

Proposed Control of Weapons Regulations 2021

Statement of Reasons

On 13 August 2021 Department of Justice and Community Safety (**DJCS**) published the proposed Control of Weapons Regulations 2021 (**proposed Regulations**) and its associated Regulatory Impact Statement (**RIS**). The RIS and proposed Regulations were released for public consultation on the Engage Victoria website (engage.vic.gov.au) and notices were published in the Government Gazette and in the Herald Sun inviting public comments and submissions from 13 August 2021 until 16 September 2021.

In addition to these notices, DJCS directly contacted 59 stakeholder groups whose members benefit from an exemption under the *Control of Weapons Act 1990* and who had published contact information on their website.

All comments and submissions received have been considered and a response to each is summarised in this document.

During the period for public consultation 16 submissions were received in relation to the RIS and the proposed Regulations from—

- Animal Justice Party
- Antique & Historical Arms Collectors Guild of Victoria, Inc.
- Australasian Living History Federation
- Australian Gun Safety Alliance
- Australian Kendo Renmei Inc.
- Australian Knifemakers Guild Incorporated
- Fencing Clubs' Consortium

- Fencing Victoria
- Individual – confidential submission
- Kung Fu Wushu Victoria Inc
- Martial Arts Industry Association Limited
- Martial Arts Australia
- Military Historical Society of Australia, Geelong Branch Inc. & Geelong Military Re-enactment Group
- Modern Pentathlon Victoria
- Scots of Victoria Coordinating Group Inc.
- Sikh Interfaith Council of Victoria
- Victorian Kendo Renmei Inc.

Table 1 sets out a summary of each issue raised in the submissions, the response, and a statement of reasons for each.

A number of submissions expressed support for the proposed Regulations.

The *Control of Weapons Act 1994 (Act)* establishes a legislative scheme authorising statutory rules to prescribe body armour, controlled weapons and prohibited weapons.

A number of submissions requested certain articles or persons to be excluded from the description of **sword** listed in item 47 of Schedule 2 to the proposed Regulations, or for permits or exemptions for classes of person or classes of weapon to be inserted into the proposed Regulations.

If an article were to be excluded from the description of **sword** in Schedule 2 to the proposed Regulations, it would be excluded from all restrictions applying to prohibited weapons within the Act.

The Act provides for a weapon to be included or excluded from the Regulations, but not for a regulation that exempts a class of person or weapon from one or more of the requirements of the Act, or to attach a condition to any use of a weapon.

Because there is no regulation making power authorising a regulation to exempt a class of person or weapon from one or more of the requirements of the Act, there is no less restrictive means reasonably available to achieve the policy objective other than to include or exclude an article in the items listed as a controlled weapon or a prohibited weapon in the proposed Regulations, and to rely on appropriately drafted exemptions or approvals with relevant conditions.

The Act provides for exemptions to be granted by the Governor in Council under section 8B of the Act, and for approvals to be given by the Chief Commissioner of Police under section 8C of the Act, and for exemptions and approvals to be subject to conditions.

No submissions were received directly addressing regulations prescribing body armour, controlled weapons, application fees and search records.

Having considered each of the submissions in detail no further changes to the proposed Regulations are proposed at this time. However, DJCS will review and consider the adequacy of current exemptions applying to a number of articles prescribed as prohibited weapons after the Minister takes a decision in relation to the proposed Regulations.

Out of scope matters – Exemptions and approvals

A large number of submissions raised matters relating to the operation of exemptions granted by the Governor in Council under section 8B of the *Control of Weapons Act 1990*.

As these matters fall outside the scope of the review of the proposed Regulations and its RIS, a detailed response to those matters is not included in this document. However, DJCS will review and consider the adequacy of current exemptions relating to the following matters—

- Amateur radio operators;
- Laser Tag and Other Laser Sports devices;
- Swords, including dirks, fencing sport weapons, imitation swords, the Kirpan, martial arts weapons, and military weapons.

Out of scope matters – legislative reform and other proposals

Certain submissions also requested legislative reform or reforms to government administration. These matters fall outside the scope of the review of the proposed Regulations and the associated RIS.

Table 1 – summary of matters raised in submissions to the Regulatory Impact Statement and response

Subject matter	Comment / Matter raised	Response
General		
General	A number of stakeholders expressed general support for the proposed Regulations.	Noted
Adequacy of preliminary consultation and early stakeholder engagement	Certain stakeholders expressed concern that they had not been directly approached for input during the preliminary consultation stage of the sunset review; that those affected indirectly by regulations should be engaged; and that stakeholders are not limited to those with a commercial interest in regulation.	<p>Noted</p> <p>DJCS engaged consultants to directly approach stakeholders from each of the sectors of the public known to be affected by the proposed Regulations during the preliminary consultation phase. This included representatives from weapons collector groups, military and historical re-enactment groups, weapons manufacturers, weapons retailers, armourers to film and television, and martial arts and other sports bodies.</p> <p>A notice inviting submissions was published in the Herald Sun and in the Government Gazette on 13 August 2021 in accordance with the requirements of the <i>Subordinate Legislation Act 1994</i>. Public comments and submissions were invited for a 34 day period via the Engage Victoria website.</p> <p>In addition to the public notices, DJCS directly contacted 59 stakeholder groups whose members benefit from an exemption under the <i>Control of Weapons Act 1990</i> and who had published contact information on their website.</p> <p>All comments and submissions received have been considered and a response to each is set out in this document.</p>

Subject matter	Comment / Matter raised	Response
Adequacy of economic analysis	Certain stakeholders expressed concern with the quality of the analysis of the evidence relied on demonstrating weapons-related harm and objected to the proposition that allowing legitimate uses of prohibited weapons is secondary to reducing weapons-related harm.	<p>Noted.</p> <p>The regulatory impact statement has been independently assessed by the Commissioner for Better Regulation.</p> <p>The Commissioner for Better Regulation issued a certificate on 26 July 2021 certifying that the regulatory impact statement meets the adequacy requirements set out in the <i>Subordinate Legislation Act 1994</i>.</p>
Regulation 8 and Schedule 2 – Prohibited weapons		
Bows and crossbows	Bows and crossbows should be subject to the same stringent regulations and should be only accessible for the purposes of ‘collecting’ not hunting.	<p>No change</p> <p>Bows are not currently prescribed as a controlled weapon or a prohibited weapon because they do not present the same level of risk as a crossbow – which can be discharged in a manner similar to a firearm.</p> <p>The <i>Control of Weapons Act 1990</i> regulates access to and use of prohibited weapons. Prohibiting hunting with bows and crossbows would be inconsistent with the regulatory scheme.</p>
Gel blasters	Request that gel blasters should be listed and described as a prohibited weapon.	<p>Supported in principle, no change required</p> <p>The <i>Control of Weapons Act 1990</i> provides that an imitation firearm is a prohibited weapon.</p> <p>A gel blaster is a prohibited weapon if it is an imitation firearm as defined in section 3(1) of the Act.</p> <p>The relevant definitions in section 3(1) of the Act are—</p>

Subject matter	Comment / Matter raised	Response
		<p>prohibited weapon means an imitation firearm or an article that is prescribed by the regulations to be a prohibited weapon;</p> <p>imitation firearm means a device—</p> <ul style="list-style-type: none"> (a) the appearance of which could reasonably be mistaken for that of an operable firearm; but (b) which is not designed or adapted to discharge shot or a bullet or other missile by the expansion of gases produced in the device by the ignition of strongly combustible materials or by compressed air or other gases, whether stored in the device in pressurised containers or produced in the device by mechanical means and is not capable of being made to do so.
Kirpans	<p>Request that description of sword be modified to exclude a <i>Kirpan</i>, which is an article of faith used for the purposes of performing religious duties by a Sikh.</p> <p>Submission says that the proposed Regulations infringe the right of freedom of religious belief and practice for Victorians of Sikh faith.</p> <p>The Kirpan is a curved iron or steel blade with a handle. It must be kept in a protective scabbard and held in a cloth holster (a Gatra) on the initiated Sikh person’s body. It is not a sword,</p>	<p>Noted, no change to Regulations.</p> <p>DJCS acknowledges that the Kirpan has a special significance to the Sikh, and in the context of the Sikh faith the kirpan is not a sword, dagger or knife, and must never be used in aggression.</p> <p>However, sword is listed and described broadly in item 47 of Schedule 2 to the proposed Regulations and captures many different articles regardless of the construction of the blade or the hilt or handle. The description of the Kirpan provided appears to fall within the description of</p>

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	<p>dagger or knife and is worn only by an initiated Sikh. The Kirpan holds a very prominent position in the Sikh faith, as a symbol of spiritual and temporal power and the duty upon the Sikh person to resist oppression upon anyone. It is the symbol of sovereignty and dignity.</p> <p>When understood in its proper context, the Kirpan cannot be considered a weapon of the type intended to be prohibited and controlled by the Act. Any attempt to describe it using terms such as a 'knife', 'sword' or 'dagger' become wholly misleading and derogatory.</p> <p>The balance of public interest of safety and right of individual to practice faith is struck by way of the vigorous inculcation and formal initiation processes that (by necessity) takes place prior to a Sikh person being deemed fit to have a Kirpan.</p> <p>The Proposed Regulations impose a discriminatory financial and procedural burden upon Sikhs by requiring the maintenance of a register of sales of Kirpans which ultimately imposes on the freedom to practice the religion without discrimination. There is no other religion which is required to register its members details when they purchase a legitimate article of faith.</p> <p>The indirectly discriminatory treatment of the Kirpan offends, insults, humiliates and intimidates Sikh (and arguably non-Sikh) Victorians</p>	<p>the article listed and described as sword in item 47 of Schedule 2 to the proposed Regulations.</p> <p>Prescribing an article in Schedule 2 to the proposed Regulations is intended to attract the operation of the statutory scheme applying to prohibited weapons. The nomenclature is not intended to impugn any particular article, instead it serves to regulate that article and articles within that class.</p> <p>Since the introduction of the <i>Control of Weapons Act 1994</i> the Victorian Government has recognised the right of Sikhs to carry the Kirpan as part of their traditional culture and religion. For this reason, exemptions have applied to Sikhs so that the freedom to practice religion is not unreasonably limited.</p> <p>The <i>Control of Weapons Act 1994</i> establishes a legislative scheme authorising statutory rules to prescribe body armour, controlled weapons and prohibited weapons. The Act provides for a weapon to be included or excluded from the Regulations, but not for a regulation that exempts a class of person or weapon from one or more of the requirements of the Act.</p> <p>The Act provides for exemptions to be granted by the Governor in Council and for approvals to be granted by the Chief Commissioner of Police, subject to any conditions imposed by the Governor in Council or the Chief Commissioner of Police.</p> <p>If the Kirpan were to be excluded from the description of sword in the proposed Regulations, it would be excluded from that description for all Victorians. The protective</p>

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	<p>rendering the Proposed Regulations and Regime as a whole discriminatory and contrary to law.</p>	<p>elements associated with vigorous inculcation and formal initiation processes that take place before a Sikh is deemed fit to have a Kirpan would not apply to Victorians who do not share the Sikh faith.</p> <p>Because there is no regulation making power authorising a regulation to exempt a class of person or weapon from one or more of the requirements of the Act, there is no less restrictive means reasonably available to achieve the policy objective.</p> <p>The relevant statutory tool to authorise the possession, carry, use etc of an article listed and described in Schedule 2 to the proposed Regulations is an exemption granted by the Governor in Council or an approval given by the Chief Commissioner of Police.</p> <p>Broad exemptions are in place and continue to apply to Sikhs in relation to the Kirpan.</p> <p>DJCS will consider the exemptions currently applying to Sikhs in relation to the Kirpan to examine the adequacy of current exemptions after the Minister takes a decision in relation to the proposed Regulations.</p> <p>DJCS acknowledges the feelings expressed by the Sikh community regarding the requirement to keep a record of sales of the Kirpan. It is a requirement of the <i>Control of Weapons Act 1990</i> that a person purchasing any article listed or described in Schedule 2 of the proposed Regulations must produce evidence as to their identity, and that a record of sale must be kept for three years after the sale.</p>

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		<p>The identification and record keeping requirements fall equally on Sikhs as on every other person with an exemption or approval to purchase an article listed or described in Schedule 2 to the proposed Regulations for cultural, religious or ceremonial reasons.</p>
<p>Martial arts weapons</p>	<p>Request that exemptions for certain martial arts weapons be inserted in the proposed Regulations.</p> <ul style="list-style-type: none"> • balisong (Butterfly knife) • dagger, including but not limited to ring knives • double end knives • throwing blade • a mace • a flail 	<p>Supported in principle, no change required</p> <p>The <i>Control of Weapons Act 1994</i> establishes a scheme authorising statutory rules to prescribe body armour, controlled weapons and prohibited weapons. The Act provides for a weapon to be included or excluded from the Regulations, but not for a regulation that exempts a class of person or weapon from one or more of the requirements of the Act.</p> <p>The Act provides for exemptions to be granted by the Governor in Council and for approvals to be granted by the Chief Commissioner of Police, subject to any conditions imposed by the Governor in Council or the Chief Commissioner of Police.</p> <p>The following articles are listed or described as prohibited weapons in Schedule 2 to the proposed Regulations—</p> <ul style="list-style-type: none"> • item 2 - a <i>dagger</i>; • item 5 - a <i>butterfly knife</i>; • item 6 - a <i>double-end knife</i>; • item 10 - a <i>throwing blade</i>; • item 29 - a <i>mace</i>; • item 30 - a <i>flail</i>.

Subject matter	Comment / Matter raised	Response
		<p>Exemptions currently apply to authorise the possession, use etc of each of these articles in certain circumstances.</p> <p>DJCS will consider the exemptions currently applying to martial arts weapons to examine the adequacy of current exemptions after the Minister takes a decision in relation to the proposed Regulations.</p>
	<p>Submission requested that additional Chinese weapons should be listed as prohibited weapons, and that these weapons should be subject to specific exemptions.</p> <p>The additional weapons requested to be listed or described as a prohibited weapon include—</p> <ul style="list-style-type: none"> • Quan Dao (Kwan Do) – a type of halberd • Pu Dao – a Chinese single-edged infantry weapon 	<p>No change required</p> <p>The Chinese martial arts weapons described appear to fall within the description of sword, which is listed and described as a prohibited weapon at item 47 of Schedule 2 to the proposed Regulations.</p> <p>DJCS will consider the exemptions currently applying to martial arts weapons to consider the adequacy of current exemptions after the Minister takes a decision in relation to the proposed Regulations.</p>
Swords	<p>Request that description of sword be modified to exclude "fencing sport weapons" from the regulatory scheme.</p> <ul style="list-style-type: none"> • Fencing sport weapons are fundamentally safe articles of sporting equipment • Prohibition of sale of fencing sport weapons to a person under 18 years of age makes it impossible for parents of child participants to comply. • Current Exemption Order extends to participants only, and does not allow non-participating parents or teachers to 	<p>Noted, no change to the Regulations required</p> <p>Sword is listed and described broadly in item 47 of Schedule 2 to the proposed Regulations. The description is broadly drafted to capture all types of swords, regardless of the construction of the blade or the hilt or handle.</p> <p>The <i>Control of Weapons Act 1994</i> establishes a statutory scheme authorising statutory rules to prescribe body armour, controlled weapons and prohibited weapons. The Act provides for a weapon to be included or excluded from the Regulations, but not for a regulation that exempts a</p>

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	<p>purchase, transport or store fencing sport weapons for children or student,</p> <ul style="list-style-type: none"> • Conditions on current exemption impose an untenable burden on all participants, putting all participants at risk of criminal prosecution through inadvertent non-compliance • Classifying fencing weapons as prohibited weapons casts our sport in a negative light and is damaging to the good reputation of the sport. 	<p>class of person or weapon from one or more of the requirements of the Act.</p> <p>The Act provides for exemptions to be granted by the Governor in Council and for approvals to be granted by the Chief Commissioner of Police, subject to any conditions imposed by the Governor in Council or the Chief Commissioner of Police. The Act does not authorise regulations imposing conditions in relation to an item prescribed as a controlled weapon or a prohibited weapon.</p> <p>Exemptions currently apply to authorise the possession, use etc of fencing sport weapons (swords) in the sport of fencing.</p> <p>DJCS will consider the exemptions currently applying to swords to examine the adequacy of current exemptions after the Minister takes a decision in relation to the proposed Regulations.</p> <p>Classification of an article as a prohibited weapon attracts the operation of the statutory scheme applying to prohibited weapons. The nomenclature is not intended to impugn any particular article, instead it serves to regulate that article.</p> <p>The broad description of sword works with the exemptions and approvals powers to balance the public interest in limiting the risk of weapons related harms with the public interest in the safe and legitimate uses of those weapons.</p> <p>The exemptions applying to swords require a person in possession of a sword to be stored safely and securely</p>

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		<p>when not in use for the purposes for which the exemption was granted.</p> <p>Despite the construction of fencing sport weapons, swords such as fencing sport weapons continue to present the risk of public alarm if possessed, used, or carried other than in accordance with these conditions.</p> <p>As the Act does not authorise regulations imposing conditions in relation to an item prescribed as a controlled weapon or a prohibited weapon, the most appropriate regulatory measure is to describe a sword broadly, and to provide for exemptions and approvals with appropriate conditions that address the residual risk of weapons-related harms arising from the exempt or approved conduct.</p>
	<p>Regulation of swords in Victoria is inconsistent with other jurisdictions. Compliance difficulty for interstate training and competition.</p>	<p>Noted, no change to Regulations required</p> <p>The proposed Regulations prescribe matters for the purposes of the <i>Control of Weapons Act 1990</i>. There is no regulation making power to modify the regulation of any article that is prescribed as a prohibited weapon or a controlled weapon.</p> <p>DJCS will consider the exemptions currently applying to swords to examine the adequacy of current exemptions after the Minister takes a decision in relation to the proposed Regulations.</p>
	<p>Request that the description of sword be modified to exclude swords with a blunt edge, including imitation swords such as "iaito" with a blade constructed of a cast metal alloy.</p>	<p>Noted, no change</p> <p>Sword is listed and described broadly in item 47 of Schedule 2 to the proposed Regulations. The description is broadly drafted to capture all types of swords,</p>

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		<p>regardless of the construction of the blade or the hilt or handle.</p> <p>The <i>Control of Weapons Act 1994</i> establishes a scheme authorising statutory rules to prescribe body armour, controlled weapons and prohibited weapons. The Act provides for a weapon to be included or excluded from the Regulations, but not for exemptions or permits.</p> <p>The Act provides for exemptions to be granted by the Governor in Council, and for approvals to be granted by the Chief Commissioner of Police.</p> <p>A broad range of exemptions apply to a large number uses and users of articles meeting the description of sword in item 47 of Schedule 2 to the proposed Regulations.</p> <p>DJCS will consider the exemptions currently applying to swords to examine the adequacy of current exemptions after the Minister takes a decision in relation to the proposed Regulations.</p>
Regulation 9 – Identification		
	Request for more consistent identification requirements across government	<p>Support in principle, no change to Regulations required.</p> <p>The Service Victoria Identity Verification Standards were considered when preparing the proposed Regulations.</p> <p>As a consequence, the list of identity documents that may be produced as evidence of identity was expanded to include an immigration or identity document issued by the Commonwealth that includes the date of birth, a</p>

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		<p>photograph and the name or former name of the individual. This change will enable certain visa holders who don't have and can't obtain a passport recognised by the Australian Government to demonstrate their identity for the purposes of the Act.</p>
<p>Regulation 10 – Recording sales of prohibited weapons</p>		
	<p>A submission was received asking about the need to regulate the security of required records.</p> <p>The security of a bound record book, or a computerised system should be considered to ensure that the personal details of someone purchasing these articles is protected.</p>	<p>Noted, no change to the Regulations required.</p> <p>The proposed Regulations prescribe the form and information that must be kept for 3 years under the <i>Control of Weapons Act 1990</i>. There is no regulation making power authorising a regulation to prescribe security requirements for the storage of those records.</p> <p>Requirements to ensure the security of information may be imposed by the Australian Privacy Principles in the Privacy Act 1988 of the Commonwealth. Further information on the operation of this Commonwealth legislation is available at www.oaic.gov.au/privacy/.</p>
<p>Out of scope matters – Exemptions</p>		
<p>Amateur radio operators</p>	<p>Request for certainty on the operation of an exemption relating to slingshots used by amateur radio operators.</p>	<p>Support in principle, no change to Regulations required</p> <p>An exemption applies in relation to slingshots for amateur radio operators.</p> <p>The exemption was dated 19 December 1989 and published at page 1038 of Government Gazette No. G 14 on Wednesday 4 April 1990.</p>

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		<p>The Exemption continues to apply by operation of paragraph 13(3)(a) of the <i>Control of Weapons Act 1990</i>, which provides that, despite the repeal of the <i>Prescribed Weapons Act 1989</i>, any exemption in force under section 31A of the <i>Firearms and Other Weapons Act 1958</i> immediately before the repeal continues in force until the date specified in that exemption or, if no date is specified, until revoked by an exemption made under section 8B of the <i>Control of Weapons Act 1990</i>.</p> <p>An order under section 8B of the <i>Control of Weapons Act 1990</i> revoking the exemption dated 19 December 1989 has not been made to date.</p> <p>DJCS will examine the exemption currently applying to amateur radio operators to consider the adequacy of current exemptions after the Minister takes a decision in relation to the proposed Regulations.</p>
Chinese martial arts weapons	Request to review exemptions relating to martial arts weapons, including imitation swords, halberds and traditional Chinese weapons commonly used in Kung Fu Wushu clubs.	<p>Support in principle, no change to Regulations required</p> <p>DJCS will examine the exemptions currently applying to martial arts weapons to consider the adequacy of the exemptions currently in place after the Minister takes a decision in relation to the proposed Regulations.</p>
	Uncertainty about extent of exemptions and application to traditional Chinese weapons used in competition restricts access to Victoria athletes.	<p>Support in principle, no change to Regulations required</p> <p>DJCS will examine the exemptions currently applying to martial arts weapons to consider the adequacy of current exemptions in place after the Minister takes a decision in relation to the proposed Regulations..</p>

Subject matter	Comment / Matter raised	Response
Inert ammunition	Request for exemption to possess, carry and display inert ammunition for purposes of military re-enactment or public educational displays.	<p>No change to Regulations required</p> <p>The <i>Control of Weapons Act 1990</i> does not confer a regulation making power to regulate ammunition.</p> <p>The <i>Firearms Act 1996</i> provides for the licensing and regulation of firearms and ammunition. This includes licenses for firearms collectors, heirlooms licenses and firearms ammunition collectors licenses.</p>
Laser Tag and Other Laser Sports devices	Request that exemption order applying to Laser Tag and Other Laser Sport devices be aligned with the minimum age for junior firearms licence (12 years) to promote respect for imitation firearms.	<p>No change to Regulations required</p> <p>DJCS will examine the exemptions currently applying to Laser Tag and Other Laser Sports devices to consider the adequacy of current exemptions in place after the Minister takes a decision in relation to the proposed Regulations.</p>
Military weapons	<p>Request for review of exemptions for military weapons commonly used for re-enactment or public educational displays, including—</p> <ul style="list-style-type: none"> • flick knives (item 1 in Schedule 2); • daggers (item 2 in Schedule 2); • trench knives (item 9 in Schedule 2); and • maces (item 29 in Schedule 2). 	<p>Support in principle, no change to Regulations required</p> <p>Re-enactment groups with exemptions for swords may possess and use daggers in their re-enactments under a Governor in Council exemption relating to daggers gazetted on 5 June 2014.</p> <p>DJCS will examine the exemptions currently applying to military weapons to consider the adequacy of current exemptions in place after the Minister takes a decision in relation to the proposed Regulations.</p>
Swords	<p>Multiple requests for review of general exemption to possess Swords of various types and for various purposes. This included—</p> <ul style="list-style-type: none"> • Chinese martial arts weapons; • dirks; 	<p>Support in principle, no change to Regulations required</p> <p>DJCS will examine the exemptions currently applying to swords to consider the adequacy of current exemptions in</p>

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	<ul style="list-style-type: none"> • fencing sports weapons; • imitation swords; • martial arts weapons; • military weapons; • Scottish organisations affiliated with currently exempt Scottish organisations (Clans, Caledonian and Societies, etc). 	<p>place after the Minister takes a decision in relation to the proposed Regulations.</p>
<i>Out of scope matters – legislative reform and other matters</i>		
<p>Requests for legislative reform</p>	<p>A number of requests for legislative reform were received. These included proposals to—</p> <ul style="list-style-type: none"> • establish a permit scheme to authorise the use of Chinese martial arts weapons; • establish a national register of convicted perpetrators of domestic and family violence and animal cruelty; • impose further restrictions to prevent guns being used for violent crime and in family and domestic violence situations; • ensure legislation governing access to other weapons is stringent and in line with legislation governing access and use of firearms; • apply the same licensing and compliance requirements to bows and crossbows as are applied to firearms; • ban bow and crossbow hunting; • ban all bows and crossbows; • strengthen laws and regulations; 	<p>No change</p> <p>Proposal requires legislative reform that is beyond the scope of the proposed Regulations.</p>

Subject matter	Comment / Matter raised	Response
	<ul style="list-style-type: none"> • limit all weapons and hunting; • ensure the integrity and incorruptibility of regulatory bodies; • ensure categories of weapons such as ‘prohibited weapons’ remain in legislation; • explore the concept of a ‘negative licence’ and how this could work as part of an increased regulatory framework (not instead of); • ensure regulatory activities are conducted and monitored by an independent or government body; • increase the level of regulation regarding access to, and use of weapons 	
<p>Recommendations on approach to government administration</p>	<p>A number of requests relating to government administration were received. These included proposals to—</p> <ul style="list-style-type: none"> • run public education campaigns highlighting the social and environmental harm caused by use of weapons; • investigate social and socio-economic circumstances which contribute to misuse of weapons and develop strategies to address these causes; • ensure regulatory activities are conducted and monitored by an independent or government body; • task the national Firearms and Weapons Policy Working Group to streamline the 	<p>No change</p> <p>Proposal addresses matter of government administration and is beyond the scope of the proposed Regulations.</p>

Subject matter	Comment / Matter raised	Response
	articles prescribed as controlled and prohibited weapons.	
