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\*Please quote in response\*

Mrs Oly Carlson MLA  
Chair  
Legislative Scrutiny Committee  
GPO Box 3721  
DARWIN NT 0801

Via email: [LSC@nt.gov.au](mailto:LSC@nt.gov.au)

Dear Mrs Carlson MLA,

Thank you for your letter dated 7 April 2026, regarding the Inquiry into the Firearms Amendment Bill 2026 (Serial 61) ('the Bill').

The Northern Territory Police Force ('NTPF') is grateful for the opportunity and offers the following in response to the Legislative Scrutiny Committee's questions at **Attachment A**.

Yours sincerely

A handwritten signature in black ink, appearing to be 'MD', is written over a light blue circular background.

Martin Dole APM  
Commissioner of Police

14 April 2026

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***Conditions of a Licence or Permit***

1. Submitters were generally supportive of empowering the Commissioner to revoke, vary or add conditions to a licence or permit during the life of the licence or permit. However, it was noted that this new power should be 'exercised within clear thresholds and should be supported by procedural safeguards to ensure consistency, transparency and accountability.'
  - a. *Can you clarify for the Committee what types of circumstances would trigger a revocation, variation or addition of conditions to a licence or permit?*
  - b. *Will the Commissioner be able to exercise their discretion on the basis of an application by the holder of the licence or permit?*
  - c. *Can you explain why the Bill does not incorporate clear grounds for the exercise of the Commissioner's discretion, such as: public safety risk; demonstrated compliance failure; integrity concerns; material change of circumstance; or operational necessity such as changes to the Act or Regulations?*
  - d. *Was any consideration given to including a note in the Bill or the Explanatory Statement to provide examples of grounds for the exercise of the Commissioner's discretion, If not, why?*

Question 1

Clauses 6 and 8 of the Bill amends the Commissioner's discretionary power to revoke, vary or add conditions to a licence or permit during its currency. These amendments will enhance the safety of the community by ensuring that the most appropriate conditions are in place for licence and permit holders.

The grounds for exercising this power will vary greatly depending on the circumstances of the individual's licence or permit. Therefore, each licence and permit must be assessed on a case-by-case basis to ensure that the conditions imposed are the most appropriate. For example, the Commissioner may exercise the power as a result of a compliance check following an intelligence report or a complaint, or where there may be concerns regarding continued suitability to hold a licence or permit. The power may also be exercised to remediate bespoke conditions of a licence or permit holder, such as medical conditions and storage arrangements.

While not expressly required by the Bill, internal NTPF policies and procedures will detail the process for revoking, varying and adding conditions to a licence or permit.

The inclusion of a note in the Bill and examples in the Explanatory Statement was considered. However, were not included as the power is inherently discretionary.

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2. Given that changes to a licence or permit may adversely affect the licence/permit holder's business operations, employment eligibility, storage obligations, security contracts or client deliverables, submitters expressed the view that, in addition to the appeal provisions set out in section 18, the proposed amendment should incorporate natural justice provisions as part of the decision-making process.
- a. *Was any consultation undertaken to assess the potential adverse impact of the proposed amendment on business related licence/permit holders and associated employees in particular? If not, why?*
  - b. *What consideration was given to the FAC's proposal to require the Commissioner to advise licence/permit holders of any proposed changes and their purpose, allow them 14 days to respond, and take their submission into account before making a determination to either change their licence, or not proceed with the proposed change?*

Question 2

Due to the truncated timeline of the Bill, formal consultation was not undertaken.

Consideration was given to the Firearms Advisory Council's ('FAC') 14 day right of reply proposal. However, it was not incorporated as it would create inconsistencies with the operation of the Act. For example, as the regulator, the NTPF must act promptly to provide for the regulation and control of firearms. The safety and protection of licence and permit holders and the community is paramount. The inclusion of any right of reply period would impede the regulator's function.

The Bill provides the same review process as set out in the Act. This process affords all firearms licence and permit holders with natural justice by way of administrative review. Therefore, decisions relating to the imposition or variation of firearms licence or permit conditions will be reviewable decisions by the Northern Territory Civil and Administrative Tribunal ('NCTCAT').

*Period of a Licence*

3. While supporting the proposed amendment to extend corporate and employee licences to 10 years, the Shooting Industry Foundation Australia (SIFA) queried why other business-related licences remain at 5 years.
- a. *What types of entities or business operations do corporate licences encompass?*
  - b. *What is the rationale for increasing the licence period for corporate and employee licences?*
  - c. *Can you clarify for the committee why licences for other commercial enterprises, such as paintball operators and associated employees for example, remain at 5 years.*

Question 3

Clause 7 of the Bill formalises Recommendation 5A of the Approvals Fast Track Taskforce Report. This is achieved by amending section 14(1) of the Act to extend the period of a firearms corporate

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licence and firearms employee licence from 5 years to 10 years (or a shorter period if specified in the licence). This amendment gives effect to existing NT Government commitments relating to the accepted recommendations of the Approvals Fast Track Taskforce Report.

The rationale for increasing the period of a firearms corporate licence and firearms employee licence was determined by Recommendation 5 of the Approval Fast Track Taskforce Report which sought to '[e]xtend licence renewal periods to reduce unnecessary touchpoints with government'. This recommendation included a specific Tranche 1 reform proposal for the NTPF namely "5A. That NT Government should, as part of implementing the National Firearms Register, work with industry to identify options to allow renewal of commercial (Corporate and Employee) Firearm Licences".

The Approvals Fast Track Taskforce Report also highlighted that:

- i. The lack of renewal opportunities for commercial firearms licences can cause delays for businesses in the Agriculture and Aquaculture sector; and,
- ii. The Act could provide an option to extend corporate and employee licence renewal periods for a further five years. This will lessen the administrative burden and time delays. Longer licence periods will also provide increased business certainty. This reform should be considered as part of the Government's implementation of the National Firearms Register ('NFR').

The Approvals Fast Track Taskforce Report specifically addressed the Agriculture and Aquaculture sector. Other firearms licence types were not within the scope of the Approvals Fast Track Taskforce Report.

4. **Proposed subsection 14(4) allows for a licence to continue to be in force beyond its expiry, as long as an application for a new firearm licence of the same type has been lodged before expiry of the existing licence, and that licence application has not yet been granted or refused, and the existing licence has not been revoked.**

- a. ***Can you explain why the proposed amendment is required?***

Question 4

New subsections 14(4) and (5) introduce the ability for a licence to remain valid whilst an application for the same licence type is being considered by the Commissioner. This amendment essentially enables licence holders to continue to possess and use their firearm, as authorised, after the expiry of their licence with no disruptions until their new licence is granted. It also supports Recommendation 5A of the Approvals Fast Track Taskforce Report by ensuring business certainty, namely in the Agriculture and Aquaculture sector.

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5. **Sam Wilks raised concerns that, in the absence of appropriate documentation, proposed subsection 14(4) could create real and foreseeable disputes in relation to employment and contractor compliance; audits and site-access approvals, corporate security engagements; and insurance disclosure and indemnity matters for example.**
- a. ***Where a licence continues in force subject to subsection 14(4), what, if any, documentation will the licence holder receive as proof of currency?***
  - b. ***During development of the Bill, what consideration was given to the likelihood of potential disputes regarding the currency of a licence arising as a consequence of the proposed amendment?***

Question 5

The Firearms Policy and Recording Unit ('FPRU') will, following receipt of the application, provide the licence holder with confirmation of lodgement of their application for the same type of licence. This confirmation will provide the licence holder with proof of currency until the new licence is granted.

During the development of the Bill, consideration was given to the future state following the implementation of these amendments. A Licence and Permit Verification Service ('LPVS') will be developed and delivered as part of the NFR. The LPVS will enable the validity and status of a licence or permit to be checked during real time.

6. **It has been suggested that the Firearms legislation should incorporate statutory processing timeframes for licence applications which sets a limit on how long a licence can continue in force under subsection 14(4).**
- a. ***Has any consideration been given to establishing a statutory processing timeframe for licence applications? If not, why?***
  - b. ***Was any consideration given to determining a limit on how long a licence can continue in force following expiry? If not, why?***

Question 6

New subsection 14(5) sets out the circumstances for when a licence continued in force under new subsections 14(4) expires.

Processing timeframes are subject to the volume of applications and operational availability. For this reason, a statutory processing timeframe is not suitable.

As previously mentioned, the Bill sets the parameters for how long a licence can continue in force beyond its expiry under new section 14(4). A licence will no longer be in force when the licence is revoked or the application for licence, under section 9 of the Act, has been granted or refused,

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under section 10 of the Act.

***Possession of digital blueprints for manufacture of firearms***

7. SIFA and Sam Wilks raised concerns that the definition of 'digital blueprints' and 'possession' are very broad and may invite technical litigation. For example, SIFA noted that many firearms are supplied with user manuals that include exploded technical diagrams to assist with cleaning, maintenance and safe handling and are commonly available in digital formats.
- a. *Given that such diagrams do not contain the dimensional specifications, tolerances or machine instructions required to manufacture a functional firearm, can you clarify whether such material would be captured by the proposed definition of 'digital blueprint' in the Bill?*
  - b. *Was any consideration given to the inclusion of a note in the Bill or Explanatory Statement to clarify the intended operation of the definition of 'digital blueprint'? If not, why?*
  - c. *Was any consideration given to the inclusion of an exemption for the possession of illustrative, instructional or non-dimensional materials, such as user manuals and maintenance diagrams? If not, why?*

Question 7

Digital blueprint means any type of digital (or electronic) reproduction of a technical drawing of the design of an object. For a diagram to be captured by the definition of a 'digital blueprint', under the new section 61B, the diagram must be reproduction of a technical drawing in a digital or electronic form.

The Act provides various exemptions in relation to the offence in new section 61B, including new subsection 4(4AA)(b) which provides an exemption for the possession of a digital blueprint if the person is authorised by a licence or permit to manufacture a firearm, or part of a firearm, based on a digital blueprint.

The inclusion of a note in the Bill and examples in the Explanatory Statement were considered, however a broad scope of the definition is required to ensure there is no inadvertent limitation imposed on the application of the Act with new and emerging technologies. Further to this, notes are often used to draw attention to other relevant statutory provisions, or to insert layman terms that may assist with interpreting legal definitions (for example, the note for 'firearm related item' in section 49C(c) of the Act includes lay terms such as 'breech block' or 'magazine'). In the context of a digital blueprint, neither were considered relevant or useful for the interpretation of this definition.

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***Sale, Purchase and Possession of Ammunition***

8. While acknowledging the practicality of the proposed amendments to sections 68A and 69, it has been suggested that firearms dealers and staff will need clear guidance on what counts as a 'corresponding licence' or 'corresponding permit' across jurisdictions; particularly where interstate categories, endorsement or documentary formats differ.
- a. *Has any consideration been given to the development and publication of a verification guide for firearms dealers and ammunition sellers identifying corresponding interstate categories and acceptable documentary proof? If not, why?*

Question 8

The FPRU are in constant communication with firearms dealer licence and ammunition retail permit holders in relation to the sale of ammunition to corresponding licence or corresponding permit holders.

Section 68A of the Act provides the process which the holder of a firearms dealer licence or ammunition retail permit must comply with when selling ammunition. That is, the holder of a firearms dealer licence or ammunition retail permit must sight the purchaser's licence or permit (including a corresponding licence or permit). It is anticipated that the LPVS, developed and delivered as part of the NFR, will streamline the current process so that it is easily identifiable who can and cannot purchase ammunition.

***Matter to be Notified***

9. Proposed section 125 (1)(b) provides that any person who holds a firearms licence, permit or certificate of registration and previously destroyed, defaced, damaged, disposed of, or rendered a firearm wholly or partly inoperable must notify the Commissioner within 30 days of the Act commencing.
- a. *Given SIFA's comments, can you clarify whether the Committee is correct in its understanding that inclusion of proposed section 125 is retrospective in nature and designed specifically to collect the data necessary to ensure the NT's firearm records are up to date; thereby facilitating future enforcement of notification requirements under proposed section 90(2).*

Question 9

New section 125 is not retrospective in nature. The notification period is within 30 days from the commencement of the *Firearms Amendment Act 2026*.

New section 125 creates an offence to reflect amendments to sections 90(2) and 90(4), where:

- a person is the holder of licence, permit or certificate of registration immediately before the commencement; and
- a firearm to which the licence, permit or certificate relates was rendered inoperable (in whole

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- or in part), destroyed, defaced, damaged or disposed of, before the commencement, and
- the person fails to notify the Commissioner in writing, within 30 days after the commencement of that circumstance and is reckless in relation to that failure.

This is necessary because these circumstances have not previously required notification to the Commissioner under section 90(2) of the Act nor necessarily been prohibited under section 68 of the Act. This new offence will also allow all records of firearm disposals, damage, destruction, defacements, or rendering inoperable to be updated in the police systems, allowing for future enforcement of the new statutory requirements.

10. **The Committee notes that a number of provisions in the Bill amend the obligations, responsibilities and compliance requirements of licence holders; all of which are offences of strict liability.**
  - a. ***What strategies does the NT Police Force have in place to ensure that licence holders are made aware of any changes to their obligations, responsibilities and compliance requirements under the Firearms legislation following passage of the Bill?***

Question 10

A Communication Strategy is being developed which will deliver key messages targeted to licence and permit holders, stakeholders and the community. Following passage of the Bill, the Communication Strategy will utilise numerous platforms e.g. social media, email, newsletters and face to face communication based on established mechanisms that ensure broad demographic coverage.