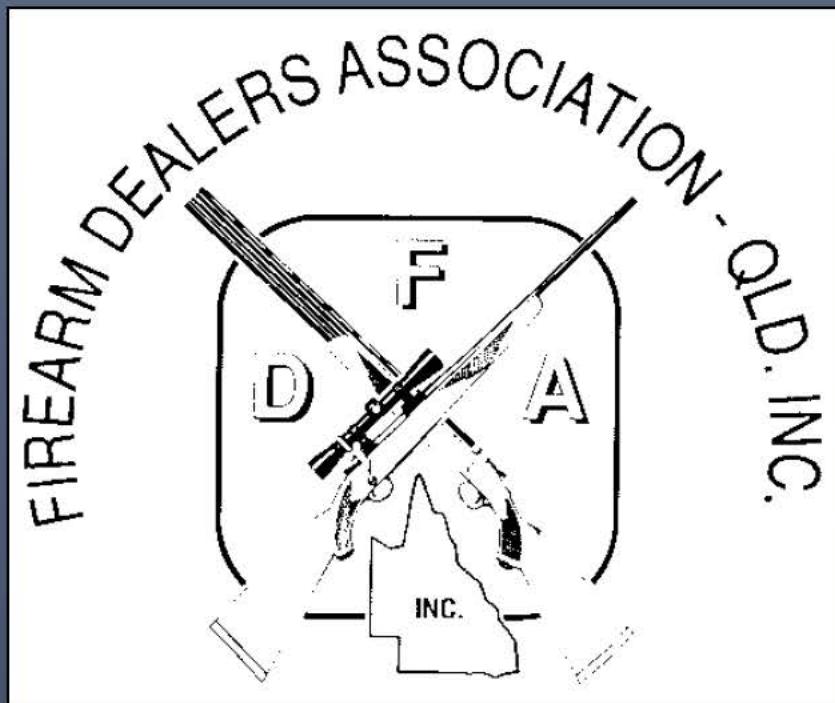


Fighting Antisemitism and Keeping Guns out of the Hands of Terrorists and Criminals Amendment Bill 2026

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SUBMISSION

Fighting Antisemitism and Keeping Guns out of the Hands of Terrorists and Criminals Amendment Bill 2026

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Executive Overview

The Firearms Dealers Association - Queensland Inc (FDAQ) represents licensed firearms dealers and armourers operating under the *Weapons Act 1990* throughout Queensland.

Licensed dealers are responsible for the lawful supply, secure storage, transfer and record keeping of firearms and related items. Dealers operate under strict compliance obligations and are subject to audit and inspection by the Weapons Licensing Group (WLG). They form a key regulated component of Queensland's firearms control framework.

FDAQ supports measures within the Bill that are clearly directed at:

- Criminal trafficking and unlawful supply;
- Illegal manufacture of firearms;
- Reckless or dangerous misuse;
- Preventing high-risk individuals from accessing firearms.

The Association's submission does not oppose those objectives. However, certain amendments have operational implications for licensed dealers and armourers. FDAQ's comments focus on ensuring that the reforms:

- Are clearly defined for industry participants;
- Do not create avoidable compliance uncertainty;
- Are supported by practical implementation guidance;
- Recognise lawful commercial and armourer activity.

This submission addresses:

1. The breadth of the proposed blueprint material offence in the context of licensed dealer and armourer operations;
2. Consideration of relevant history when assessing suitability for a licence or renewal.
3. Recommendation of review procedures.

The Role of Licensed Dealers

Licensed firearms dealers do not determine eligibility, assess suitability, or approve permits. Those functions sit with Weapons Licensing Group.

Dealers rely on:

- The validity of issued licences;
- Approved Permits to Acquire;
- Licence category and conditions as reflected in official systems.

In addition to processing lawful transactions, dealers are frequently approached by members of the public seeking advice regarding:

- Eligibility requirements;
- Licence categories;
- Storage obligations;
- Compliance responsibilities.

Accordingly, clarity in legislative amendments and supporting guidance is critical to ensuring that consistent and accurate information is provided to customers.

1. Blueprint Material Provisions

67B Defences for offences against s 67A

(1) It is a defence to an offence against section 67A for the person to prove that—

(a) the person did not know, and could not reasonably be expected to have known, that the person possessed or distributed the blueprint material; or

(b) the person possessed or distributed the blueprint material for use for a lawful purpose; or

Examples of possession or distribution for use for a lawful purpose—

• a person who holds a licence that authorises the person to manufacture a firearm possesses blueprint material for the manufacture of the firearm

*• a person who holds a licence that authorises the person to manufacture a firearm **distributes blueprint** material for the manufacture of the firearm to an employee who is involved in manufacturing the firearm*

There is no allowance for employees who do their own research and testing with 3D printed blueprints. It refers only to the person holding the license who

gives the employee a blueprint. An example is required to account for the reality of business procedures, such as:

Employees of a person who holds a licence that authorises the person to manufacture firearms engaging in their own research and development and accessing blueprint material for legitimate licensed purposes.

An allowance must also be made to acknowledge the common business practice where employees in the firearms industry work remotely on electronic devices.

This business practice does not involve manufacture, but rather research and access to blueprints where required as an integral task within the guidelines of their employment contract.

2. Expanded Suitability Assessment Considerations

10C Fit and proper person—licensed dealer's associate

(1) In deciding or considering, for the issue, renewal, suspension or revocation of a licence, whether a person is, or is no longer, a fit and proper person to hold a licence, an authorised officer **must** consider, among other things

The FDAQ suggests with the expansion of considerations in this section that the word **must** be changed to **may**.

This will allow an Authorised Officer to focus on the relevant matters that give weight and legal threshold to accurate decisions being made on fit and proper persons. It will not prevent the Authorised Officer from considering all information at his disposal but will ensure that the non-relevant history of an applicant or licensee client is not assessed through this process.

relevant offence means an offence, under a law of Queensland or another jurisdiction, that—

***(a) involves the carriage, discharge, possession, storage or use of a weapon; or
(b) involves the use or threatened use of violence; or
(c) involves the possession or distribution of blueprint material for the manufacture of a firearm on a 3D printer or an electronic milling machine.***

The above involves these matters being considered if they are

- a charge
- no conviction recorded or
- a withdrawn charge or
- a squashed charge or
- struck out charge
- spent charge

The Weapons Act is a complex piece of legislation. The firearms industry is often made aware of clients being charged with Weapons Act offences that are

subsequently withdrawn. Examples are readily available. FDAQ contends that the scope of the relevant offences needs to be taken into consideration to reduce the administrative burden on QPS and also ensure that withdrawn charges, presumably as a result of error or mitigating factors, are not applied to the consideration of the fit and proper status of a client who is otherwise totally compliant.

FDAQ recommends more robust wording around the definition of **relevant offence** in section (a) to ensure that compliant applicants are not forced to an already overburdened QCAT appeals process in response to an invalid licence refusal.

This robust structure and relevant application would also assist in reducing appeals to QCAT based on legislation that is ambiguous or lacking specificity.

Primary producers breaching impractical storage requirements which bear no relevance to the daily operation needs of their business most often receive the court's only option of **no conviction recorded** where there is no criminal intent in what amounts to a technical breach of storage conditions.

Similar outcomes result from primary producers crossing public roads through rural property with firearms in areas far removed from the possibility of public safety concerns.

FDAQ recommends a time limit of **10 years** as a relevant period on the provisions in (a) and (b) of the definition since the assessment specifically relates to consideration of:

- a charge
- no conviction recorded or
- a withdrawn charge or
- a squashed charge or
- struck out charge
- spent charge

FDAQ believes it is unreasonable that an applicant for a licence or renewal of licence should forever have consideration applied to charges where guilt was not proven or the charges were withdrawn. Any consideration period beyond 10 years without further incident should be ignored and removed from the legal threshold of assessment.

3. Implementation and Industry Communication

FDAQ has a representative available to attend the Committee hearing in Brisbane and requests an invitation to appear.

FDAQ requests that Government implement a review period that involves stakeholder feedback in relation to the new area of assessment to ensure that the legislation is being applied correctly and according to its stated intention.

Recommendations

The Firearms Dealers Association - Queensland Inc makes the following recommendations:

1. Clarification of Blueprint Material Provisions

Expressly confirm that licensed dealers, armourers, authorised manufacturers and employees in the firearms industry and acting within the scope of their licence or employment may lawfully possess and use technical drawings, schematics and digital files for legitimate commercial purposes.

2. Eligibility Changes

Allow the Authorised Officer to take into consideration the relevant previous history of an applicant by changing the word **must** to **may** in relation to the determination of fit and proper person status.

Limit the consideration of previous relevant history to a period of 10 years.

3. Review

Implement a review period that involves stakeholder feedback.

Conclusion

The Firearms Dealers Association Queensland supports measures within the Bill that are directed at criminal misuse, unlawful manufacture and high-risk individuals. Licensed firearms dealers operate within a highly regulated environment and are committed to maintaining compliance with Queensland law.

The Association remains available to engage constructively with the Queensland Government and Weapons Licensing Group to assist in the effective implementation of the Bill, including attendance at Committee hearings.