diversion of firearms to unlicensed people (Medium)

MAIN ASSETS

Licensed firearms, controlled parts and ammunition (KEY); Community members (VITAL); Public confidence in firearms regulation (KEY).

CURRENT CONTROLS

Permit to acquire; Firearms register; Dealer, club and transport security; Illicit firearms enforcement and amnesty.

TREATMENTS

- T-05 Register digitisation, audit and security
- T-09 Dealer, club and transit security review

R24 Range incident

CURRENT RISK: MEDIUM Unlikely · Moderate → RESIDUAL RISK: LOW Rare · Moderate

RISK STATEMENT

A shooter, range official or member of the public is seriously injured at an approved range. The cause is a breach of range rules or a defect in range design, and includes a projectile leaving the range.

SOURCE

Hazard: **Human factors.** Range incident (Benign)

MAIN ASSETS

Licensees and authorised users (VITAL); Clubs, ranges and dealers (KEY); Community members (VITAL).

CURRENT CONTROLS

Firearms safety training; Approved clubs, ranges and supervision.

TREATMENTS

- T-11 Incident reporting and refresher safety training
- T-14 Funded partnership with shooting associations and clubs

R25 Additional household licences widening access in the home

CURRENT RISK: MEDIUM Possible · Minor → RESIDUAL RISK: LOW Unlikely · Minor

RISK STATEMENT

Family and household members are more exposed to firearm harm. More household members get licences so that a household can keep its firearms under the numerical limit, which widens lawful access to firearms in the home.

SOURCE

Hazard: **Regulatory change.** Additional household licences to retain firearms (Emerging)

MAIN ASSETS

Family and household members of licensees (VITAL); Licensees and authorised users (VITAL).

CURRENT CONTROLS

Suitability assessment at application; Genuine reason requirement; Safe storage requirements; Numerical limits on firearms.

TREATMENTS

- T-07 Household access assessment and published approval criteria
- T-12 Published performance measures and independent review

R26 Incident involving a minor or supervised novice

CURRENT RISK: LOW Rare · Moderate → RESIDUAL RISK: LOW Rare · Moderate

RISK STATEMENT

A minor, a supervised unlicensed shooter or a person nearby is injured. The incident happens during supervised shooting because supervision was inadequate.

SOURCE

Hazard: **Human factors.** Incident involving a minor or supervised novice (Benign)

MAIN ASSETS

Licensees and authorised users (VITAL); Clubs, ranges and dealers (KEY).

CURRENT CONTROLS

Firearms safety training; Approved clubs, ranges and supervision.

TREATMENTS

- T-11 Incident reporting and refresher safety training
- T-14 Funded partnership with shooting associations and clubs

TABLE: Risk register

ANNEX F

Assessment methodology

The international standard for managing risk is ISO 31000:2018 *Risk management – Guidelines*.[183] The method used here is consistent with ISO 31000 and with the Security Risk Management Body of Knowledge.

The criteria below are those of the SRMBOK security risk management framework. Only the scales used in this assessment are shown. The framework also has consequence scales for information, property, economic assets, reputation, capability and compliance. They were not used to rate these risks and are left out. Three settings were applied. Consequence is rated on harm to any person. The threat tolerance threshold is set at Low. Likelihood is the chance of the event in the ACT in any one year.

Asset criticality criteria

RATING	CRITERIA
VITAL	The loss cannot be made good. No other service or facility can take the place of the asset. Loss would end, or stop for a long time, the function that depends on it.
KEY	Loss would place major limits on a core function, or stop or disrupt it for a long time.
IMPORTANT	Loss would place minor limits on a core function, or stop or disrupt it for a short time.
SUPPORTING	Normal services can go on if the asset is lost. Loss would not stop or disrupt a core function.

TABLE: Asset criticality criteria

Threat assessment criteria

A threat is rated by the intent and the capability of the actor.

CAPABILITY	INTENT: NONE	IMPLIED	EXPRESSED	COMMITTED	DEDICATED
Advanced	Low	Medium	High	Extreme	Extreme
Developed	Low	Medium	High	High	Extreme
Moderate	Negligible	Low	Medium	High	High
Emerging	Negligible	Negligible	Low	Medium	High
Undeveloped	Negligible	Negligible	Negligible	Low	Medium

TABLE: Threat rating by capability and intent

Threat acts rated Low and above are carried into the risk register.

183 ISO 31000:2018 *Risk management – Guidelines*.

INTENT	DESCRIPTOR
None	No desire. The actor has no drive or purpose, and does not believe they could carry out the act.
Implied	Some drive, pursued by mostly peaceful means. The actor believes they have little capacity to carry out the act.
Expressed	Highly motivated, with some room to compromise. The actor has a fair chance of carrying out the act.
Committed	Strong desire, little room to compromise and a readiness to use extreme measures. The actor expects to succeed.
Dedicated	Extreme motivation, with few limits and no room to compromise. The actor fully expects to succeed.

TABLE: Threat intent criteria

CAPABILITY	DESCRIPTOR
Advanced	Fully funded and resourced. Highly skilled and fully trained.
Developed	Well skilled and trained in tactics and techniques. Large funds or resources.
Moderate	Moderate funds or resources. Moderate training and skills.
EMERGING	Limited funds or resources. Limited knowledge and ability.
Undeveloped	Few or no resources or funds. No knowledge or training.

TABLE: Threat capability criteria

Hazard event criteria

RATING	CRITERIA
CRITICAL	The event would be intense, long-lasting, volatile and close. It could happen with little warning.
EMERGING	The event would be of moderate intensity, length and volatility. It could happen with some warning.
BENIGN	The event would be of low intensity, short and distant. It would come with ample warning.

TABLE: Hazard event criteria

Hazard events rated Benign and above are carried into the risk register.

Control effectiveness criteria

Each control was given one of the ratings below. The SRMBOK framework sets detailed tests for policy, assurance and compliance under each rating. Those tests need access to internal records, so only the headline criteria were applied in this desktop assessment.

RATING	CRITERIA
EXCELLENT	The control is well designed and works as intended. It manages the risk well.
GOOD	The control is well designed and works fairly well. Limited improvement is needed.
FAIR	The key parts of the control are in place. Significant improvement is needed.
POOR	The control is limited or partly ineffective. A high level of risk remains.
NON-EXISTENT	There is no control, or it has major faults and does not work as intended.
NOT YET IN FORCE	The control is passed or proposed but is not yet working. It is not rated.

TABLE: Control effectiveness criteria

Risk assessment criteria

The probability column governs each likelihood rating. The historical column is a guide. Where the two point to different ratings, the Risk Assessment section says so.

LIKELIHOOD	CHANCE IN THE ACT IN ANY ONE YEAR (GOVERNS)	HISTORICAL GUIDE
5. Almost Certain	90% or more	Happens in the ACT in most years.
4. Likely	65% to less than 90%	Has happened in the ACT in the last three years.
3. Possible	35% to less than 65%	Has happened in the ACT, or in similar jurisdictions, before.
2. Unlikely	10% to less than 35%	Has not happened in the ACT. Has happened now and then in similar jurisdictions.
1. Rare	Less than 10%	Could happen, but has not happened in the ACT or a similar jurisdiction.

TABLE: Likelihood criteria

CONSEQUENCE	HARM TO PEOPLE
Limited	Could endanger a person or cause limited harm, including injuries that are not serious or life-threatening.
Minor	Could lead to harm to a person.
Moderate	Could lead to significant physical or psychological harm or injury to a person.
Major	Could lead to life-threatening or serious injuries to several people, or the loss of one or two lives.
Severe	Could lead directly to the loss of three or more lives.

TABLE: Consequence criteria (harm to people)

	LIMITED	MINOR	MODERATE	MAJOR	SEVERE
5. Almost Certain	Medium	Medium	High	Very High	Very High
4. Likely	Medium	Medium	High	High	Very High
3. Possible	Low	Medium	Medium	High	High
2. Unlikely	Low	Low	Medium	Medium	High
1. Rare	Low	Low	Low	Medium	Medium

TABLE: Risk matrix

Each risk was then set against the thresholds below.

RISK RATING	WHAT IS NEEDED
VERY HIGH	Immediate action at the most senior level, with a detailed plan, resources and monitoring.
HIGH	The risk is above tolerance and must be reduced. It needs senior attention.
MEDIUM	Reduce the risk if it is cost-effective to do so. If not, set up monitoring and review the risk at set times. This is the tolerance threshold used here.
LOW	The risk is within tolerance. Manage it by standard procedures and watch for change.

TABLE: Risk tolerance

ANNEX G

Validation plan

This is a desktop assessment. No interviews were held and no sites were visited. The plan below sets out how the context, ratings and treatments can be tested. Timing and participation are yet to be agreed with each organisation.

WHO	WHAT WILL BE TESTED
Registrar of Firearms and ACT Firearms Registry	Review of the register, controls ratings (Annex D) and treatment owners and dates. Visit to the Registry.
ACT Policing, including family violence and intelligence functions	Review of R4, R8, R10 and R16, and of T-01 and T-02.
Justice and Community Safety Directorate	Review of the legal context, the Bill table (Annex H) and T-03, T-08, T-12 and T-14.
Health and Community Services Directorate and mental health services	Review of R1 and R5, and of T-03.
ACT Coroner's Court	Data on firearm deaths in the ACT by intent and licence status.
ACT Civil and Administrative Tribunal and ACT Ombudsman	Review of oversight controls.
NSW Police Force Firearms Registry	Review of R18 and T-10.
Approved clubs and associations	Review of Finding 2, R22 and T-11, T-13 and T-14. Visits to a sample of ranges and clubs.
Licensed firearms dealers	Review of R7, R17 and R23, and of T-08 and T-09. Visits to a sample of premises.
Rural landholders and vertebrate pest controllers	Review of R15.
Family violence services and victim advocates	Review of R8, R11 and R16.
Suicide prevention and public health specialists	Review of R1 and R5, and of T-03.
Licensees, with consent	Inspection of a sample of home storage.
Members of the Legislative Assembly and the Standing Committee on Legal Affairs	Comment on findings and treatments.

TABLE: Validation plan

ANNEX H

The Bill and the risks

The table sets each reform measure against the risks in the register. It shows the risks a measure reduces, the risks it adds to and the treatments that manage the gap.

MEASURE	STATUS	RISKS IT REDUCES	RISKS IT ADDS TO, OR GAP	MANAGED BY
Limit of five firearms, or ten or more for listed genuine reasons (proposed section 52A)[184]	In the Bill	R13	Adds R3, R20 and R25	T-06, T-07 and T-12
Changes to firearm categories and a ban on belt-fed firearms[185]	In the Bill	Not rated in this assessment	Not rated	None
Offence of possessing a digital blueprint for a firearm[186]	In the Bill	R2 and R17, in part	Does not track parts and ammunition	T-08
National firearms buyback[187]	Agreed with the Commonwealth	None directly. It lowers the number of registered firearms.	Adds R3 and R20	T-06 and T-12
Firearm prohibition orders[188]	Passed. Starts 9 November 2027.	R2 and R4	Adds R3	T-06
Updated National Firearms Agreement: shared criminal intelligence[189]	Signed 26 August 2026	R4, R10 and R14	Needs a protocol to reach the Registry	T-02

TABLE: The 2026 reform measures and the risks

Three points follow from the table.

- No measure is aimed at suicide by a licensee (R1) or by a household member (R5). T-03 and T-14 treat these risks.
- Three measures add to the strain on the Registry (R3). T-06 treats it.
- The limit on firearm numbers directly reduces one risk (R13). The risks it adds (R20 and R25) are managed by T-07 and T-12.

184 Firearms (Public Safety) Amendment Bill 2026 (ACT) cl 4, proposed s 52A.
185 Firearms (Public Safety) Amendment Bill 2026 (ACT) cll 4, 12, 14–21.
186 Firearms (Public Safety) Amendment Bill 2026 (ACT) cl 12, proposed s 228A.
187 Prime Minister of Australia, 'National partnership delivers ACT firearms buyback and stronger community protections' (media release, 22 August 2026).
188 *Firearms (Firearm Prohibition Orders) Amendment Act 2026* (ACT) (A2026-19) s 2, inserting ss 183F–183ZZQ. Notified 9 November 2026.
189 Prime Minister of Australia, 'Meeting of National Cabinet' (media release, 26 August 2026).

ANNEX I

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These sources inform the assessment. Footnotes in the text give the page, section or table for each claim.

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ANNEX J

Risk treatment plan

Each treatment is set out in the 4A format. The specification says why the treatment fits the cause, what is to be done and by whom, how completion will be judged and whose agreement is needed. Agreement will be sought through consultation on this assessment. The owner, dates and test of completion match the treatment cards in Annex K.

T-01 Continuous suitability checking and supportive early intervention

RELATED RISKS
R1 R4 R8 R9 R10 R14 R16

OWNER
Registrar of Firearms

COMPLETION DATE
30 June 2028

RISK DESCRIPTION
A licensee who has become unsuitable keeps firearms between renewals.

SPECIFICATION (4A)
This closes the gap between renewals (Finding 3). The Registrar, with ACT Policing, is to match all licensees each day against police, court, protection order and intelligence records. Each match is to be triaged within one business day, and club welfare contacts are to offer early support. It is complete when every licensee is matched daily and 95 per cent of matches are triaged within one business day, for two quarters in a row. Agreement is needed from the Registrar, the Chief Police Officer, the Justice and Community Safety Directorate, the ACT courts and participating clubs.

T-02 Intelligence-sharing protocol

RELATED RISKS
R4 R10 R14

OWNER
Chief Police Officer for the ACT

COMPLETION DATE
31 December 2027

RISK DESCRIPTION
Signs of extremism, criminal links or deception are held by one agency and are not known to the Registry.

SPECIFICATION (4A)
Facts that would change a licensing decision must reach the person who decides (R4, R10 and R14). The Chief Police Officer is to agree a written protocol with ASIO, the Australian Criminal Intelligence Commission and the Australian Federal Police. It is to set thresholds, time limits and one point of contact for advice to the Registry. It is complete when the protocol is signed, tested once in an exercise and set for yearly review. Agreement is needed from each of those agencies.

T-03 Health and wellbeing pathway with voluntary temporary storage

RELATED RISKS
R1 R5 R21

OWNER
Director-General, Justice and Community Safety Directorate

COMPLETION DATE
30 June 2028

RISK DESCRIPTION
A licensee or household member in crisis can reach a firearm, and the licensee has a reason to hide the problem.

SPECIFICATION (4A)
A licensee in crisis needs a way to step back from firearms without fear for their licence (Finding 4). The Justice and Community Safety Directorate is to set up voluntary temporary storage with police, dealers or clubs. Using it is to carry no licence consequence. Health services are to issue guidance on section 261 disclosure, and clubs are to promote both. It is complete when the scheme is open, the guidance has gone to all ACT general practices and mental health services, and use is reported each year. Agreement is needed from the Directorate, the Health and Community Services Directorate, the Registrar and shooting associations.

T-04 Risk-based storage inspection and review of storage standards

RELATED RISKS
R5 R6 R11 R12 R13

OWNER
Registrar of Firearms

COMPLETION DATE
30 June 2028

RISK DESCRIPTION
Firearms are stolen from homes, or reached by other people in the home, because storage is not assured.

SPECIFICATION (4A)
Storage checks need to go where the risk is highest (Finding 7). The Registrar is to run a risk-based program that puts large holdings, new licensees and homes not checked for five years first. The Registrar is also to review the storage step for large holdings and advise the Minister. It is complete when every holding of more than ten firearms has been checked within 12 months, all others are on a five-year schedule, and results are published each year. Agreement is needed from the Registrar, the Justice and Community Safety Directorate and shooting associations.

T-05 Register digitisation, audit and security

RELATED RISKS
R6 R7 R10 R13 R14 R18 R20 R23

OWNER
Chief Police Officer for the ACT

COMPLETION DATE
30 June 2028

RISK DESCRIPTION
A paper-based register cannot be audited, reconciled or shared, and a digital register holds sensitive data in one place.

SPECIFICATION (4A)
The register needs to support audit, analysis and timely exchange (Finding 6). ACT Policing is to make it digital and reconcile every record against a declaration from the licensee. A security assessment is to be done before it joins the National Firearms Register. It is complete when all records are digital, every record is reconciled and the Chief Police Officer has accepted the security assessment. Agreement is needed from the Chief Police Officer, the Registrar and the Department of Home Affairs.

T-06 Registry funding for the reform workload

RELATED RISKS
R3

OWNER
Minister for Police, Fire and Emergency Services

COMPLETION DATE
30 September 2027

RISK DESCRIPTION
Registry staff are moved from vetting, intelligence and compliance to run the reforms.

SPECIFICATION (4A)
The reform work needs its own funding (Finding 8). The Minister is to seek funded positions for reform work in the 2027–28 Budget. The Minister is also to set minimum staff numbers for vetting, intelligence and compliance, and have the Registry publish service standards. It is complete when the Budget papers fund the positions and the standards are published. Agreement is needed from the Minister, the Chief Minister, Treasury and Economic Development Directorate and the Chief Police Officer.

T-07 Household access assessment and published approval criteria

RELATED RISKS
R5 R11 R25

OWNER
Registrar of Firearms

COMPLETION DATE
31 December 2027

RISK DESCRIPTION
More household members get licences to keep firearms, which widens access in the home.

SPECIFICATION (4A)
The limit applies to each licensee, so a household can keep its firearms by adding licensees (R25). The Registrar is to assess the household when a second or later resident applies, and require separate storage access for each licensee. The Registrar is also to publish the criteria for approvals above the limit. It is complete when the assessment is part of the application process and the criteria are published. Agreement is needed from the Registrar, the Justice and Community Safety Directorate and shooting associations.

T-08 Digital blueprint offence and reconciliation of parts and ammunition sales

RELATED RISKS
R2 R17

OWNER
Director-General, Justice and Community Safety Directorate

COMPLETION DATE
31 December 2027

RISK DESCRIPTION
Privately made firearms are finished with controlled parts and commercial ammunition.

SPECIFICATION (4A)
Privately made firearms still need controlled parts and ammunition (Finding 10). The Justice and Community Safety Directorate is to bring the digital blueprint offence into force. The Registrar is to have dealers report sales of ammunition and controlled parts against the buyer's licence. It is complete when the offence is in force and dealer sales are received and checked each month. Agreement is needed from the Minister, the Registrar and licensed dealers.

T-09 Dealer, club and transit security review

RELATED RISKS
R7 R23

OWNER
Chief Police Officer for the ACT

COMPLETION DATE
30 June 2027

RISK DESCRIPTION
Dealers, clubs and vehicles in transit hold the largest numbers of firearms in one place.

SPECIFICATION (4A)
Dealers, clubs and vehicles in transit hold the most firearms in one place (R7). ACT Policing is to review the physical security, records and transport of every dealer and club, and agree fixes with each. It is complete when all premises are reviewed and the fixes are closed. Agreement is needed from ACT Policing, licensed dealers and approved clubs.

T-10 ACT and NSW data exchange and alignment

RELATED RISKS
R2 R18

OWNER
Minister for Police, Fire and Emergency Services

COMPLETION DATE
31 December 2027

RISK DESCRIPTION
Different ACT and NSW rules let a restriction in one jurisdiction be avoided in the other.

SPECIFICATION (4A)
An open border with different rules and no shared register lets a restriction in one place be avoided in the other (R18). The Minister is to agree with NSW an interim exchange of licence, suspension and theft data until the National Firearms Register operates. The two governments are also to list and reduce differences in their rules. It is complete when the arrangement is signed and data are exchanged at least each week. Agreement is needed from the ACT and NSW police ministers and both registries.

T-11 Incident reporting and refresher safety training

RELATED RISKS
R12 R15 R19 R24 R26

OWNER
Registrar of Firearms

COMPLETION DATE
30 June 2028

RISK DESCRIPTION
Unintentional harm comes from lapses in safe handling, supervision and storage.

SPECIFICATION (4A)
Safety training happens once, and incidents are not collected or shared (R12, R15, R19, R24 and R26). The Registrar, with clubs and associations, is to set up no-blame reporting of unintentional discharges and near misses, and publish a yearly summary. Refresher safety training is to be added at licence renewal. It is complete when the scheme runs, the first summary is published and refresher training is a renewal requirement. Agreement is needed from the Registrar, approved clubs and shooting associations.

T-12 Published performance measures and independent review

RELATED RISKS
R3 R20 R21 R22 R25

OWNER
Director-General, Justice and Community Safety Directorate

COMPLETION DATE
31 December 2027

RISK DESCRIPTION
The effect of controls and reforms on harm cannot be measured.

SPECIFICATION (4A)
No baseline exists against which to judge the controls or the reforms (Finding 9). The Justice and Community Safety Directorate is to publish yearly measures of firearm harm, thefts, licence actions, storage checks and Registry times. The first set is to be a baseline before the reforms start. An independent review is to follow within three years. It is complete when the baseline is published. Agreement is needed from the Minister, the Chief Police Officer and the ACT Coroner's Court.

T-13 Consultative forum and confidential concern line

RELATED RISKS
R1 R4 R9 R16 R20 R21 R22

OWNER
Registrar of Firearms

COMPLETION DATE
30 June 2027

RISK DESCRIPTION
Licensees, families and clubs become less willing to report concerns.

SPECIFICATION (4A)
Early warning depends on trust between licensees and the regulator (R21). The Registrar is to set up a standing forum with clubs, associations, dealers, and health and family violence services. The Registrar is also to open a confidential line for concerns about a licensee. It is complete when the forum has met twice and the line is open, with the number of reports published each year. Agreement is needed from the Registrar and the bodies invited to the forum.

T-14 Funded partnership with shooting associations and clubs

RELATED RISKS
R1 R3 R4 R5 R6 R8 R9 R12 R15 R16 R19 R21 R22 R24 R26

OWNER
Director-General, Justice and Community Safety Directorate

COMPLETION DATE
30 September 2027

RISK DESCRIPTION
Training, supervision, member support and early warning rest on volunteer-run clubs and associations that are not resourced for the role.

SPECIFICATION (4A)
Clubs and associations are the gateway to licensing and the main point of contact with licensees, and the work rests on volunteers (Finding 2). The Justice and Community Safety Directorate is to fund approved shooting associations and clubs, selected by open, criteria-based grant. The grant is to pay for entry and refresher safety training, member welfare and peer support, storage advice, and a staffed link to ACT Policing and the Registry. It is complete when multi-year funding is in the 2027–28 Budget, a grant agreement with performance measures is signed and the liaison function has reported. Agreement is needed from the Minister, the Directorate, the Registrar, ACT Policing and the associations.

TABLE: Risk treatment plan

ANNEX K

Treatment cards

This annex has one card for each treatment. Each card names one owner, the steps and dates, the measures of quality and a single dated test of completion. The dates and targets are proposals for the owners to test. Costs are not estimated. The cards agree with the specifications in Annex J.

CARD	TREATMENT	OWNER	COMPLETION DATE
1	T-01 Continuous suitability checking and supportive early intervention	Registrar of Firearms	30 June 2028
2	T-02 Intelligence-sharing protocol	Chief Police Officer for the ACT	31 December 2027
3	T-03 Health and wellbeing pathway with voluntary temporary storage	Director-General, Justice and Community Safety Directorate	30 June 2028
4	T-04 Risk-based storage inspection and review of storage standards	Registrar of Firearms	30 June 2028
5	T-05 Register digitisation, audit and security	Chief Police Officer for the ACT	30 June 2028
6	T-06 Registry funding for the reform workload	Minister for Police, Fire and Emergency Services	30 September 2027
7	T-07 Household access assessment and published approval criteria	Registrar of Firearms	31 December 2027
8	T-08 Digital blueprint offence and reconciliation of parts and ammunition sales	Director-General, Justice and Community Safety Directorate	31 December 2027
9	T-09 Dealer, club and transit security review	Chief Police Officer for the ACT	30 June 2027
10	T-10 ACT and NSW data exchange and alignment	Minister for Police, Fire and Emergency Services	31 December 2027
11	T-11 Incident reporting and refresher safety training	Registrar of Firearms	30 June 2028
12	T-12 Published performance measures and independent review	Director-General, Justice and Community Safety Directorate	31 December 2027
13	T-13 Consultative forum and confidential concern line	Registrar of Firearms	30 June 2027
14	T-14 Funded partnership with shooting associations and clubs	Director-General, Justice and Community Safety Directorate	30 September 2027

TABLE: Index of treatment cards

TREATMENT
T-01

TREATMENT CARD 1 OF 14

Continuous suitability checking and supportive early intervention

DESCRIPTION	Check every ACT licensee each day against police, court and protection order records, not just when a licence is issued or renewed. A trained Registry officer looks at each match and decides what to do. Club welfare contacts offer help early. This answers Finding 3. It reduces R1, R4, R8, R9, R10, R14 and R16.
ACCOUNTABILITY	Owner: Registrar of Firearms (appointed under s 33 of the *Firearms Act 1996*). Sponsor: Chief Police Officer for the ACT. Policy and any amendments: Justice and Community Safety Directorate. Minister: Minister for Police, Fire and Emergency Services. Partners: ACT Magistrates Court (protection orders and outcomes) and approved clubs (peer support, with T-14).
ACTIONS	1. Map each data source, its legal basis, quality and timeliness (by March 2027). 2. Complete privacy and human rights assessments, and draft any amendment needed for lawful access to the data (by June 2027). 3. Write triage thresholds, review rights and record-keeping rules. A data match alone is not to suspend a licence (by September 2027). 4. Build automated matching against the digital register, after T-05 step 2 (by March 2028). 5. Train triage staff and club welfare contacts, with T-14 (by March 2028). 6. Pilot for three months, then go live for all licensees (by 30 June 2028). 7. Report each quarter under T-12.
OUTPUTS	Data-source map and legal advice. Privacy impact assessment. Published triage procedure. Live daily matching service. Trained triage team. Network of club welfare contacts. Quarterly performance report.
SCOPE	In: all ACT adult, minors and composite entity licensees; ACT Policing records; ACT court outcomes; interim and final protection orders; firearm prohibition orders. Out: health records (T-03 and s 261 disclosures); social media monitoring; interstate records until the National Firearms Register operates (T-10).
CRITERIA	*Firearms Act 1996* (ACT) ss 5, 17–19, 79–81A. *Human Rights Act 2004* (ACT) s 12 (privacy and reputation) and s 28 (reasonable limits and less restrictive means). *Privacy Act 1988* (Cth), which the Australian Federal Police applies to its ACT services. The 2026 National Firearms Agreement commitment on shared criminal intelligence. ISO 31000:2018 cl 6.5 and 6.6.
RESOURCES	Triage staff, a data-integration build, legal and privacy advice, and training. To be costed by ACT Policing and the Justice and Community Safety Directorate for the 2027–28 Budget.
ORGANISATION	A triage cell in the Registry reports to the Registrar. The Registrar chairs a quarterly governance meeting with the Justice and Community Safety Directorate and the courts. Club welfare contacts stay separate from enforcement. Urgent threats go straight to police.
QUALITY AND STANDARDS	100% of licensees matched each day. At least 95% of matches triaged within one business day. 100% of urgent matches actioned the same day. False-match rate measured, with a target to be set at pilot. Every decision recorded with reasons and review rights. Independent audit each year.
ACHIEVED WHEN	Every licensee is matched each day. At least 95% of matches are triaged within one business day. Both hold for two quarters in a row. The Registry's published data (T-12) show this by 30 June 2028.
NOTES	Depends on T-05 (digital register) and T-14 (club welfare contacts). Risk: heavy-handed alerts could put people off seeking help or reporting concerns (R21), so support and enforcement are kept apart.

CARD 1: Continuous suitability checking and supportive early intervention

TREATMENT
T-02

TREATMENT CARD 2 OF 14

Intelligence-sharing protocol

DESCRIPTION	**Set a written rule for how security and criminal intelligence reaches the Registry. The rule says what must be passed on, how fast and to whom. This makes sure that facts which would change a licensing decision reach the person who decides. It reduces R4, R10 and R14.**
ACCOUNTABILITY	Owner: Chief Police Officer for the ACT. Partners: Registrar of Firearms, the Australian Security Intelligence Organisation, the Australian Criminal Intelligence Commission and the Australian Federal Police. Minister: Minister for Police, Fire and Emergency Services.
ACTIONS	1. List the intelligence holdings that bear on suitability and the legal basis for sharing each one (by March 2027). 2. Draft the protocol: thresholds, time limits, one point of contact and record-keeping (by June 2027). 3. Agree and sign the protocol with each partner (by September 2027). 4. Test it once in an exercise and fix any gaps (by November 2027). 5. Set a yearly review and report counts of advices under T-12 (by 31 December 2027).
OUTPUTS	Signed protocol. Exercise report. Yearly review schedule. Yearly count of advices given to the Registry.
SCOPE	In: advice to the Registry about applicants and licensees, and about people who live with them where the law allows. Out: the content of intelligence, which stays classified; daily matching against police and court records (T-01).
CRITERIA	*Firearms Act 1996* (ACT) ss 18(1)(c), 18A–18C (law enforcement and security sensitive information). *Human Rights Act 2004* (ACT) s 12 (privacy), s 21 (fair hearing) and s 28. *Privacy Act 1988* (Cth), which the Australian Federal Police applies to its ACT services. The 2026 National Firearms Agreement commitment on shared criminal intelligence. ISO 31000:2018 cl 6.5 and 6.6.
RESOURCES	Staff time in ACT Policing and partner agencies, and one exercise. To be costed by ACT Policing for the 2027–28 Budget.
ORGANISATION	The Chief Police Officer holds the protocol. The Registrar is the single point of contact for advice. Reviews of decisions that rest on protected information follow ss 18B and 18C of the Act.
QUALITY AND STANDARDS	Protocol signed by all four partners (yes or no). One exercise held each year. 100% of advices acknowledged by the Registry within the time limit set in the protocol. Count of advices published each year.
ACHIEVED WHEN	The protocol is signed by all partners and has been tested in one exercise. A yearly review date is set. The published measures (T-12) confirm this by 31 December 2027.
NOTES	Only counts can be published, not content. A person affected by protected information keeps the review rights in the Act. Links to T-01 (matching) and T-07 (household access).

CARD 2: Intelligence-sharing protocol

TREATMENT
T-03

TREATMENT CARD 3 OF 14

Health and wellbeing pathway with voluntary temporary storage

DESCRIPTION	Give a licensee in crisis a safe place to leave firearms for a time, by choice, with no cost to their licence. Give doctors and other health workers clear guidance on when to tell the Registrar of a concern. This answers Finding 4. It reduces R1, R5 and R21.
ACCOUNTABILITY	Owner: Director-General, Justice and Community Safety Directorate. Partners: Registrar of Firearms, Health and Community Services Directorate, ACT Policing, licensed dealers, and approved clubs and associations. Minister: Minister for Police, Fire and Emergency Services.
ACTIONS	1. Design the scheme with the Registrar, health services, dealers and clubs: who can store, for how long and how firearms are returned (by June 2027). 2. Get legal advice on whether the Act or Regulation needs to change, and complete a human rights and privacy assessment (by June 2027). 3. Make the rule that use of the scheme, by itself, carries no licence consequence (by December 2027). 4. Issue guidance on section 261 disclosure to ACT general practices and mental health services (by December 2027). 5. Promote the scheme and the guidance through clubs, with T-14 (by March 2028). 6. Open the scheme to all licensees (by 30 June 2028). 7. Report use each year under T-12.
OUTPUTS	Scheme rules. Legal advice. Any amendment. Section 261 guidance for practitioners. Club and dealer storage agreements. Yearly count of use.
SCOPE	In: voluntary, temporary storage for any ACT licensee, and for firearms a household member could reach. Out: compulsory suspension, cancellation and seizure (ss 79–81 of the Act); family violence orders (s 44 of the *Family Violence Act 2016*).
CRITERIA	*Firearms Act 1996* (ACT) s 5, s 261 and pt 12 (storage at the place of safe keeping). *Human Rights Act 2004* (ACT) s 12 (privacy and reputation) and s 28 (reasonable limits and less restrictive means). *Information Privacy Act 2014* (ACT) for ACT directorates. ISO 31000:2018 cl 6.5 and 6.6.
RESOURCES	Policy and legal staff, storage capacity with police, dealers or clubs, and guidance material. To be costed by the Justice and Community Safety Directorate for the 2027–28 Budget.
ORGANISATION	The Justice and Community Safety Directorate leads policy. The Registrar runs the scheme. Health services issue the guidance. Requests are handled apart from compliance work, so that asking for help is not treated as a breach.
QUALITY AND STANDARDS	Scheme open to 100% of licensees. Zero licence actions taken only because a licensee used the scheme, checked by audit each year. Guidance sent to 100% of ACT general practices and public mental health services. Time to accept a storage request measured, with a target to be set at pilot.
ACHIEVED WHEN	The scheme is open to all licensees. The section 261 guidance has gone to all ACT general practices and mental health services. The first yearly count of use is published (T-12). All three are met by 30 June 2028.
NOTES	Trust decides whether the scheme is used. If licensees fear that a request will be read as a health concern, they will not ask. This assessment found no such pathway today. Works with T-14 (club welfare contacts) and T-13 (concern line).

CARD 3: Health and wellbeing pathway with voluntary temporary storage

TREATMENT
T-04

TREATMENT CARD 4 OF 14

Risk-based storage inspection and review of storage standards

DESCRIPTION	Check home storage where the risk is highest first: large holdings, new licensees and homes not checked for five years. Review whether the storage rules for large holdings match the theft risk. Publish the results. This answers Finding 7. It reduces R5, R6, R11, R12 and R13.
ACCOUNTABILITY	Owner: Registrar of Firearms. Sponsor: Chief Police Officer for the ACT. Regulation changes: Justice and Community Safety Directorate. Minister: Minister for Police, Fire and Emergency Services. Partners: approved clubs and associations (storage advice, with T-14).
ACTIONS	1. Set the risk criteria for choosing homes to check: size of holding, new licence, time since last check (by June 2027). 2. Publish last year's number of storage checks as a baseline, with T-12 (by September 2027). 3. Start the program: every holding of more than ten firearms within 12 months, and all others within five years (from July 2027). 4. Review the storage step in s 44A of the Regulation against theft data, and advise the Minister on any change, such as an alarm for large holdings (by December 2027). 5. Publish results each year (first report by 30 June 2028).
OUTPUTS	Published risk criteria. Inspection schedule. Advice to the Minister on storage standards. Yearly report of checks done, breaches found and action taken.
SCOPE	In: storage at homes and other places where ACT licensees keep firearms. Out: dealer and club premises (T-09); firearms in transit (T-09).
CRITERIA	*Firearms Act 1996* (ACT) pt 12, ss 180–183. *Firearms Regulation 2008* (ACT) ss 44A and 47. *Human Rights Act 2004* (ACT) s 12 (privacy and reputation) and s 28 (reasonable limits and less restrictive means). *Privacy Act 1988* (Cth), which the Australian Federal Police applies to its ACT services. ISO 31000:2018 cl 6.5 and 6.6.
RESOURCES	Inspecting officers and a scheduling tool. To be costed by ACT Policing for the 2027–28 Budget. Targeting improves once the register is digital (T-05).
ORGANISATION	The compliance team in the Firearms Registry runs the program and reports to the Registrar. Clubs give storage advice to members but do not inspect.
QUALITY AND STANDARDS	100% of holdings of more than ten firearms checked every 12 months. At least 20% of all other holdings checked each year. Breaches followed up within a time to be set at pilot. Results published each year.
ACHIEVED WHEN	Every holding of more than ten firearms has been checked in the past 12 months. A five-year schedule covers all other holdings. The first yearly results are published (T-12) by 30 June 2028.
NOTES	A home check limits privacy, so each one needs a lawful basis and a clear reason. The proposed limit on firearm numbers would cut the number of large holdings. The power police use for routine checks needs to be confirmed with the Registry.

CARD 4: Risk-based storage inspection and review of storage standards

TREATMENT
T-05

TREATMENT CARD 5 OF 14

Register digitisation, audit and security

DESCRIPTION	**Move the firearms register from paper to a secure digital system. Check every record against what each licensee declares. Test the security of the system before it joins the National Firearms Register. This answers Finding 6. It reduces R6, R7, R10, R13, R14, R18, R20 and R23.**
ACCOUNTABILITY	Owner: Chief Police Officer for the ACT. Delivery: Registrar of Firearms. Partner: Department of Home Affairs (National Firearms Register). Minister: Minister for Police, Fire and Emergency Services.
ACTIONS	1. Agree the data standard and plan with the Department of Home Affairs (by March 2027). 2. Put all licence and firearm records into the digital system (by December 2027). 3. Reconcile every record against a declaration from the licensee, and resolve each mismatch (by March 2028). 4. Complete a protective security assessment and have the Chief Police Officer accept it (by 30 June 2028). 5. Connect to the National Firearms Register when it operates.
OUTPUTS	Digital register. Reconciliation report with the number of mismatches found and fixed. Accepted security assessment. Connection to the national register.
SCOPE	In: all ACT licence, permit and firearm records, and dealer returns. Out: daily matching of licensees (T-01); reconciliation of ammunition and parts sales (T-08).
CRITERIA	*Firearms Act 1996* (ACT) s 5(2)(b) and pt 11 (ss 156–158: the register, its link to the national scheme, and its confidentiality). *Human Rights Act 2004* (ACT) s 12 (privacy and reputation) and s 28 (reasonable limits and less restrictive means). *Privacy Act 1988* (Cth), which the Australian Federal Police applies to its ACT services. National Firearms Register requirements set by the Department of Home Affairs. ISO 31000:2018 cl 6.5 and 6.6.
RESOURCES	System build, data entry, reconciliation staff and a security assessor. To be costed by ACT Policing for the 2027–28 Budget. Any Commonwealth share is to be confirmed with the Department of Home Affairs.
ORGANISATION	A project team in ACT Policing reports to the Chief Police Officer. The Registrar signs off data quality. An assessor who did not build the system does the security assessment.
QUALITY AND STANDARDS	100% of records digital. 100% of records reconciled, with the mismatch rate published. Security assessment accepted before connection (yes or no). Access to the register logged and audited each year.
ACHIEVED WHEN	All records are digital. Every record has been reconciled. The Chief Police Officer has accepted the security assessment. The published measures (T-12) confirm all three by 30 June 2028.
NOTES	ACT Policing told the Assembly committee it hoped for a digital system within two years. A digital register holds storage addresses in one place, so its security matters as much as its accuracy. T-01, T-04 and T-08 depend on this treatment.

CARD 5: Register digitisation, audit and security

TREATMENT
T-06

TREATMENT CARD 6 OF 14

Registry funding for the reform workload

DESCRIPTION	**Fund the Registry for the extra work the reforms bring. Set a floor under the staff who vet applicants, assess intelligence and check storage. Publish how long the Registry takes to do its work. This answers Finding 8. It reduces R3.**
ACCOUNTABILITY	Owner: Minister for Police, Fire and Emergency Services. Budget advice: Justice and Community Safety Directorate and the Chief Minister, Treasury and Economic Development Directorate. Delivery: Chief Police Officer for the ACT and the Registrar of Firearms.
ACTIONS	1. Assess the Registry's workload: applications, approvals above the limit, surrenders and prohibition orders (by March 2027). 2. Prepare a 2027–28 Budget bid for reform positions (to the Budget timetable). 3. Set minimum staff numbers for vetting, intelligence and compliance (by June 2027). 4. Publish service standards for processing times (by 30 September 2027). 5. Report against the standards each quarter under T-12.
OUTPUTS	Workload assessment. Budget bid. Funded positions. Minimum staffing rule. Published service standards. Quarterly report.
SCOPE	In: Registry staff and systems for licensing, permits, compliance, surrenders and prohibition orders. Out: buyback compensation, which the Commonwealth and the ACT fund separately; the register build (T-05).
CRITERIA	*Firearms Act 1996* (ACT) s 5 and ss 17–19 (the checks the staff carry out). The ACT Policing Arrangement and Purchase Agreement. *Financial Management Act 1996* (ACT). ISO 31000:2018 cl 6.5 and 6.6.
RESOURCES	Positions and funding to be costed by ACT Policing and the Justice and Community Safety Directorate for the 2027–28 Budget. The Commonwealth funds 75 per cent of ACT buyback compensation and administration costs, which does not cover ongoing Registry work.
ORGANISATION	The Minister takes the bid to Budget. The Chief Police Officer manages the positions under the purchase agreement. The Registrar reports workload and processing times.
QUALITY AND STANDARDS	Reform positions funded in the 2027–28 Budget (yes or no). Minimum staff numbers met in 100% of months. Service standards published. Share of applications decided within the standard reported each quarter, with the standard to be set by the Registrar.
ACHIEVED WHEN	The 2027–28 Budget papers fund the reform positions. The Registry has published its service standards. Both are done by 30 September 2027.
NOTES	ACT Policing told the Assembly committee that applications had risen by about 50 a month and that the reforms had resource implications. This assessment found no announced funding for the ongoing work. Version 0.2 tied completion to three quarters of results by the same date, which could not be met. That test now sits in the quarterly report.

CARD 6: Registry funding for the reform workload

TREATMENT
T-07

TREATMENT CARD 7 OF 14

Household access assessment and published approval criteria

DESCRIPTION	When a second or later person at one address applies for a licence, look at the whole household. Make sure each licensee has separate access to storage. Publish the rules for approvals above the limit. This manages a risk the limit creates. It reduces R5, R11 and R25.
ACCOUNTABILITY	Owner: Registrar of Firearms. Policy: Justice and Community Safety Directorate. Minister: Minister for Police, Fire and Emergency Services. Partners: approved clubs and associations.
ACTIONS	1. Write the household assessment: who lives at the address, who can reach each safe, and any concern about a resident (by June 2027). 2. Complete a human rights and privacy assessment (by June 2027). 3. Add the assessment to the application process for a second or later licensee at an address (by September 2027). 4. Publish the criteria for approvals above the limit (by 31 December 2027, or before section 52A starts if that is earlier). 5. Report the number of second and later household licences each year under T-12.
OUTPUTS	Household assessment procedure. Updated application form. Published approval criteria. Yearly count of household licences.
SCOPE	In: new licence applications from a second or later resident of an address; approvals above the limit under proposed s 52A. Out: existing joint storage that already complies; family violence orders (s 44 of the *Family Violence Act 2016*).
CRITERIA	*Firearms Act 1996* (ACT) s 19(1)(a) (domestic circumstances and responsible control), pt 12 (storage) and proposed s 52A. *Human Rights Act 2004* (ACT) s 12 (privacy and reputation) and s 28 (reasonable limits and less restrictive means). *Privacy Act 1988* (Cth), which the Australian Federal Police applies to its ACT services. ISO 31000:2018 cl 6.5 and 6.6.
RESOURCES	Assessment time in the Registry. To be costed with T-06.
ORGANISATION	Licensing officers in the Registry do the assessment. The Registrar decides. Review by the ACT Civil and Administrative Tribunal applies.
QUALITY AND STANDARDS	100% of second and later household applications assessed. Approval criteria published before section 52A starts (yes or no). Count of household licences published each year.
ACHIEVED WHEN	The household assessment is part of the application process. The criteria for approvals above the limit are published. Both are done by 31 December 2027, or before section 52A starts if that is earlier.
NOTES	ACT Policing told the Assembly committee it had seen more applications from partners of current licensees. Needed only if the limit in the Bill becomes law. Version 0.2 gave no fixed date. Risk: the assessment must not treat family members as suspects without cause (R21).

CARD 7: Household access assessment and published approval criteria

TREATMENT
T-08

TREATMENT CARD 8 OF 14

Digital blueprint offence and reconciliation of parts and ammunition sales

DESCRIPTION	Bring the digital blueprint offence into force. Have dealers report sales of ammunition and controlled parts so that each sale can be checked against a licence. This answers Finding 10. It reduces R2 and R17.
ACCOUNTABILITY	Owner: Director-General, Justice and Community Safety Directorate. Delivery of reporting: Registrar of Firearms. Partners: licensed dealers. Minister: Minister for Police, Fire and Emergency Services.
ACTIONS	1. If the Assembly passes clause 12 of the Bill, set its start date (to the Bill's timetable). 2. Design electronic reporting of dealer sales, and draft any change to the Regulation (by June 2027). 3. Pilot reporting with dealers (by September 2027). 4. Receive sales data from every dealer each month and check it against licences, after T-05 step 2 (by 31 December 2027). 5. Report mismatches found and action taken each year under T-12.
OUTPUTS	Offence in force. Reporting standard for dealers. Monthly reconciliation. Yearly report of mismatches and outcomes.
SCOPE	In: sales of ammunition and controlled parts by ACT dealers; possession of digital blueprints. Out: sales by interstate and online sellers, which need the National Firearms Register and T-10.
CRITERIA	Firearms (Public Safety) Amendment Bill 2026 cl 12 (proposed s 228A). *Firearms Act 1996* (ACT) ss 244 and 248 (ammunition). The 2026 National Firearms Agreement commitment on 3D-printed firearms. *Privacy Act 1988* (Cth), which the Australian Federal Police applies to its ACT services. ISO 31000:2018 cl 6.5 and 6.6.
RESOURCES	Reporting system and Registry time. To be costed by ACT Policing and the Justice and Community Safety Directorate for the 2027–28 Budget.
ORGANISATION	The Justice and Community Safety Directorate leads the law. The Registry receives and checks the data. Dealers report through one channel.
QUALITY AND STANDARDS	Offence in force (yes or no). 100% of dealers reporting each month. 100% of mismatches reviewed, within a time to be set at pilot.
ACHIEVED WHEN	Section 228A is in force. Every dealer reports sales each month and the Registry checks them against licences. The published measures (T-12) confirm both by 31 December 2027.
NOTES	The first step depends on the Assembly. Club sales of ammunition (s 245 of the Act) need the same treatment in a later stage. This assessment found no central check of these sales today.

CARD 8: Digital blueprint offence and reconciliation of parts and ammunition sales

TREATMENT
T-09

TREATMENT CARD 9 OF 14

Dealer, club and transit security review

DESCRIPTION	**Review the security of every dealer and club, and of firearms on the move. Agree fixes with each one and see them done. These places hold the most firearms in one spot. It reduces R7 and R23.**
ACCOUNTABILITY	Owner: Chief Police Officer for the ACT. Delivery: Registrar of Firearms. Partners: licensed dealers and approved clubs. Minister: Minister for Police, Fire and Emergency Services.
ACTIONS	1. Set the review standard: physical security, records and transport (by December 2026). 2. Review every dealer and club premises (by March 2027). 3. Agree corrective actions and dates with each one (by April 2027). 4. Confirm that each action is closed (by 30 June 2027). 5. Repeat the review on a cycle set by the Registrar.
OUTPUTS	Review standard. A report for each premises. Agreed corrective actions. Closure report.
SCOPE	In: all ACT dealer premises, approved club armouries and ranges, and transport of firearms by dealers and clubs. Out: home storage (T-04).
CRITERIA	*Firearms Act 1996* (ACT) pt 12 and the dealer and club duties in the Act and the *Firearms Regulation 2008*. ISO 31000:2018 cl 6.5 and 6.6.
RESOURCES	Police crime-prevention and Registry staff. To be costed by ACT Policing. Fixes are paid for by the dealer or club unless a grant under T-14 applies.
ORGANISATION	A review team in ACT Policing reports to the Chief Police Officer. Each dealer or club names one contact.
QUALITY AND STANDARDS	100% of premises reviewed. 100% of corrective actions closed or given a dated plan. Thefts from dealers and clubs reported each year under T-12.
ACHIEVED WHEN	Every dealer and club premises has been reviewed. Every corrective action is closed. The published measures (T-12) confirm this by 30 June 2027.
NOTES	This assessment found no published security review of these premises. Review reports must be kept secure, as they describe weaknesses.

CARD 9: Dealer, club and transit security review

TREATMENT
T-10

TREATMENT CARD 10 OF 14

ACT and NSW data exchange and alignment

DESCRIPTION	**Agree with NSW to swap licence, suspension and theft data until the national register is running. List where ACT and NSW rules differ, and reduce the gaps. The ACT sits inside NSW with an open border. It reduces R2 and R18.**
ACCOUNTABILITY	Owner: Minister for Police, Fire and Emergency Services. Delivery: Chief Police Officer for the ACT and the Registrar of Firearms. Policy: Justice and Community Safety Directorate. Partners: NSW Government, NSW Police Force and its Firearms Registry.
ACTIONS	1. List the data each side needs and the legal basis to share it (by March 2027). 2. List the differences in categories, limits and licence rules, with options to reduce them (by June 2027). 3. Agree and sign an interim exchange arrangement (by September 2027). 4. Exchange data at least each week (by 31 December 2027). 5. End the interim arrangement when the National Firearms Register operates.
OUTPUTS	Signed arrangement. Weekly data exchange. Paper on rule differences and options.
SCOPE	In: licences, suspensions, cancellations, prohibition orders and reported thefts in the ACT and NSW. Out: other States and Territories, which the National Firearms Register is to cover.
CRITERIA	*Firearms Act 1996* (ACT) s 156 (link to the national scheme). *Privacy Act 1988* (Cth), which the Australian Federal Police applies to its ACT services. The 2026 National Firearms Agreement. *Human Rights Act 2004* (ACT) s 12 (privacy and reputation) and s 28 (reasonable limits and less restrictive means). ISO 31000:2018 cl 6.5 and 6.6.
RESOURCES	Staff time and a secure data link. To be costed by ACT Policing for the 2027–28 Budget.
ORGANISATION	Ministers sign the arrangement. The two registries run the exchange. The Justice and Community Safety Directorate leads work on rule differences.
QUALITY AND STANDARDS	Arrangement signed (yes or no). Data exchanged in at least 50 of 52 weeks each year. Each cross-border match actioned within a time to be set in the arrangement.
ACHIEVED WHEN	The ACT and NSW have signed the arrangement. Data are exchanged at least each week. The published measures (T-12) confirm both by 31 December 2027.
NOTES	Depends on NSW agreeing. The National Firearms Register is due by mid-2028 and replaces this treatment. Depends on T-05 for digital records.

CARD 10: ACT and NSW data exchange and alignment

TREATMENT
T-11

TREATMENT CARD 11 OF 14

Incident reporting and refresher safety training

DESCRIPTION	**Collect reports of unintentional discharges and near misses, with no blame. Share what is learnt each year. Add refresher safety training when a licence is renewed. It reduces R12, R15, R19, R24 and R26.**
ACCOUNTABILITY	Owner: Registrar of Firearms. Policy and any amendment: Justice and Community Safety Directorate. Partners: approved clubs and associations, with T-14. Minister: Minister for Police, Fire and Emergency Services.
ACTIONS	1. Design the no-blame reporting scheme with clubs (by June 2027). 2. Open the scheme (by September 2027). 3. Draft the refresher training and any change to the law needed to make it a renewal requirement (by December 2027). 4. Publish the first yearly summary of incidents and lessons (by 30 June 2028). 5. Make refresher training a renewal requirement (by 30 June 2028).
OUTPUTS	Reporting scheme. Yearly summary of incidents and lessons. Refresher training course. Renewal requirement.
SCOPE	In: unintentional discharges, near misses and range, hunting and pest control incidents that involve ACT licensees. Out: deliberate acts, which police investigate.
CRITERIA	*Firearms Act 1996* (ACT) ss 20 and 58(2)(c) (approved training courses). *Firearms Regulation 2008* (ACT) s 8 (club reporting). *Privacy Act 1988* (Cth), which the Australian Federal Police applies to its ACT services for reports that name a person. ISO 31000:2018 cl 6.5 and 6.6.
RESOURCES	Scheme administration and course development. To be costed by ACT Policing, with delivery through clubs funded under T-14.
ORGANISATION	The Registry runs the scheme. Clubs collect reports and deliver training. Reports are used to learn, not to take action against a licence, unless they show a serious breach.
QUALITY AND STANDARDS	Scheme open to 100% of approved clubs. Yearly summary published. Refresher training completed for 100% of renewals once the requirement starts. Count of reports published each year.
ACHIEVED WHEN	The reporting scheme is open. The first yearly summary is published. Refresher training is a renewal requirement. All three are met by 30 June 2028.
NOTES	A no-blame scheme works only if reporters trust it (R21). The legal basis for making refresher training a renewal requirement is to be confirmed.

CARD 11: Incident reporting and refresher safety training

TREATMENT
T-12

TREATMENT CARD 12 OF 14

Published performance measures and independent review

DESCRIPTION	Publish yearly figures that show whether firearm controls work. Start with a baseline before the reforms begin. Commission an independent review of the reforms. This answers Finding 9. It reduces R3, R20, R21, R22 and R25.
ACCOUNTABILITY	Owner: Director-General, Justice and Community Safety Directorate. Data: Chief Police Officer for the ACT, Registrar of Firearms and the ACT Coroner's Court. Minister: Minister for Police, Fire and Emergency Services.
ACTIONS	1. Define the measures with ACT Policing and the Coroners Court (by March 2027). 2. Publish the baseline before the reforms start (by 31 December 2027). 3. Publish the measures each year after that. 4. Commission an independent review within three years of the reforms starting.
OUTPUTS	Published list of measures. Baseline report. Yearly report. Independent review report.
SCOPE	In: firearm deaths and injuries by intent and licence status; thefts and recoveries; suspensions, cancellations and seizures; storage checks; Registry processing times; use of T-03; household licences. Out: data that would identify a person.
CRITERIA	ISO 31000:2018 cl 6.6 (monitoring and review). *Firearms Act 1996* (ACT) s 5. *Information Privacy Act 2014* (ACT) for ACT directorates. *Privacy Act 1988* (Cth), which the Australian Federal Police applies to its ACT services.
RESOURCES	Analyst time and data extraction. To be costed by the Justice and Community Safety Directorate for the 2027–28 Budget. Easier once the register is digital (T-05).
ORGANISATION	The Justice and Community Safety Directorate publishes the report. ACT Policing and the Coroners Court supply data under a written agreement.
QUALITY AND STANDARDS	Baseline published before the reforms start (yes or no). 100% of listed measures reported each year. Report published within six months of the end of each year. Independent reviewer appointed by open process.
ACHIEVED WHEN	The baseline report is published on an ACT Government website by 31 December 2027.
NOTES	Other treatments use these published measures as their test of completion. Small numbers must be grouped to protect privacy. The Firearm Prohibition Orders Act already requires a ministerial review of that scheme after three years.

CARD 12: Published performance measures and independent review

TREATMENT
T-13

TREATMENT CARD 13 OF 14

Consultative forum and confidential concern line

DESCRIPTION	**Set up a standing forum where the regulator, clubs, dealers, and health and family violence services meet. Open a confidential line for anyone worried about a licensee. Trust is what brings early warning to the Registry. It reduces R1, R4, R9, R16, R20, R21 and R22.**
ACCOUNTABILITY	Owner: Registrar of Firearms. Sponsor: Chief Police Officer for the ACT. Partners: approved clubs and associations, licensed dealers, health services and family violence services. Minister: Minister for Police, Fire and Emergency Services.
ACTIONS	1. Invite members and agree terms of reference (by January 2027). 2. Hold the first forum meeting (by March 2027). 3. Open the confidential concern line, with a triage rule for each report (by May 2027). 4. Hold the second forum meeting (by 30 June 2027). 5. Publish the number of reports each year under T-12.
OUTPUTS	Terms of reference. Forum minutes. Concern line and triage rule. Yearly count of reports.
SCOPE	In: consultation on rules and practice; concerns about the conduct or wellbeing of an ACT licensee. Out: emergencies, which go to triple zero; complaints about police.
CRITERIA	*Firearms Act 1996* (ACT) s 5 and ss 17–19. *Human Rights Act 2004* (ACT) s 12 (privacy and reputation) and s 28 (reasonable limits and less restrictive means). *Privacy Act 1988* (Cth), which the Australian Federal Police applies to its ACT services. ISO 31000:2018 cl 6.5 and 6.6.
RESOURCES	Secretariat time and a staffed phone or web line. To be costed by ACT Policing for the 2027–28 Budget.
ORGANISATION	The Registrar chairs the forum. Reports to the line are triaged in the Registry under the T-01 thresholds. Supportive follow-up is kept apart from enforcement.
QUALITY AND STANDARDS	At least two forum meetings each year. 100% of reports triaged within one business day. Count of reports and outcomes published each year. False or malicious reports counted.
ACHIEVED WHEN	The forum has met twice. The concern line is open. The published measures (T-12) confirm both by 30 June 2027.
NOTES	A concern line can be misused. Each report needs a check of its basis before any action, and the person reported keeps their review rights. Links to T-01 (triage) and T-14 (club liaison).

CARD 13: Consultative forum and confidential concern line

TREATMENT
T-14

TREATMENT CARD 14 OF 14

Funded partnership with shooting associations and clubs

DESCRIPTION	Fund approved shooting associations and clubs, selected by open, criteria-based grant. The grant pays for safety training, member support, storage advice and a staffed link to police. Clubs are where licensees are trained and known. This answers Finding 2. It helps to reduce R1, R3, R4, R5, R6, R8, R9, R12, R15, R16, R19, R21, R22, R24 and R26.
ACCOUNTABILITY	Owner: Director-General, Justice and Community Safety Directorate. Partners: Registrar of Firearms and ACT Policing (liaison), approved shooting associations and clubs (delivery). Budget advice: Chief Minister, Treasury and Economic Development Directorate. Minister: Minister for Police, Fire and Emergency Services.
ACTIONS	1. Write grant guidelines and selection criteria with the Registrar (by March 2027). 2. Prepare a 2027–28 Budget bid for multi-year funding (to the Budget timetable). 3. Run an open grant round (by July 2027). 4. Sign grant agreements with performance measures (by 30 September 2027). 5. Start the liaison function, and report each quarter to the consultative forum (T-13). 6. Evaluate the program independently after three years, as part of T-12.
OUTPUTS	Grant guidelines. Signed grant agreements. Training to a common standard. Club welfare contacts. Liaison function. Quarterly reports. Evaluation report.
SCOPE	In: entry and refresher safety training, member welfare and peer support, storage and compliance advice, and liaison with ACT Policing and the Registry. Out: range building works; costs of competition; licensing decisions, which stay with the Registrar.
CRITERIA	*Firearms Act 1996* (ACT) ss 20 and 58(2)(c) (approved courses) and table 61 (approved clubs). *Firearms Regulation 2008* (ACT) s 8. *Financial Management Act 1996* (ACT) and ACT Government grant rules. *Information Privacy Act 2014* (ACT) for ACT directorates. ISO 31000:2018 cl 6.5 and 6.6.
RESOURCES	Multi-year grant funding and a grants officer. To be costed by the Justice and Community Safety Directorate for the 2027–28 Budget.
ORGANISATION	The Justice and Community Safety Directorate runs the grant. Funded bodies deliver the work and account for it under their agreements. The liaison function reports to the consultative forum. Welfare support is kept apart from enforcement.
QUALITY AND STANDARDS	Grant round open to all approved associations and clubs (yes or no). 100% of agreements carry performance measures and financial acquittal. Courses delivered, members reached and referrals made reported each quarter. Independent evaluation at three years.
ACHIEVED WHEN	Multi-year funding is in the 2027–28 Budget papers. At least one grant agreement with performance measures is signed. The liaison function has given its first quarterly report. All three are met by 30 September 2027.
NOTES	The author has held office in shooting associations (see the Declaration of interests). For that reason this treatment names no recipient. This assessment found no public funding for club training and supervision. T-01, T-03 and T-11 rely on club delivery.

CARD 14: Funded partnership with shooting associations and clubs

ANNEX L

SECTARA

The risk register is built and maintained in SECTARA.

ANNEX M

Disclaimer

This assessment was not commissioned. It is a desktop review based on public sources which are listed in Annex I and the assessor's knowledge and experience. No person or agency supplied information for it, and no interviews or site inspections were done.

The ratings are the assessor's judgement against the stated criteria. They have not yet been tested with the Registrar of Firearms or other stakeholders. Annex G sets out how that will be done.

Public sources can be incomplete or out of date. Where a claim could not be checked at a primary source, the text says what the assessment found. Readers need to confirm any fact that a decision rests on.

The assessment offers one view of the risks in its scope. Each treatment needs review by the office that would own it before it is adopted. The author's interests are declared at the front of this document.

ANNEX N

Terms and definitions

TERM	DEFINITION
4A	A format for writing risk treatments: Appropriate, Actionable, Achievable and Agreed.
4C	A format for writing findings: Condition, Criteria, Consequence and Cause. In this document the four parts appear under plain labels. ‘What we found’ is the Condition. ‘What should apply’ is the Criteria. ‘Why it matters’ is the Consequence. ‘Why it happened’ is the Cause. ‘In short’ is a summary.
Asset	A thing, person or process that people, an organisation or the community value.
CASE	A format for writing risk statements: Consequence, Asset, Source and Event.
Consequence	The outcome of an event that affects objectives. It can be a loss, an injury, a disadvantage or a gain.
Control	A measure that changes risk. A control already exists. Compare with ‘treatment’.
Criticality	How much a system depends on a person, function, process, item or facility.
Event	An occurrence or change of a particular set of circumstances.
Firearm prohibition order	A court order that prohibits a person from acquiring, possessing or using a firearm.
Genuine reason	A purpose recognised by the Firearms Act 1996 for possessing or using a firearm, such as sport or target shooting, primary production or vertebrate pest control.
Hazard	A potential cause of harm in the environment or from non-deliberate actions.
Licensee	A person who holds a licence under the Firearms Act 1996 (ACT). This document uses ‘licensee’ for all licence holders.
Likelihood	The chance that something happens. In this assessment it is the chance of the event in the ACT in any one year.
National Firearms Register	The national system, due by mid-2028, that is to give police near real-time information on licences and firearms across borders.
Permit to acquire	A permit issued by the Registrar that authorises a licensee to acquire a specific firearm.
Registrar	The Registrar of Firearms, appointed under section 33 of the Firearms Act 1996 (ACT). The Registrar makes licensing decisions. The Registry is the office that supports the Registrar.
Risk	The effect of uncertainty on objectives.
Source	An element which alone or in combination has the potential to give rise to risk.
Threat	A potential cause of harm initiated by a deliberate action.
Threat Act	An act committed by a Threat Actor.
Threat Actor	A person or group that could cause harm on purpose.

TERM	DEFINITION
Treatment	A new or changed control that is proposed to reduce the likelihood or consequence of a risk.
Vulnerability	A weakness that can be exploited to cause harm to an asset.
Hazard: self-directed harm	The source label used for suicide (R1 and R5). It is rated as a hazard event, not by intent and capability.
Prescribed offence	An offence against the firearms law, or one that involves violence, drugs, alcohol or weapons, that carries more than one year in prison (section 18(2) of the Act).

ANNEX O

Assessor qualifications

JULIAN TALBOT, MRiskMgt, ASM, F.ISRM, FRMIA, GAICD, RSecP

Julian Talbot is an Australian risk management and security professional with more than 40 years of experience across approximately 50 industries and multiple international jurisdictions. He holds a Master of Risk Management from Monash University and has extensive experience in security risk assessment, enterprise risk management, regulatory compliance, governance and the evaluation of risk management frameworks.

His senior appointments include Chief Risk Officer at Aerosafe, Chief Executive Officer of Jakeman Business Solutions, Head of Security for the Australian Trade Commission's international network, and senior risk management advisory roles for the Australian Department of Defence and other government agencies.

Academic and Professional Credentials

- Master of Risk Management, Monash University.
- Fellow of the Risk Management Institution of Australasia (FRMIA).
- Fellow of the Institute of Strategic Risk Management (F.ISRM).
- Graduate of the Australian Institute of Company Directors (GAICD).
- Security Risk Management Certified Professional (SRMCP).
- Registered Security Professional (RSecP), accredited across five security disciplines.
- Certified Protection Professional (CPP).
- Certified Information Systems Security Professional (CISSP).
- Diploma of Security Risk Management.
- Certificate IV in Training and Assessment.
- Australian Security Medal (ASM).
- United Nations Advanced Enterprise Risk Management training.
- Australian Government NV2 security clearance.

Firearms Qualifications and Experience

Julian has more than 50 years of personal experience with firearms, beginning with rifle training in the Australian Air Training Corps in 1975, and approximately 40 years of experience involving civilian, military, security and competitive shooting.

His relevant experience includes:

- Completion of Category A and B firearms safety training and pistol safety training.
- Nationally accredited Category C and D firearms safety competencies (11029NAT).
- Patrol Commander in the Australian Army Reserve service with the Pilbara Regiment with training in military weaponcraft and field operations.
- Competitive IPSC pistol shooting since 1986, including representing the ACT at national championships.
- Experience on five continents with civilian, military, and security firearms, including firearms licensing, safe handling, operational procedures, and shooting range activities.

- Participation in original research into shooting range safety, including projectile containment and bullet-trap performance at the Majura shooting complex.

Publications and Specialist Research

Julian has authored numerous professional publications and over 20 books, including as lead author of the *Security Risk Management Body of Knowledge (SRMBOK)* and *Risk Management Body of Knowledge (RMBOK)*.

He is also the author of *The RMBOK Guide to Shooting Range Design, Certification and Operation: A Risk-Based Approach to Small Arms Ranges* (ISBN 979-8-1444-8107-6), scheduled for publication in November 2026. The book examines firearms safety, range design, projectile behaviour, human factors, regulatory requirements, risk controls, certification and safety assurance, drawing on international standards and original research.

Basis of Expertise

Julian's combination of postgraduate risk management qualifications, extensive professional security experience, military and civilian firearms training, competitive shooting experience and specialist research provides a substantial foundation for assessing the effectiveness, proportionality and adequacy of firearms licensing and regulatory controls in the ACT.

Julian has held a firearms licence in the Australian Capital Territory since 2021 and has served as an office holder on several sports shooting associations, including the Sporting Shooters Association of Australia ACT branch and IPSC Australia ACT branch.

His assessment applies structured, evidence-based risk management principles, including ISO 31000, to evaluate whether regulatory measures are appropriately designed, justified by evidence and effective in managing identified risks.

SRMBOK

Security Risk Management Body Of Knowledge

Firearms Licensing Risk Assessment

AUSTRALIAN CAPITAL TERRITORY

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