

## **AgForce Queensland Farmers Ltd – submission in support of Firearm Suppressor use for primary producers**

### **AgForce Firearms Policy - in brief**

AgForce Queensland Farmers supports the reasonable access to and safe use of any firearm Category (A, B, C, D, and H) and noise suppression devices under Category R, that ensures:

- a) Prompt, safe, and humane euthanising of livestock that exhibit terminal illness; injury; or serious distress due to adverse environmental conditions.
- b) Culling of feral animals, both opportunistic and trapped, when a primary producer is attending to property management practices (e.g. mustering, or completely a water-run) on a motorbike or in a vehicle. AgForce Queensland Farmers only condones the use of Category H (handguns) on a feral animal when it is trapped, therefore ensuring humane destruction at a short-range.
- c) A safe working environment for primary producers - e.g. the safer carry of a short-arm (Cat H) firearm compared to a long-arm (e.g. when mustering on two-wheel motorbike through scrub country a long-arm rifle carried by sling over the shoulders of the rider can be caught on low level branches therefore potentially causing serious injury); and, enhanced work-place health and welfare outcomes with the use of noise-suppressing devices (Cat R) to reduce the sound caused by discharging a firearm.

### **Matters for consideration**

#### **Safe working environments**

The fitting of a suppressor to a firearm plays a functional health and safety role in reducing noise and hearing damage for both the shooter and any bystanders. The *Work Health and Safety Act 2011* (Qld) states a person conducting a business or undertaking must ensure, so far as is reasonably practicable, the health and safety of workers engaged by the person, and therefore should not expose the worker to health and safety risks arising from the business. Additionally, section 19 (5) of the Act states self-employed persons must ensure their own safety whilst at work.

With the exception of the Queensland Police Service and Queensland-based Australian Defence Force personnel, Queensland's primary producers make up the largest number of legitimate firearm users for normal "business-as-usual" needs, with the specific purposes of euthanising of livestock to meet animal welfare needs, and control of feral animals.

In a report titled "*Hazard Control Measures - Firearm Noise*" by D. Adams, Adams notes that a blast from any kind of firearm is more than 140dB, which is enough to cause permanent damage to hearing tissue; and where Branch notes in their 2011 paper "*Comparison of Muzzle Suppression and Ear-level Hearing Protection in Firearm Use*", hearing loss or noise induced ear injury is a preventable disability.

While still quite audible, a suppressor can reduce the sound of the blast to well below the 140dB level, more so than that of earplugs or earmuffs. Earplugs or earmuffs, classed as personal protective equipment (PPE), can only reduce noise exposure by 20-30 decibels, compared to suppressors which are at least 50% better at noise reduction (Branch, Gianoli, Ress, & Wheeler, 2017). PPE is the least favoured form of risk control when wanting to reduce noise hazard as it limits the senses of the shooter (Adams), leaving them vulnerable in potentially dangerous situations. PPE also carries the risk of human error in forgetting to put hearing protection in/on. Timely attention is often required when invasive pests are spotted due to the narrow opportunity the shooter has to act. This encourages the lack of use of PPE to save time before the window of opportunity closes (Adams).

Australian/ Queensland WHS policy highlights PPE as being the last step in the WHS hierarchy of controls, where suppressors are an engineering solution which is vastly superior, and a better option given elimination and substitution are not practical options when considering firearm noise in a primary production environment.

## **Humane and Efficient Culling of Animals**

Under the Queensland Government's *Biosecurity Act 2014*, landowners have a general biosecurity obligation and are responsible for taking all reasonable and practical steps to minimise the risks associated with invasive animals. The culling of invasive pests with a firearm is one way producers meet their general biosecurity obligation.

Often, the culling of feral animals is largely opportunistic. Feral animals are usually seen at impromptu times, sometimes in groups, such as when the producer is attending to property management practices like checking livestock water supplies. The use of a firearm suppressor can increase the effectiveness of population control activities as it minimises fear cues which may trigger a flight response in the pest (Department of Primary Industries, Park, Water and Environment, Tasmanian Government, 2011). A minimised chance of triggering a flight response means there is less dispersion of the group of pests, allowing for increased opportunity and efficiency in culling activities. Efficient pest population control activities are critical for optimal primary production, improvement of enterprise viability, and assists a producer in meeting their general biosecurity obligation.

With proper use, firearms provide one of the quickest and most effective methods of humane culling of animals. Suppressors, through reducing the sound of the gun shot, can limit the stress on the animal as the flight response is not triggered by the noise of the firearm; and which may reduce animal disturbance, which facilitates higher accuracy and efficient and humane culling..

## **Public safety**

It is understood that the governments of New South Wales, Victoria, Northern Territory, Australian Capital Territory and South Australia currently allow the use of suppressors under permit systems, suggesting that the benefits of suppressor use outweigh any perceived risk to public safety. In fact, SafeWork NSW recently offered rebates of up to \$500.00 to professional shooters who purchased a firearm suppressor as recognition of the WHS benefits the suppressor provides.

The perceived public safety concern that "silencing" firearms will increase crime and make the community more vulnerable because they are unable to hear the shots fired is factually incorrect. Research by Branch, Gianoli, Ress and Wheeler published in 2017 notes that the suppressor does not render the weapon silent, with blasts still being at the 120dB level depending on the weapon being fired.

Queensland's primary production businesses are currently disadvantaged in comparison to their peers in other states, both from the perspective of business position/capability and in terms of being able to comply with WHS legislation in their workplaces. Making suppressors available to a limited group of individuals via a regulated permit system does not cause any increase in risk (real or perceived) to public safety.

## **AgForce recommendation**

That the Queensland State Government provide primary producers with access to firearm suppressors, being an efficient, well-engineered tool that reduces the risk of hearing loss and allows for more humane and efficient culling of problem wildlife, by simply changing current regulation to remove Suppressors from Category R and place them in a more appropriate category such as Category A, B or C.

## References

Adams, D. (n.d.). *Hazard Control Measures - Firearm Noise*.

Branch, M. (2011). Comparison of Muzzle Suppression and Ear-level Hearing Protection in Firearm Use. *American Academy of Otolaryngology - Head and Neck Surgery*, 950-953.

Branch, M., Gianoli, G., Ress, B., & Wheeler, T. (2017). *Position Paper in Favour of Firearm Suppressors to Prevent Hearing Loss*. Pasadena: Doctors for Responsible Gun Ownership.

Department of Primary Industries, Park, Water and Environment, Tasmanian Government. (2011). *Trials Into the Use of Firearm Sound Suppressors for Browsing Animal Control in Tasmania*.