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# Sporting Shooters Association of Australia (W.A.) Inc.

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20/12/19

Attn Maddison Evans  
Committee Clerk  
Standing Committee on Environment & Public Affairs  
Parliament House 4 harvest Terrace  
West Perth 6005

Dear Maddison

## **Submission to the WA Parliamentary Standing Committee on Police Licensing Enforcement Division**

On behalf of Western Australia's law-abiding sporting shooters, I thank you for the opportunity to present our views on the performance of the firearms Licensing Enforcement Division (LED). It is our strongly held view that LED are focused on an excessive regulatory compliance regime designed to limit the sporting use and ownership of firearms and not on acts of criminality or in the safety interests of the public. Their approach provides the illusion of action whilst punishing only the law abiding.

LED are widely viewed as promulgating firearms policy and de facto legislation through (misuse) of Regulations and without due regard to the role of the parliament. This "laws made by and for" the police situation is disingenuously justified on the basis of "public safety" when the vast majority of these actions relate to the unfair harassment of law-abiding shooters and the shooting sports.

One can only conjecture that the underlying policy objective is to reduce involvement in shooting sports and thereby reduce private ownership of firearms and is not public safety focused.

There is no evidential link between the number of legally owned firearms – or the type of firearms owned legally – and criminality. In fact, the overwhelming evidence shows the opposite with legal firearm ownership at all time high and firearm related homicides at an all-time low (and the rate is continuing to drop). Legal firearm owners are simply not a threat to public safety and never have been.

The Police Minister have gone on the record with public statements to the shooting community promising to wrest control back of public policy from the LED but there is no evidence that this has happened. Indeed certain individuals have become emboldened to attempt even more over reach.

Examples of LED use of regulation to hound and harass businesses and the shooting sports includes:

1. The arbitrary and indefensible decision by WAPOL to no longer recognise Australia Post as a "postal carriage service" and banning firearms carriage overnight which had a massive impact on the firearm dealer community and the cost of the sport. Its noted that WAPOL exempted themselves from the ban.
2. The ongoing vexatious attempts to shut down the Ella Valla Carnarvon long range shooting club. A club that attracts international tourism and is helping to build the local industry has been unfairly

targeted by LED in what can only be described as a “payback” campaign following a complaint made to the Police Integrity unit and the CCC about LED officers. By banning – at the stroke of a pen – the calibre of firearms used by the club and then harassing the club members LED demonstrate again that there is on punishing the sport and not on criminality.

3. The ongoing practice of refusal to issue an additional license to an existing holder even when the requirements under the Act and Regulations have been met. LED are notorious for rejecting compliant applications for seemingly “made up on the spot” reasons and providing no justification for these rejections that is supported by the Regulations. They are in effect daring the licence applicant to take them to the State Appeals Tribunal knowing this is often too confronting, particularly for older shooters. The rejection basis is usually spurious - often the shooter is told verbally to sell off some of their other firearms to “make room”. Intended to intimidate shooters into giving up a new purchase based on how a particular LED officer “feels”.
4. The arbitrary decision to ban “very powerful firearms” – those firearms used for ethically culling very large pest vertebrates or used in long range competition. There is no evidence that these types of firearms have ever been used in the commission of a crime in Western Australia so it can only be surmised that this new policy (implemented without consultation and in secret ) was a further punishment to those Ella Valla club members who spoke out about LED.
5. A senior LED officer engaging in deliberately misleading conduct in order to obtain SSAA training documents to be utilised in a court proceeding as part of the Ella Valla case, and then an internal police review of the complaint not being acted on.
6. Implementation of guidelines for rifle range operations and attempting to dictate the rules of our sport that are in direct contradiction to the advice provided to them. Development of the \$3M new Smallbore Olympic standard facility at Whiteman Park is stalled due to unworkable policies that WAPOL are attempting to impose as conditions for the facilities use. Western Australia has lost hosting opportunities for major events at great loss to the state as a result.

WAPOL Firearm Application Costs are the highest in Australia by a considerable margin and waiting periods are amongst the worst in the country. It beggar’s belief that a service that is so expensive and slow, is obstructionist and vexatious towards its customers is not being used to further a political agenda by unelected public servants.

They continue to display utter contempt for the role of the parliament through their subversion of the Regulation system to make de facto laws and they have publicly and repeatedly denigrated the role of the courts and State Appeals Tribunal and the legal officers who represent shooters.

I would urge the Committee to conduct further investigations to see the extent and impact that this ongoing undeclared campaign by LED has had on the shooting sports in WA. Speak to the operators of Ella Valla station and understand first-hand the unconscionable behaviour that has taken place.

From our membership we can furnish many more examples but hope that this summary gives you an overview of the type of issues that we are facing in our attempt to participate in our legal sport.

Yours Sincerely,

**Ron Bryant**  
**President**

**Sporting Shooters Association of Australia (WA) Inc.**

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