



»« Firearm Owners United »«

To,
Legal Affairs and Community Safety Committee
Parliament House
George Street
BRISBANE QLD 4000

I write to you today regarding the recent introduction of the **Weapons and Other Legislation (Firearms Offences) Amendment Bill 2019**. Our organisation has some serious concerns regarding certain aspects of this bill were it to be passed by parliament.

Our primary concern with this legislation is the prohibition of what are termed as 'digital blueprints' of firearms. The bill as drafted has a broad definition of what constitutes a digital blueprint, and this will undoubtedly capture activities of licensed shooters of a non-nefarious nature.

It is not uncommon for licensed shooters to hold digital files that detail the designs of firearms they own, where these files are often kept as part of assembly/break down documentation as well as for the measurement of critical tolerances to determine wear and serviceability.

It must be noted that the definition of a firearm in the Weapons Act includes major components of such, thus a drawing of a firing pin for example, when held in paper would be unregulated, but when scanned would become regulated. It is not uncommon for more obscure firearms for licensed shooters to measure and generate component drawings with the required specifications, then send those specifications to a licensed armourer to be manufactured. Were that shooter to then co-incidentally own an 'electronic milling machine' or '3d printer' that would be capable of making the part then they would commit an offence. Considering this would be irrespective of their intent to manufacture firearms or components illicitly, we feel this would be unjust.

Furthermore, we have been contacted by people involved in the industry who are currently entertaining the prospect of entering the market to produce firearms for civilian usage. Presently they do not possess an armourers license, and as such constrain themselves to activities they may legally undertake without such a license. However they intend when they have their designs ready for production to negotiate the red tape and substantial expense to obtain the required license to actually commence prototyping and production. This bill would criminalise their actions and force them into the untenable situation of destroying their existing design work, then obtaining an armourers license at significant expense before restarting the design process. Or as a workaround, they would have to move away from CAD software and design their projects on paper. Neither of these solutions would be economically viable.

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Our suggestion would be to scrap this aspect of the legislation completely, given that the NSW legislation on the matter (as referenced in the explanatory notes) has so far only been used to prosecute a young man for the production of regulated replica firearms for use in his costumes. Hardly a serious menace to public safety, and furthermore was adequately dealt with by the legislation regarding unlawful manufacture of regulated items.

The illicit manufacture of firearms is already adequately captured under the terms of the Weapons Act, and we do not believe that this change will be of any use in actually preventing the unlawful manufacture of firearms. The designs for firearms will remain readily available on the internet regardless of what occurs in Australia, and with technologies like VPNs and TOR the ability of law enforcement to monitor who downloads these files is borderline non-existent.

Our final suggestion on the matter, would be if the legislation were to be introduced the term 'digital blueprint' is significantly refined. Instead of capturing all digital drawings of firearms we would suggest that it instead capture computer code capable of being used in a machine for the production of a firearm.

CNC manufacturing machines universally do not accept random digital models or drawings and faithfully reproduce that design. Instead they must be programmed with code specific to that machine and manufacturing technology. This code is generically called G-code, for 3D printers it can be produced in a reasonably automated fashion using speciality programs; but for more advanced machine like lathes and mills it requires significant expertise in machining to produce usable code, even with the latest software tools.

Our second issue with the bill is the removal of protection for Dealers and Armourers against an effective license suspension when served with an FPO. , We do not believe that this is justified or required, and concerns regarding the activities of a licensee who strays outside of the law can be adequately dealt with through criminal charges and bail conditions.

Yours Faithfully,

Kirk Yatras
Vice President



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