

25 August 2021

Explosives Regulation 2021  
Policy & Strategy,  
Better Regulation Division  
NSW Department of Customer Service  
4 Parramatta Square  
12 Darcy Street  
PARRAMATTA NSW 2150

[explosives@customerservice.nsw.gov.au](mailto:explosives@customerservice.nsw.gov.au)

Dear Sir/Madam,

**Consultation: Proposed Explosives Regulation 2021 – Submission.**

The Australian Paint Manufacturers' Federation welcomes the opportunity to comment on the proposed explosives regulation 2021.

The APMF seeks to advance the economic, environmental and societal contribution of Australia's paints and coatings industry. The industry contributes approximately \$3.8 billion to Australia's GDP annually and directly provides more than 6,500 FTE jobs, and supports more than 51,000 trade painters and numerous retail jobs.

In NSW, there are 117 businesses manufacturing paints and coatings. These manufacturers directly employ almost 2,000 FTE and contribute about \$1 billion to GSP. The majority of these manufacturers are small businesses. The industry also underpins the construction, renovation, and smash repair sectors in NSW and provides inputs to help maintain critical transport, marine, and other infrastructure in the state.

The APMF is concerned that the proposed classification of desensitised explosives as explosive precursors may impact paint manufacturers, paints distribution, and businesses (including sole traders) that use paints, coatings, and the products used to apply paints (thinners, dryers, solvents etc.). Therefore, to better understand the potential impacts and provide meaningful input to the RIS process, we request that the Department consult further with paint manufacturers to explain the changes and how they will apply outside the explosives industry.

The APMF would be happy to organise an online video conference for the Department and our members to discuss the proposals.

Yours faithfully

Bernard Lee  
Executive Officer