

The Chair
Joint Standing Committee on Delegated Legislation
GPO Box: A 11
PERTH WA 6837



**Re: Inquiry into the Firearms Amendment Regulations 2013
(Increases in Firearms Licensing Fees)**

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I have recently become aware that firearms license fees in Western Australia were increased at short notice without consultation and just twelve months after the last increase in June 2012.

The table below sets out the new fees and the comparative fees in my home state of Queensland:

In effect the proposal is as follows:		Queensland
Original License	from \$159 to \$246	\$88
Annual Renewal	from \$46 to \$52	\$33
Noting Fee	from \$72 to \$170	\$29
(For an additional firearm)		

This is incredible charging regime for a recreational sport where the core business shouldn't be much more than an electronic database with limited 'expert' vetting. For example the inclusion of additional firearms once the original license is granted is a data entry following a compliance checklist – in effect an administrative function. And this is to cost the customer \$170! How can the cost structure of the WAPOL registry be so inefficient as to justify these price levels especially as they were reviewed just 12 months ago?

Having moved from Queensland just twelve months ago I am astonished as the over-regulation and inefficiency of the WA firearms system apart from its extreme cost. The cost points of obtaining a license involves first having to purchase an firearms (say \$1000) which is then held at dealers premises, installing a safe (\$500) then applying for license at a cost of \$246. This initial outlay is the best part of \$2,000 just to apply and the applicant is left in limbo if the application is refused for some reason. Not only is this counter-intuitive it must also increase the administrative workload upon the registry where most of the paperwork is done via the post office! This low level of automation is like stepping back in time!

This really begs the question about the efficiency and effectiveness of the whole system and rather than simplistically increasing fees you may be better off engaging a consultancy to understand why this process is so convoluted and expensive. In effect the connection between service cost and customer price seems weak and the price increase reads like a tax on sport.

So in summary, this level of fee increase is unjustified in such an inefficient and already expensive system. A proper review of the registry including options such as outsourcing, automation and the level of customer service needs to be considered before the simplistic option of radically increasing fees.

Regards

Ron Wynn

2 Sept 2013