



**AFPA**

**JANUARY 2026**

# **Review of the Exposure Draft Legislation: Combatting Antisemitism, Hate and Extremism Bill 2026**

**Parliamentary Joint Committee on Intelligence and Security**

## ***Executive Summary***

The Australian Federal Police Association (AFPA), represents sworn and unsworn Australian Federal Police (AFP) appointees who enforce Commonwealth criminal law and protect the Australian community from serious threats, including hate crime and extremism.

The AFPA presents this submission at a critical juncture in Australia's domestic security and public safety environment and welcomes the opportunity to provide feedback on the exposure draft of the *Combatting Antisemitism, Hate and Extremism Bill 2026* (the Bill).

The purpose of this submission is to provide an operational law enforcement perspective on the Bill, with a specific focus on how the proposed measures will function in practice for the AFP and its hardworking appointees.

AFP appointees, many who are AFPA members, sit and will continue to sit at the frontline of responding to hate crime, extremist activity, and ideologically motivated violence. They detect emerging threats early, investigate complex networks, use coercive powers, and enforce criminal offences in fast moving, often high risk environments. Legislative design directly shapes whether they can do this work lawfully, safely, and effectively.

This submission acknowledges and supports the policy intent of the Bill and supports the Bill progressing.

The AFPA recognises the seriousness of antisemitism and other forms of hate driven conduct, and the need for a strong legislative response. The Bill is framed as a national response to the antisemitic terrorist attack at Bondi Beach on 14 December 2025, which is expressly cited as the trigger for the national gun buyback scheme.

The AFPA also supports the establishment of a *Royal Commission on Antisemitism and Social Cohesion* and *Richardson Review* and seeks a formal role in those processes. The AFP and its workforce will sit at the centre of the operational response to hate and extremism. The AFPA's participation would ensure the *Royal Commission* and *Richardson Review* hears directly from frontline policing on threat trends, investigatory barriers, resourcing pressures, workforce wellbeing impacts, and what works in practice to prevent harm and maintain community confidence.

This submission does not seek to weaken the Bill's objectives. It seeks to strengthen them by improving clarity, enforceability, and legal durability. It is intended to assist by identifying areas where the Bill may create unintended operational consequences for frontline officers, investigators, and intelligence practitioners. It highlights provisions that may expose officers to legal uncertainty, increase litigation risk, or prove difficult to apply consistently in real world policing contexts.

The AFPA's observations and propositions focus on practical improvements. These include clearer statutory thresholds, better alignment between fault elements and evidentiary realities, appropriate safeguards for officers exercising new powers, and mechanisms to ensure the impact of the legislation on policing resources is properly assessed over time.

Ultimately, the purpose of this submission is to support the effective implementation of the Bill in a way that enhances community safety, upholds the rule of law, and ensures the AFP and state and territory police services can enforce the legislation with confidence, consistency, and fairness.

### ***The Australian Federal Police Association (AFPA)***

The AFPA is a registered organisation and an autonomous sub-branch of the Police Federation of Australia. The AFPA represents the industrial, political, and professional interests of members of the AFP, law enforcement officials in the Australian Criminal Intelligence Commission, and members of the Department of Parliamentary Services.

Our members provide an essential service to Australia. They are the backbone of the Commonwealth's principal law enforcement agency, performing crucial investigative, intelligence and national security functions.

The AFP is responsible for:

-  providing community policing services to the Australian Capital Territory and other territories including Christmas Island, Cocos (Keeling) Islands, Norfolk Island and Jervis Bay,
-  enforcing Commonwealth laws that combat complex, transnational, serious and organised crime, child exploitation, fraud, corruption, and cybercrime,
-  protecting Australians and Australian interests from terrorism and violent extremism,
-  removing wealth and property from criminals that have been illegally obtained,
-  protecting Commonwealth infrastructure, including designated airports, Parliament House, and embassies,
-  protecting domestic and foreign dignitaries, including the Governor-General, Prime Minister, and ambassadors,
-  protecting at-risk individuals,
-  representing Australian police and law enforcement at an international level, and
-  developing unique capabilities and exploiting advanced technology to support Australia's national interests.

## ***General Observations of the Exposure Draft Legislation: Combatting Antisemitism, Hate and Extremism Bill 2026***

The AFPA recognises the urgency that underpins the Bill. Anti-semitism, hate crime, and extremist activity have increased in frequency, visibility, and organisation across Australia.

The AFP and its appointees and other police services across Australia are encountering more ideologically motivated incidents that fall below the terrorism threshold but pose a real risk to public safety and social cohesion. The AFPA believes that the Bill responds to this gap.

The Bill represents a significant expansion of Commonwealth criminal and regulatory powers. It introduces new offences, new listing regimes, expanded seizure and direction powers, enhanced background checking, and additional migration and customs consequences. These measures will materially change how AFP appointees investigate, disrupt, and prosecute hate-driven conduct.

From an operational perspective, the scale and breadth of the reforms create implementation risks that require careful management.

First, the Bill consolidates multiple complex regimes into a single legislative package. This reflects the interconnected nature of hate and extremism. It also increases the cognitive and legal load on frontline officers. AFP appointees will be required to apply new definitions, fault elements, evidentiary thresholds, and defences across several Acts, often in fast-moving environments. Without clear guidance and staged implementation, this increases the risk of inconsistent application.

Second, several provisions lower fault elements, reverse burdens of proof, or rely heavily on strict liability. These approaches may be justified on policy grounds. They also place greater responsibility on individual officers and investigators to assess compliance at the point of enforcement. This is particularly acute in public order situations, online investigations, and symbol-related offences, where intent and context are often contested after the event.

Third, the Bill relies extensively on intelligence-informed decision-making. This is evident in the prohibited hate group regime, migration consequences, and firearms background checking. Intelligence-led policing is essential and it also raises challenges around disclosure, evidentiary use, and procedural fairness. Officers may be required to act on intelligence that cannot be fully tested in open court, increasing litigation risk and operational complexity.

Fourth, the Bill creates new enforcement expectations without explicit recognition of resourcing impacts. Investigating hate crime and extremist networks is labour intensive. It requires specialist skills, digital capability, and sustained community engagement. New offences and powers will increase referrals, reporting, and investigative workload. Without mechanisms to review and adjust resourcing, there is a risk that enforcement becomes uneven or reactive rather than strategic.

Fifth, the Bill will heighten scrutiny of police decision-making. Hate crime enforcement attracts significant public, media, and legal attention. AFP appointees and state and territory police services exercising new powers will be closely examined by courts, oversight bodies, and the community. Legislative clarity and statutory protections are essential, both to protect police officers and to maintain public confidence in the legitimacy of enforcement action.

The AFPA also acknowledges that many of the proposed measures are untested in Australian criminal law. Several offences and regulatory mechanisms will require prosecution and judicial consideration before their practical effectiveness can be fully assessed. The judiciary will play a critical role in interpreting key concepts such as recklessness, reasonable steps, reasonable person standards, and the use of intelligence-based evidence.

This process is an inherent feature of complex criminal law reform. Not all uncertainties can be resolved at the drafting stage. For this reason, the Association places strong emphasis on post-commencement monitoring and review. Analysis of charging decisions, prosecution outcomes, judicial interpretation, and appellate guidance will be necessary to determine whether further refinement is required.

Finally, the AFPA notes that the Bill's success will depend heavily on implementation rather than intent alone. Training, operational guidance, inter-agency coordination, and structured review will determine whether the reforms achieve their objectives. Legislation that is strong on paper but difficult to apply in practice risks under-enforcement, legal challenge, and unintended consequences.

For these reasons, the AFPA's observations and propositions are directed at ensuring the Bill is operationally workable, legally robust, and capable of being enforced consistently by the AFP and state and territory police services across a range of policing contexts.

### ***Observations and Propositions:***

While the AFPA supports the Bill, the following issues must be considered to ensure the Bill is clear, enforceable, legally durable, and workable for the AFP and state and territory police services in real world operational settings.

The AFPA also recognises that many of the proposed provisions will be untested at commencement. Their practical effect will only become clear through operational use, prosecution, and judicial consideration over time. The AFPA acknowledges that unforeseen consequences may emerge as courts interpret and apply the new settings. Further legislative refinement may be required to preserve the Bill's intent, ensure consistent application, and manage impacts on policing resources and community confidence.

Propositions One through Six focus on the anti-semitism, hate crime, and extremism elements within the Bill, while Propositions Seven through Eight focus on the firearm elements.

### ***Observation and Proposition One:***

#### ***Create a clear law enforcement exemption for customs controls on extremist material and prohibited symbol goods***

##### **Issue**

*Schedule 3, Part 1, Division 1* of the Bill expands the customs prohibited material framework to capture goods that are violent extremist material, and goods that are or depict prohibited symbols, for both export and import controls. This is done through amendments to the *Customs (Prohibited Exports) Regulations 1958*, inserting new *subregulation 3(2AB)*, and to the *Customs (Prohibited Imports) Regulations 1956*, inserting new *subregulation 4A(1AB)*.

AFP and state and territory police services may require controlled handling and movement of seized exhibits and accredited training material that includes violent extremist material or prohibited symbol imagery.

### **Proposed action**

Amend *Schedule 3, Part 1, Division 1* of the Bill, and any related instruments, to include an express exemption for law enforcement agencies to import, export, possess, and transport goods captured by *subregulation 3(2AB) of the Customs (Prohibited Exports) Regulations 1958* and *subregulation 4A(1AB) of the Customs (Prohibited Imports) Regulations 1956*, where the purpose is evidentiary, forensic, intelligence, or accredited training.

The exemption should require secure handling conditions, including storage, access controls, logging, and disposal requirements.

### **Example**

AFP appointees need to move prohibited symbol exhibits interstate for trial, or import seized devices for specialist forensic work. The exemption avoids delay and compliance risk.

### **Operational benefit**

Faster investigations and prosecutions and cleaner evidence continuity. Also reduced risk of technical non-compliance to the Acts and less unnecessary administrative workload for police officers.

## ***Observation and Proposition Two:***

### ***Restore procedural fairness, with a secure process, for listing prohibited hate groups***

#### **Issue**

*Schedule 1, Part 4*, of the Bill (*Prohibited hate groups*) introduces the prohibited hate group listing framework, including proposed *section 114A.4 (Regulations specifying prohibited hate groups)*.

Proposed *subsection 114A.4(5)* states the AFP Minister is not required to observe procedural fairness when deciding whether the Minister is satisfied for the purposes of listing.

The same Part also inserts proposed *section 114A.5, (Director-General of Security advice to be provided before specifying an organisation as a prohibited hate group)* and states the Director-General is not required to observe procedural fairness in providing that advice. These exclusions increase litigation risk and can weaken legitimacy at the point of enforcement.

#### **Proposed action**

Amend *Schedule 1, Part 4* of the Bill by replacing the blanket procedural fairness exclusions in proposed subsections *114A.4(5)* and *114A.5(5)* with a structured procedural fairness model that still allows urgent action, including:

- A standard notice and submissions process, with a defined timeframe.
- An urgent listing pathway where immediate risk exists, with mandatory post-listing notice and a submissions window.
- A protected information mechanism for security sensitive material, including confidential summaries where possible.

This should sit alongside the existing safeguards in *Part 4*, including the requirement that the AFP Minister may only consider recommending a regulation after receiving advice from the Director-General under *114A.5(2)* and the pre-listing requirements in *114A.6* for Attorney-General agreement and an Opposition briefing.

#### **Example**

An organisation is listed based partly on intelligence that cannot be disclosed. A secure procedural fairness process allows a summary of allegations and a chance to respond, while protecting sources and methodology.

#### **Operational benefit**

Fewer legal challenges, stronger legitimacy, and less operational disruption caused by contested listings.

#### ***Observation and Proposition Three:***

##### ***Tighten the statutory threshold for “association” in migration decisions***

#### **Issue**

*Schedule 1, Part 1, Migration Act* amendments expands the definition of “association” so it means meeting or communicating with an organisation, and notes it may consist of a single meeting or single communication.

*Schedule 1, Part 1* also provides that the Minister is not required to determine whether membership or association is ongoing. These settings can capture incidental contact and produce inconsistent outcomes.

#### **Proposed Action**

Amend *Schedule 1, Part 1* so that “association” requires a meaningful connection, and a clearer link to support for the organisation’s purposes. This should align with the Bill’s own “support” concept in the spreading hatred and extremism grounds, which turns on whether an association provides support and whether that association advances the purposes of the organisation.

#### **Example**

A person attends a public event where a prohibited hate group member is present and later exchanges one message. The amendment would avoid treating this as “association” without additional evidence of a meaningful connection and a link to support.

#### **Operational Benefit**

Better targeting of high-risk individuals, fewer borderline referrals, and stronger decision making that stands up to review.

#### ***Observation and Proposition Four:***

##### ***Strengthen safeguards for seizure, retention, and disposal of items displaying prohibited symbols***

#### **Issue**

*Schedule 1, Part 7 (Hate Symbols)* of the Bill inserts *Division 6, Seizing things displaying prohibited symbols* into the *Criminal Code Act 1995* framework.

It also inserts *section 80.2N (Seizing things displaying prohibited symbols in public)*. Under *section 80.2N(3)* a police officer may use force or assistance considered reasonably necessary when seizing the thing.

The Bill also permits destruction or disposal if no application for return is made within 90 days under *section 80.2N(6)*. These settings elevate complaint risk, property dispute risk, and chain of custody issues, including where an item later becomes relevant to proceedings.

### **Proposed Action**

Amend *Schedule 1, Part 7, Division 6, section 80.2N* to strengthen safeguards, while keeping the core seizure power and return application pathway in *section 80.2N(4) to (6)*.

The amendments should include:

- A mandatory written receipt at the time of seizure, capturing description, time, location, and officer identification.
- Defined steps to identify and notify the owner within a set period, linked to the return process in *section 80.2N(4)*.
- A presumption of return within 28 days if no charge is laid and the item is not required as evidence, consistent with the evidentiary retention gateway in *section 80.2N(5)(b)*.

### **Training and education retention, exemption pathway**

The AFPA recognises some seized items may have legitimate value for accredited police training and education, including symbol recognition and extremist methods. The AFPA supports limited retention for these purposes, but only under a controlled exemption model.

The Bill should allow retention for training only where the AFP Minister grants an exemption, with conditions on secure storage, access controls, handling, and disposal. This exemption pathway should align with the law enforcement exemption approach proposed under *Schedule 3, Part 1, Division 1* of the Bill for customs controls on violent extremist material and goods that are or depict prohibited symbols.

### **Example**

Police seize a prohibited symbol patch displayed in a public place under *section 80.2N(1)*. The item is not required as evidence once proceedings finalise, but it has value for accredited training. The AFP then applies to the AFP Minister for an exemption to retain the item in a secure training collection, subject to strict conditions.

### **Operational benefit**

Stronger chain of custody and complaint handling. Better training outcomes and capability uplift and the reduced risk of uncontrolled retention and clear governance that protects members and maintains community confidence.



### ***Observation and Proposition Five:***

#### ***Set minimum national operating standards for the directions power***

##### **Issue**

The Bill expands the directions framework by clarifying that a direction can be given where a prohibited symbol is being displayed “including by” a person. The seizure power is expressly linked to reasonable suspicion under the directions provision. Without minimum standards, inconsistent practice and complaint risk rise.

##### **Proposed action**

Insert a statutory requirement for minimum operating standards for giving directions, with recording and evidence expectations aligned to the reasonable suspicion gateway.

##### **Example**

Two similar incidents occur in different places and receive different treatment. A consistent standard reduces inconsistency and improves decision quality.

##### **Operational benefit**

More consistent enforcement, better evidence, safer interactions, and stronger public confidence.

### ***Observation and Proposition Six:***

#### ***Introduce mandatory minimum sentencing for antisemitism, hate and extremism offences***

##### **Issue**

The Bill sets substantial maximum penalties and strengthens sentencing settings for hate driven offending, including aggravated sentencing considerations that require courts to treat hatred-based motivation as an aggravating factor. It also makes broader sentencing related changes across relevant offence types.

Maximum penalties set an outer limit, but courts rarely impose maximum penalties in practice. This can produce outcomes that do not reflect the gravity of antisemitism, hate crime, and extremist offending, reduce deterrence, and undermine community confidence.

##### **Proposed action**

Amend the Bill to introduce mandatory minimum sentences on conviction for specified antisemitism, hate, and extremism offences, including aggravated forms, repeat offending, and offending involving violence, threats, weapons, planning, or group-based coordination.

This should be implemented through a dedicated mandatory minimum sentencing Part, inserted into the Bill’s sentencing amendments, and should align with the Bill’s existing hate based sentencing uplift framework in *Schedule 2, Part 1 (Sentencing amendments)*.

The amendments should:

- Define the offences and aggravating factors that trigger the mandatory minimum, building on the Bill’s approach to hatred as an aggravating factor.
- Set clear minimum custody thresholds, with higher minimums for repeat offenders and serious harm.

- Provide a tightly defined exception for genuinely exceptional circumstances, with mandatory reasons recorded by the sentencing court.

### **Example**

Two offenders commit the same extremist intimidation offence in different jurisdictions with comparable facts. One receives custody and the other receives a non-custodial penalty. A mandatory minimum inserted through *Schedule 2, Part 1* reduces disparity and ensures a baseline consequence that reflects the harm and aligns with the Bill's hate based sentencing intent.

### **Operational benefit**

Stronger deterrence and greater sentencing consistency across Australia. It also provides clearer expectations for victims and communities and better alignment between frontline risk and court outcomes.

### ***Observation and Proposition Seven:***

#### ***Insert a formal policing impact and resourcing review clause***

### **Issue**

The Bill creates substantial new demand across powers, offences, migration decisions, customs controls, and firearms settings. A clear example is *Schedule 4, Part 1, Division 1, National gun buyback*. It defines the buyback period as 1 January 2026 to 31 December 2027, unless a different period is set for a State. It allows the AFP Minister to determine a different period *by notifiable instrument*. It also ties the buyback to a broader national firearms program, defined to include National Cabinet commitments made or affirmed on 15 December 2025.

Without a structured review, Government will lack clear evidence on outcomes, displacement, litigation, and resourcing impacts.

### **Proposed action**

Insert a new statutory review clause in the Bill, in a dedicated *Part, Review of the Act*, requiring an independent review of the Act's operation and impact. The clause should require the review to be tabled in Parliament and to assess:

- Enforcement outcomes across the new and amended powers and offences, including the operational use of coercive powers.
- Complaints, civil claims, and litigation trends linked to the new frameworks.
- Prosecution and court outcomes, including delays and contested issues.
- Impacts on AFP resourcing and specialist capability demand, including cyber, intelligence, exhibits, and operational training.
- Impacts linked to the *Schedule 4, Part 1, Division 1* buyback and national firearms program settings, including the effect of notifiable instrument variations across States.

Set review points as determined by the AFP Minister after commencement, with a required response within 6 months for tabling.

### **Example**

An AFP-led joint taskforce identifies an emerging trend where a particular high risk firearm component is being imported in small consignments, then modified and distributed domestically. The importer argues it is not captured by the rules made under *Schedule 4, Part 4, Division 1*,

specifically the public safety test framework inserted into the *Customs (Prohibited Imports) Regulations 1956* through proposed *regulation 4FA*.

The review finds that assessment activity under the public safety test has increased referrals, intelligence checks, and exhibit handling workload for the AFP and state and territory police services, but inconsistent rule settings and variable assessment timeframes have created enforcement gaps. The review also finds that changes introduced through notifiable instruments under *Schedule 4, Part 1, Division 1* have produced uneven buyback and compliance effects across jurisdictions, increasing cross border diversion risk and tasking for AFP disruption teams.

Based on the review, Government tightens the rules and assessment criteria, sets clearer timeframes, and funds dedicated operational and forensic capacity to manage the increased workload.

### **Operational benefit**

Better policy refinement, better resourcing decisions, and safer and more sustainable enforcement.

### ***Observation and Proposition Eight:***

#### ***Fund and define service standards for firearms background checks and information flows***

##### **Issue**

*Schedule 4, Part 2, Division 1 (AusCheck amendments)* of the Bill amendments establishes firearms background checks within the *AusCheck Act 2007* framework. It inserts definitions and expands the AusCheck scheme to cover checks conducted for *paragraph 8(1)(f)*, including checks connected to firearms licensing decisions and certain applications by law enforcement and national security agencies.

It also inserts *section 10B (Matters covered by AusCheck scheme, firearms background checks)*, which allows the scheme to make provision for applications, required information (including consent), the manner of conducting checks, assessment criteria, and the form of advice about the status or outcome of a check.

Without service standards and funding, delays and backlogs will shift workload and risk onto AFP appointees and state and territory licensing partners, through repeated follow ups, operational escalation, and inconsistent turnaround times.

##### **Proposed action**

Amend *Schedule 4, Part 2, Division 1* of the Bill to legislate, or require by regulation under the *AusCheck scheme power in section 10B(1)*, minimum service standards that apply nationally, including:

- Timeframes for routine checks and urgent operational checks, noting *section 10B(1)* contemplates the scheme setting how checks occur and the form of advice.
- Defined escalation pathways for time critical operational needs, consistent with *section 10B(1)(a)* and *(e) to (f)* which cover applications and advice outputs.
- Audit and access controls for information use and disclosure, noting the Bill also tightens application of information handling provisions to firearms background checks.

- A funding commitment tied to demand growth created by the expanded scheme coverage, including applications by law enforcement and national security agencies.

### **Operational benefit**

Faster and safer licensing decisions with reduced frontline friction. Better compliance and confidence across agencies, because checks and advice outputs run to consistent national standards.

### **Conclusion**

The AFPA supports the *Combating Antisemitism, Hate and Extremism Bill 2026* and recognises the Bill is a direct response to a serious national threat environment, including the antisemitic terrorist attack at Bondi Beach on 14 December 2025, which the Bill cites as the trigger for the national gun buyback scheme in Schedule 4, Part 1, Division 1.

The Bill's focus on hateful conduct, extremist material, and firearms risk reflects a community expectation that government will act decisively, and that law enforcement will have the tools needed to prevent harm.

Support for the Bill does not mean every clause is ready in its current form. The AFP and state and territory police services are the ones who must translate legislative intent into action, often in volatile, time pressured environments. That reality should shape the final drafting and if the Government wants these reforms to work, the Bill must be enforceable at the point of contact, resilient in court, and sustainable for policing resources over time.

Several aspects of the draft as written increase legal and operational risk. The removal of procedural fairness for prohibited hate group listings sits in *Schedule 1, Part 4 (Prohibited hate groups)*, including the procedural fairness exclusions in proposed *subsections 114A.4(5) and 114A.5(5)*. These exclusions can drive challenge and distrust at exactly the moment the framework needs legitimacy.

The expansion of "association" for migration purposes is located in *Schedule 1, Part 1 (Migration Act amendments)*, which defines association as meeting or communicating, and notes it may be a single meeting or communication, and also provides the Minister is not required to determine whether membership or association is ongoing.

These settings risk capturing incidental contact, encouraging contested decision making, and increasing demand on policing systems for marginal cases.

The prohibited symbol framework also requires careful calibration to avoid unnecessary complexity and dispute. The Bill's hate symbols package in *Schedule 1, Part 7* creates new operational touchpoints in public facing policing, including the *Division 5 (Directions power)* amendments and the *Division 6 (Seizure powers)* in *section 80.2N*, which are directly linked to reasonable suspicion under the directions framework.

If the defence and enforcement settings are not clear and stable, police and prosecutors can be drawn into disputes that do not improve community safety.

At the same time, the Bill contains important and constructive elements that the AFPA wants to see succeed.

The creation of a clearer national response to prohibited symbols and extremist material reflects how modern extremism operates across borders and platforms, including through the customs changes in *Schedule 3, Part 1, Division 1*, which extend import and export controls to violent extremist material and goods that are or depict prohibited symbols.

The public safety test concept is also significant. It is implemented through *Schedule 4, Part 4, Division 1*, inserting public safety tests into the *Customs (Prohibited Imports) Regulations 1956*, including proposed *regulation 4FA* for firearms and proposed *regulation 4HA* for weapons.

The Bill's explicit recognition that "public" includes emergency services personnel is a meaningful acknowledgement of the risks borne by frontline workers.

The national gun buyback scheme, in *Schedule 4, Part 1, Division 1*, is framed as a national response to the Bondi Beach attack and sets a defined buyback period, with the capacity to vary by notifiable instrument. The AFPA recognises the strength of that policy signal.

The proposals suggested in this submission do not dilute the Bill's purpose, they strengthen it. They increase certainty for the community and for courts and they reduce inadvertent overreach that can distract from high-risk actors. They protect officers who will be asked to exercise new powers in public places, under scrutiny, and often under provocation. They also promote a mature accountability loop, so Government and the wider Parliament can assess what the legislation is doing in practice, including the resourcing consequences, and adjust settings based on evidence rather than noise. This includes review mechanisms that can measure the real operational impacts of reforms across *Schedule 1* and *Schedule 4*, rather than relying on assumptions at commencement.

The AFPA also supports the establishment of a *Royal Commission on Antisemitism and Social Cohesion* and *Richardson Review* and seeks a formal role in those processes. The *Royal Commission* and *Richardson Review* should draw directly on frontline policing experience, including operational threat trends, investigative barriers, workforce impacts, and what interventions reduce harm in practice. The AFPA's inclusion would strengthen the evidence base and improve the chances of durable, workable reform.

The AFPA also makes clear that the propositions in this submission are not intended to delay or frustrate the Bill's passage. The amendments are practical refinements that can be progressed in parallel with the Bill's advancement. They should not stop the progression of the Bill and they should strengthen it before commencement, reduce avoidable operational risk, and support consistent enforcement from day one.

The AFPA urges the PJCS and the Parliament to progress the Bill, and to adopt the practical propositions set out in this submission. The AFPA supports the Bill. AFP appointees and state and territory police services will carry this law into effect, and they need it to be clear, fair, and workable.