



SSAA NSW

20 August 2021

NSW Department of Customer Service
Attn: Policy & Strategy, Better Regulation Division

EXPLOSIVES REGULATION 2021

Thank you for the opportunity to make a submission on the proposed Explosives Regulation 2021.

The existing Explosives Regulation 2013 is scheduled for automatic repeal on 1 September 2022. The NSW Government has released the proposed Explosives Regulation 2021 and the accompanying Regulatory Impact Statement for stakeholders' consultation. The Sporting Shooters Association of Australia (NSW) (SSAA NSW) has been included as a key stakeholder by the NSW Government, due to the possible impact on our members regarding the ammunition and propellant powder used in reloading.

SSAA NSW is the peak body dedicated to promoting, protecting, and preserving sports shooting in New South Wales. With over 59,000 members and 136 branches and affiliated clubs across the state, SSAA NSW represents the safe, fun, and all-inclusive range of shooting sports available today.

After reviewing the proposed Regulation and in consultation with our membership, SSAA NSW is opposed to the added restriction Clause 50 (point 3). Clause 50 (point 3) restricts the maximum amount of propellant powder that can be stored at a single residential address to 12kg, regardless of the number of licence holders under the Firearms Act who reside at that address. This is a change from the current Regulation that has the 12kg limit based upon each authorised individual, not per household.

This may seem an innocuous change, but it has significant implications relating to the personal interests and shooting habits of either related or individual licenced members of residing at a single household. It is common for members of a household to reload different ammunition for different rifles for hunting, and/or target shooting competition, especially in rural communities.

When a variety of activities and competitions are undertaken by different household members, each will most likely require a different type of powder that is more suitable to their chosen rounds. The 12Kg limit per household limit creates a significant and unfair barrier to their legal reloading abilities.

• Promoting Shooters and Shooting Sports • Firearm Safety and Junior Development • Conservation and Ethical Hunting



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SSAA NSW is not aware of any evidence demonstrating that 12kg of propellant in one location is more dangerous and therefore needs to be decreased. Propellants are remarkably stable, particularly if stored in original containers in a cool, dry storage area.

SSAA NSW, therefore, requests that Clause 48 of the current Regulation (Explosives Regulation 2013) remains in place and is not replaced by the proposed Clause 50 (with the inclusion of point 3) of the Explosives Regulation 2021.

Alternatively we would be pleased to accept Clause 50 of the proposed Explosives Regulation 2021, with the exclusion of point 3.

On behalf of our 59,000 members, we appreciate the opportunity to contribute to the proposed Explosives Regulation 2021. We believe that we have successfully highlighted the significant impact of Clause 50 (point 3) on legal firearms owners.

Yours sincerely,

Lance Miller

President

SSAA NSW

Jai Rowell

CEO / Executive Director

SSAA NSW