



PO Box 18018  
COLLINS ST EAST VIC 8003

Web: [www.nationalshooting.org.au](http://www.nationalshooting.org.au)  
Email: [admin@nationalshooting.org.au](mailto:admin@nationalshooting.org.au)  
Mob: 0425 746 066

8 September 2021

Mr Mike Callaghan AM PSM  
The Banking Code Review  
PO Box H218  
**AUSTRALIA SQUARE NSW 1215**

Dear Mr Callaghan,

### **Submission to The Banking Code Review**

The National Shooting Council represents the political interests of the shooting community and welcomes the opportunity to provide this submission to the Review.

While we met with you on 16 July, we thought it would be beneficial to follow it up with this submission as record of the views we put forward.

We note that another shooting group made a submission in respect of issues affecting firearm dealers. We support those comments wholeheartedly.

Our focus is more on the policy positions some banks have taken in respect of providing banking services to the firearms community.

As you will be aware, shooting is an Olympic sport. It also provides significant environmental and economic benefits to the Australian community. The worth of the sector is in the vicinity of \$5B per annum.

News of tragic events involving firearms in other countries and other conduct clearly of an illegal nature has, unfortunately, allowed some to view the shooting sports in a different light.

While the majority of banks have taken responsible positions on the firearms industry, some have taken adverse positions that have been based on factors that are simply not relevant to our industry. As a result, these positions have been provocative and offensive to our community.

It is our view that while banks need to have the flexibility to service the communities they choose to service, we do not believe they should be allowed to promote policy positions based on incorrect information or beliefs.

We submit that where a bank decides to deny the provision of banking services to a particular part of the community, the decision must be based on information that is factual and verifiable. At a minimum, it will ensure that policy justifications are made on information that the broader community can have confidence has been properly researched and presented.

At our meeting, we suggested that an improvement to the code to address this would be for the ability of any community adversely by a bank's policy, to contest that policy an ex-post or ex-ante basis.

That is, we believe it would be appropriate if the Australian Banking Association could hear disputes over the merits or accuracy of the basis underpinning a policy to exclude the provision of banking services from a particular community, and for their decision to be binding on the bank.

This would give that community the opportunity to test the basis of the policy without affecting the right of the bank to conduct business in a prudent and fair manner.

In our case, it would allow the firearms industry to challenge the truthfulness of claims made in developing and promoting policies affecting it.

That is only fair.

Once again, thank for the opportunity to make this submission.

▬

Yours sincerely

A handwritten signature in red ink, appearing to be 'Neil Jenkins', written over a light grey rectangular background.

Neil Jenkins  
National Secretary

**M: 0425 746 066**

**E: [admin@nationalshooting.org.au](mailto:admin@nationalshooting.org.au)**