

Snowballs on Shabbos?

Rabbi Yehuda Spitz

Let it Snow!!

With the raging “Elpis” Storm currently blanketing Yerushalayim with snow, meteorologists predicting (and children hoping!) that the accumulated snowfall will reach 20 centimeters, and the memory of Yerushalayim’s 2014 Asarah B’Teves / Erev Shabbos[1] “Blizzard”[2] [seemingly the worst since 5547 (1787),[3] or at least 5717 (1957)][4] still lingering,[5] there is one specific halachic sheilah that readily comes to mind.[6]

This is the very same question that this author was asked several times over that snowed-in Yerushalayim Shabbos and ultimately ended up addressing in a Shabbos shiur:

Is making snowballs permitted on Shabbos? And if not, why not?

Truthfully, the question is far more complex than one might think, and quite interestingly, no clear-cut consensus as to the proper rationales and reasons, even among those poskim who deem it prohibited.

Hotza’ah

Yet, one very important fact is clear. If the Eruv is down, or in a locale that does not have an Eruv, outdoor snowball fights (unless in an enclosed Reshus HaYachid) would certainly be forbidden, as throwing snowballs would transgress the prohibition of “Hotza’ah, Carrying.”[7] The question would not even start unless referring to a place with a reliable Eruv.

However, to define which actions or set of actions define snowball making, and whether or not it is prohibited is not so simple. Let us explore these issues further.

Muktzeh

First of all, is snow actually Muktzeh? Is one allowed to move it?

The common halachic consensus is that rain is not Muktzeh, even if it fell on Shabbos, as proven by Tosafos,[8] based on the Gemara in Eruvin,[9] as the moisture existed beforehand in the form of clouds. This is the halacha pesuka.[10] Would the same categorization apply to snow?

Many Acharonim, including the Chavos Yair, Even HaOzer, Maamar Mordechai, and the Butchatcher Rav,[11] as well as many contemporary authorities including the Minchas Shabbos, Rav Tzvi Pesach Frank, Rav Shlomo Zalman Auerbach, Rav Yosef Shalom Elyashiv, the Debreciner Rav, the She’arim Metzuyanim B’Halacha, Rav Ovadia Yosef, Rav Chaim Kanievsky, the Rivevos Efraim, the Nishmas Shabbos, and Rav Pesach Eliyahu Falk,[12] do

define snow similarly to rain, maintaining that the same rationale permitting utilizing rain on Shabbos applies to snow as well, and it is therefore not Muktzah.

However, Rav Moshe Feinstein held that snow is indeed considered Muktzeh, as nowadays people generally do not have a real use for it, and is akin to gravel, that its main use is simply to walk on it.[13] Additionally, he held that snow would be prohibited due to another concern as well. In Rav Feinstein's assessment, snow would be considered Nolad (came into existence on Shabbos) if it fell on Shabbos,[14] since, as opposed to rain, true as it might be, nevertheless people do not associate snow with being carried in the clouds.

An interesting upshot of this shitta is that although he held snow is Muktzeh, Rav Moshe did not ascribe any other prohibition to making snowballs. Accordingly, it seems that Rav Moshe would hold that if one gathered snow on Erev Shabbos and set it aside for a snowball fight on Shabbos (within a proper Erev, of course) then one may make and throw those snowballs on Shabbos.[15]

Boneh

On the other hand, many other authorities, although maintaining that snow itself is not Muktzeh, nevertheless held that making snowballs on Shabbos is problematic for other reasons, chief among them "Boneh, Building." The Rambam, cited as halacha by the Mishnah Berurah, discussing cheese-making, rules that anytime one takes separate parts of an item and joins them together to make a new item, is 'similar to Boneh' and therefore prohibited on Shabbos.[16]

Rav Yair Chaim Bachrach (1639-1702) – the renowned Chavos Yair, and on a more contemporary note, Rav Shlomo Zalman Auerbach, and Rav Chaim Kanievsky, as well as others, apply this rule to the formation of snowballs, prohibiting it.[17] Although by making snowballs one is not actually creating something new, he is still giving form to something that was previously not extant, which gives the appearance of and is akin to the halachic definition of building.

Yet, other poskim, including Rav Moshe Feinstein, the Debreciner Rav, and the Nishmas Shabbos disagree,[18] maintaining that the prohibition of Boneh can only apply when one builds something which has at least a minimal semblance of permanence. On the other hand, snowballs, they argue, which have a transient and ephemeral existence lasting a grand total of several seconds from time of throwing, should not be including in the 'building' category. Nonetheless, they concede that when it comes to building snowmen, which generally are meant to stick around until they melt several days later, this would be proscribed due to Boneh.

Risuk

Another potential prohibition involved with making snowballs on Shabbos is "Risuk, Crushing" (or mashing), related to the prohibition of "Sechita, Squeezing" (as in squeezing out juice from a

fruit). The Shulchan Aruch regarding washing one's hands on Shabbos with icy or snowy water, rules that one should be careful not to rub his hands together with the ice as it may crush the ice, causing it to melt and him to unwittingly transgress the prohibition of Risuk.[19]

Several authorities, including the Chavos Yair, and much later, the Debreciner Rav apply this ruling to making snowballs.[20] In the formation of a snowball by applying direct pressure to it, one cannot avoid crushing the snow, causing a bit of it to melt.

In scientific terms, this process of applying pressure is referred to as regelation, where the compression causes a melt and then the release causes freezing of that melt. This is what holds a well-made snowball together.[21] Interestingly, the discoverer of regelation, British scientist Michael Faraday, was born 100 years after the Chavos Yair first discussed this phenomenon regarding the halachic implications of snowball making.

Either way, these Poskim explain, snowball making would be prohibited on Shabbos due to this reason.

On the other hand, Rav Moshe Feinstein and the Nishmas Shabbos disagree.[22] They assert that any minuscule amount of water that is possibly melted while forming a snowball outdoors in the freezing cold is definitely not noticeable, and in no way would this constitute crushing or squeezing out a liquid.

More Melachos?

Other potential prohibitions in the formation of snowballs mentioned by several authorities and rejected by others include: Ma'mar, gathering (i.e. gathering the snow to make the snowballs),[23] Uvda D'Chol, weekday activities,[24] and Soser, destroying (i.e. when the thrown snowball hits its target and consequently falls apart).[25]

So... Can We Build a Shabbos Snowman?

In the final analysis, although there are poskim who give a dispensation to allow young children to make and throw snowballs on Shabbos,[26] nevertheless, the majority of authorities rule that it is assur, period.

In fact, and unknown to most, this contemporary sheilah is not as current as many suspect, as already in the 1690s (!) the Chavos Yair exhorted that if one sees children throwing snowballs at each other on Shabbos, one should attempt to stop them.

The reason why the Chavos Yair's shittah on this topic is mostly unknown is that his full Mekor Chaim on Orach Chaim was only first published in 1982, quite posthumously, by Machon Yerushalayim, even though it was written over 300 years prior (!). It is said that this work was originally intended as a principal commentary to Shulchan Aruch but was withdrawn by the

author when he discovered that other commentaries, most notably the Taz and the Magen Avraham, had already been published.

Back to snowballs and snowmen, practically speaking, although they do not necessarily see eye to eye in their rationales, and there is no clear cut consensus as to the singular reason why it should be prohibited, all the same, the hachra'as haposkim, is indeed that making snowballs, and certainly making snowmen, is assur on Shabbos.[27] Just another reason to play inside on Shabbos when a 'White Winter Wonderland' beckons from the great outdoors or a 'Polar Vortex' comes a-knocking.

This article was written L'iluy Nishmas this author's beloved grandmother, Chana Rus bas Rav Yissachar Dov, R' Chaim Baruch Yehuda ben Dovid Tzvi, and l'zechus Shira Yaffa bas Rochel Miriam v'chol yotzei chaltzeha for a yeshua sheleimah teikif u'miyad!

For any questions, comments or for the full Mareh Mekomos / sources, please email the author: yspitz@ohr.edu.

Rabbi Yehuda Spitz serves as the Sho'el U'Meishiv and Rosh Chabura of the Ohr Lagolah Halacha Kollel at Yeshivas Ohr Somayach in Yerushalayim. He also currently writes a contemporary halacha column for the Ohr Somayach website titled "Insights Into Halacha". http://ohr.edu/this_week/insights_into_halacha/.

Rabbi Spitz's recent English halacha sefer,

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[1] For more on the topic of Asarah B'Teves falling out on Erev Shabbos, see recent article titled 'The Many Facets of Asarah B'Teves'.

[2] Yes, this author is familiar with the 'Coincidences' involved with that memorable Yerushalayim snowstorm. According to the Targum (Rav Yosef) to Divrei Hayamim, 'Yom Hasheleg' - 'The Day of Snow' that Binayahu ben Yehoyada 'smote the lion in the pit' (Shmuel II, Ch. 23: verse 20 and Divrei Hayamim I, Ch. 11: verse 22; see also Gemara Brachos 18a), is none other than Asarah B'Teves! Additionally, since it was a fast, the Haftara read by Mincha included the apropos verse (Yeshaya Ch. 55: verse 10) referring to 'Ka'asher Yai'rade Hageshem Vehasheleg Min Hashamayin', 'when the rain and snow fall from the heavens'.

Furthermore, that day's Daf Yomi was Yoma 35, which includes the famous account of Hillel almost freezing to death on the roof of Shmaya and Avtalyon's Beis Midrash, while trying to listen to their teaching 'Divrei Elokim Chaim', when he could not afford the admission fee. That day was described by the Gemara as an Erev Shabbos in Teves, that a tremendous amount of snow (3 amos) fell upon him from the heavens. Moreover, this incident ostensibly occurred in Yerushalayim, as it is well known that Shmaya and Avtalyon, the Gedolei HaDor, lived in Yerushalayim. [See Mishnayos Ediyus (Ch. 1: 3 & Ch. 5: 6), Gemara Brachos (19a), Shabbos (15a), and Yoma (71b).] Thanks are due to Rabbi Dovid Alexander for his paper on these 'Coincidences'.

[3] See Yalkut Yosef (Kitzur Shulchan Aruch, Orach Chaim, 143: 6), who relates a historical sheilah from a snowstorm on Shabbos in Yerushalayim in 1787 when the shul's entrance was covered with so much snow that it was impossible for anyone to have possibly attended. Therefore, would the tzibbur have to lein a double parsha the next week?

[4] See Shu"t Har Tzvi (Orach Chaim, Ta"l Harim, Soser 1), who mentions a Shabbos snowstorm in Yerushalayim in 1957 that was so bad, that people asked if they may hack and/or shovel the snow and ice off their roofs on Shabbos. On this important topic there are several other contemporary authorities who later addressed this issue. See Shu"t Lev Avraham (49), Shu"t Ba'er Moshe (vol. 1: 28), Shu"t Mishnah Halachos (vol. 4: 45), Shu"t Machazeh Eliyahu (vol. 1: 67), Shu"t Nishmas Shabbos (vol. 4: 247 and 248), Shemiras Shabbos Khilchasah (Ch. 25: 11), Mesores Moshe (vol. 1, pg. 67: 147), and Kuntress Gevuros Akiva (L'fanos Sheleg Beshabbos).

[5] Many children in Yerushalayim and its environs felt gypped from 2019's much hyped "snowstorm," as it was, in a word, 'underwhelming.' Although Israel's North got squarely blanketed, on the other hand, Yerushalayim received maximum a few inches of mostly slush, which melted by morning. Hardly enough for even a snowball fight; a far cry from 2014's culmination of several feet (in some areas) of snow. At press time, the jury was still out on the currently thundering and bombarding "Elpis Storm."

[6] For a fascinating exposition on the various and varied roles snow plays in halacha, see Rav Shlomo Yosef Zevin's Le'ohr Hahalacha (Chapter 'Hasheleg', ppg. 232 - 239). Thanks are due to Rabbi Eliezer Brodt, author of Bein Kesseh Le'Esor and Likutei Eliezer, for providing this author with this invaluable source.

[7] This topic was covered at length in a previous article titled 'The Curious Case of the Karpef'.

[8] Tosafos (Beitzah 2a s.v. ka and Eruvin 46a s.v. kol).

[9] Eruvin (45b - 46a).

[10] See for example Meiri (Eruvin 45b s.v. me'achar), Teshuvos Hagaonim (242), Beis Yosef (Orach Chaim end 310; citing the Shibolei Haleket (85) and Rav Tzemach Gaon (Halachos

Pesukos 146), Magen Avraham (Orach Chaim 397: 13), Maharsham (Daas Torah, Orach Chaim 340: end 1), Mishnah Berurah (338: 30; citing the Zechor L'Avraham), and Kaf Hachaim (Orach Chaim 310: 52 and 397: 56), and many later authorities. Although the Pri Megadim (Pesicha Koleles to Hilchos Yom Tov, Ch. 3: 2, Dinei Muktzeh 29) implies that rain is muktzeh, this is not the normative halacha and many 'answer up' his shitta explaining that he was simply referring to the hava amina of the Gemara to prove a point about Nolad [See Nezer Yisrael (38: 3, 28), Minchas Shabbos (on Kitzur Shulchan Aruch, 80: 56 & Shiyurei Hamincha ad loc. 19), Toldos Shmuel (pg. 197b), Shu"t Har Tzvi (ibid.), Shu"t Ba'er Moshe (vol. 1: 20), and Shu"t Nishmas Shabbos (vol. 4: 249 s.v. u'mitzad).] Although, the Mishnah Berurah (310: 32) rules like the Chayei Adam (vol. 2, 65: 63, Pen 8), that water that drips from trees on Shabbos during Nissan (possibly sap) is Nolad and therefore Muktzeh, this does not affect his ruling regarding rain, which is not considered Nolad, nor Muktzeh, as one does not associate water with coming from trees, and thus in that specific scenario is akin to a new creation on Shabbos, as opposed to rain.

[11] Chavos Yair (Mekor Chaim, Orach Chaim 320: 11), Even HaOzer (Orach Chaim 363), Maamar Mordechai (Shu"t 2), and the Butchatcher Rav (Eshel Avrohom, Orach Chaim 312: Tinyana). Although the words of the Chasam Sofer (Shu"t Orach Chaim 89) regarding broken pieces of ice that one does not need (i.e. he only needed the water underneath) might imply the opposite, nevertheless, see She'arim Metzuyanin B'Halacha (80: 19) based on the Maharsham (Daas Torah, Orach Chaim 320: 10), Shu"t Machazeh Eliyahu (vol. 1: 68, end 1, in the brackets), and Sefer Hanosein Sheleg (Kuntress Hashu"t: footnote 8), who explain that this does not apply to snow, nor to our ubiquitous ice cubes, and maintain that even according to the Chasam Sofer neither would be considered Muktzeh.

[12] Minchas Shabbos (on Kitzur Shulchan Aruch 80: 56), Rav Tzvi Pesach Frank (Shu"t Har Tzvi ibid.), Rav Shlomo Zalman Auerbach (as per Shemiras Shabbos Kehilchasah Ch. 16: 45, Shulchan Shlomo 310: 26, 2, and Sefer Tiltulei Shabbos pg. 165, footnote 10), Rav Yosef Shalom Elyashiv (as per Shalmei Yehuda Ch. 13: 19, pg. 203 and Orchos Shabbos vol. 2, Ch. 19: footnote 259), the Debreciner Rav (Shu"t Ba'er Moshe vol. 1: 20), She'arim Metzuyanin B'Halacha (80: 19), Rav Ovadia Yosef (cited in Yalkut Yosef, Shabbos vol. 2, pg. 498: footnote s.v. ul'inyan), Rav Chaim Kanievsky (cited in Sefer Hanosein Sheleg, Kuntress Hashu"t 7; and not as cited in Shu"t Alei Siach pg. 134: 51; however it is possible that was simply referring to making snowballs as assur), the Rivevos Efraim (Shu"t vol. 1: 223, 1), the Nishmas Shabbos (Shu"t vol. 4: 247 and 249), and Rav Pesach Eliyahu Falk (Shu"t Machzeh Eliyahu vol. 1: 68). However, see Sefer Tiltulei Shabbos (pg. 13: 13) [as well as Orchos Shabbos vol. 2, Ch. 19: footnote 259, which only quotes the Teshuva from Sefer Tiltulei Shabbos pg. 13: 13, and not the psak that appears later in the sefer] who cites a Teshuva from Rav Shlomo Zalman Auerbach, where he held that it is 'not pashut to be lenient' with the issur of nolad regarding snow that actually fell on Shabbos and Yom Tov. The Shulchan Shlomo (ibid.) cites both psakim lemaaseh in his understanding of Rav Shlomo Zalman's opinion, and distinguishes between snow that fell on Shabbos which is muktzah, and snow that fell prior to the onset of Shabbos, which is not.

[13] Shu"t Igros Moshe (Orach Chaim vol. 5, 22: 37), Sefer Tiltulei Shabbos (pg. 165: footnote 10; even referring to snow that fell before Shabbos), and Orchos Shabbos (vol. 2, Ch. 19: footnote 259), and not as quoted in Sefer Hilchos Shabbos of Rav Shimon Eider (pg. 120: footnote 331). On the other hand, Rav Moshe's son Rav Dovid Feinstein is quoted (Shu"t Videbarta Bam vol. 2: 147 s.v. v'shamaati) as maintaining a more nuanced position. He explains that there is no 'mesorah' as to whether snow is truly Muktzah, and as there are dogs nowadays that would eat / drink snow, perhaps it may be considered 'fit for animals.' He concludes that "b'makom hatzorech yeish lomar" that snow is not Muktzah pertaining to Tiltul.

[14] The issue of Nolad on Shabbos is complicated. This is actually one notable inyan which is stricter on Yom Tov than Shabbos. Although in the Gemaros dealing with this topic [Beitzah and Eruvin (ibid.), as well as Shabbos (29a)] the level of 'Nolad' necessary to prohibit something that came into existence on Shabbos (a real existential quandary, you might say) is a machlokes R' Shimon and R' Yehuda, the halachic bottom line is that it needs to be classified as a 'Nolad Gamur' to be proscribed on Shabbos. See Rashi and Tosafos (Beitzah 2a s.v. ka), Rambam (Hilchos Shvisas Yom Tov, Ch. 1: 19), and Rema (Orach Chaim 495: 4). See also Shemiras Shabbos Kehilchasah (vol. 1, pg. 359, footnote 159 and further) who breaks this topic down and categorizes the different types of Nolad and their applications. On the other hand, in a fascinating counter-point and novel approach, the Ohr Somayach (Hilchos Yom Tov, Ch. 2, Halacha 3 s.v. lachein) opines that if one would be able to create something out of thin air on Shabbos, it would be permitted and not Muktzah, as this 'Super Nolad Gamur' could not have possibly been considered "in this world at all" to possess the status of Muktzah.

[15] See Mesores Moshe (vol. 1, pg. 68: 148).

[16] Rambam (Hilchos Shabbos, Ch. 7: 6), cited as halacha by the Mishnah Berurah (319: 63).

[17] See Mekor Chaim (Orach Chaim 320: 11), Rav Shlomo Zalman Auerbach (cited in Shemiras Shabbos Kehilchasah and Shulchan Shlomo ibid.), Rav Chaim Kanievsky (cited in Sefer Hanosein Sheleg, Kuntress Hashu"t: 6 and 27), and Shu"t Rivevos Efraim (ibid., who writes, quoting the Menucha Nechona, that 'issuro hu meshum etzem ha'asayah', implying that the issue is Boneh). Although they acknowledge the differences between cheese-making and snowball forming and agree that making snowballs can't be considered actual building and one would not violate Boneh on a Deoraysa level [see Shemiras Shabbos Kehilchasah (Ch. 16: footnote 117)], nevertheless, Rav Shlomo Zalman referred to making snowballs as 'an issur lechatchilla (of Boneh) since snow is not food,' and Rav Chaim Kanievsky wrote 'ra'ui l'hizaher d'mechzi k'Boneh.'

[18] Rav Moshe Feinstein (Mesores Moshe ibid.), the Debreciner Rav (Shu"t Ba'er Moshe vol. 6: 30) and Shu"t Nishmas Shabbos (ibid.). See also the Ba'er Moshe's teshuva printed in Sefer Piskei Hilchos Shabbos (vol. 2, pg. 59, Question 6) who concludes that there is no better to allow building a snowman on Shabbos.

[19] Shulchan Aruch (Orach Chaim 320: 11). Although there are poskim who do permit this, [see Magen Avrohom (ad loc. 16), Ba'er Heitev (ad loc. 15), and Aruch Hashulchan (ad loc. 25; who concludes 'tzarich iyun l'dina')], nevertheless, the Kitzur Shulchan Aruch (80: 14), Ben Ish Chai (Year 2: Parshas Yisro 9), and Mishnah Berurah (Biur Halacha ad loc. s.v. yizaher) conclude 'ain lehakelb'zeh,' as 'many many Rishonim' cite this as well. Regarding the issue of crushing and melting ice on Shabbos ('merazkin es hasheleg') in order to make its water flow, which the Gemara (Shabbos 51b) states is prohibited on Shabbos, there is much debate among the Rishonim and Acharonim whether this proscription is due to 'Nolad' or to 'Sechita.' See Rashi, Tosafos, Rashba, Rosh (all ad loc.), Ran (ad loc. 23b in the Rif's pagination), Shibolei Haleket (Shabbos 85), Rambam (Hilchos Shabbos Ch. 21: 13; and Maggid Mishnah ad loc.), Sefer HaTerumah (235), Beis Yosef (Orach Chaim 318: 16 and 320: 9), Shu"t Panim Meiros (vol. 1: 84 s.v. v'attah), Tur, Shulchan Aruch, Rema, and main commentaries to Orach Chaim 318:16 and 320:9, Shulchan Aruch Harav (Orach Chaim 320: 16), Chayei Adam (vol. 2, 14: 11 and 20: 7 and 20), Ben Ish Chai (ibid.), Eglei Tal (Maleches Dush 18: 36, 19 and 25 – 27; and ad loc. 37, 3), Shvisas HaShabbos (Maleches Dush 19 and 20), Mishnah Berurah (320: 35), Aruch Hashulchan (ad loc. 21 – 25), and Kaf Hachaim (ad loc. 63). Perhaps this topic will be addressed in a more comprehensive manner in a future article.

[20] Mekor Chaim (ibid.) and Shu"t Ba'er Moshe (ibid.). Actually, the Chavos Yair refers to it as "Dush, Threshing." However, as the Nishmas Shabbos (ibid.) and Me'ohr Hashabbos (vol. 3: Ch. 13, 59, and extensive footnote) explain, he could not have meant threshing, which does not seem to apply to snowballs [as the Shemiras Shabbos Kehilchasah (Ch. 16: footnote 117) points out and concludes 'tzarich iyun']. Rather, they maintain he was referring to Risuk, which is a type of Sechita, which in itself is a Toldah of 'Dush' [see Rambam (Hilchos Shabbos Ch. 8: 10) and Aruch Hashulchan (Orach Chaim 320: 3)].

[21] Thanks are due to David Lederman for pointing this out to me.

[22] Mesores Moshe (vol. 1, pg. 67: 147 s.v. ulgabei) and Shu"t Nishmas Shabbos (ibid.).

[23] See Minchas Ish (Ch. 11: 23, footnote 38). However, the Ba'er Moshe (Shu"t ibid.) rejects this out of hand as this only applies to 'Gidulei Karka', or at least 'Makom Gidulo,' neither of which seem to apply to snow [see Daas Torah (Orach Chaim 340: 9) and Mishnah Berurah (340: 35 and 36)].

[24] See Rabbi Shimon Eider's Sefer Hilchos Shabbos (pg. 120: footnote 331) who posits that making snowballs should be 'Uvda D'Chol'. However, in this author's estimation, as no one else seems to cite such logic, it seems that this would be a novel approach. Additionally, we find that when something is prohibited for this reason or a similar one, nevertheless, if it is something that is an 'oneg' or 'hana'as guf' for the one performing the action, it is permitted. For example, although running and jumping are technically prohibited on Shabbos, they are both nonetheless fully permitted for children to do, as that is their 'oneg Shabbos' [see Shulchan Aruch (Orach Chaim 301: 1 and 2), Aruch Hashulchan (ad loc. 44), and Mishnah Berurah (ad loc. 5 and 6 and Shaar Hatziyun 3, 6, and 7); Rav Yaakov Kamenetsky (Emes L'Yaakov on Tur and Shulchan

Aruch, Orach Chaim 328: footnote 377) even applied this distinction to one who is sunbathing simply for 'Hana'as Gufo']. The same would seemingly pertain to children and their snowball fights. What greater fun do children have on a Snow Day?

[25] See Shemiras Shabbos Kehilchasah (Ch. 16: footnote 117) who raises this issue, but cites Rav Shlomo Zalman Auerbach as ruling that it is not applicable, as once one throws a snowball he does not care about it breaking apart. Furthermore, even when thrown, it is not one's kavanna to davka destroy the snowball. The Nishmas Shabbos (ibid.) expresses similar sentiments. Additionally, as making snowballs is not considered 'Binyan Gamur,' even according to those who consider it a type of Boneh, it would seem difficult to label a snowball's falling apart as Soser, as by definition, that Melacha can only apply (as a reverse Malacha of sorts) when Boneh does.

[26] See Shu"t Ba'er Moshe (vol. 6: 30) and Shu"t Nishmas Shabbos (vol. 4: 249). However, see the Ba'er Moshe's teshuva printed in Sefer Piskei Hilchos Shabbos (vol. 2, pg. 59, Question 6) where he writes a stronger lashon, that certainly it is 'assur behechlet' for one who is 13 to make snowballs on Shabbos, and that one should certainly be machmir from age 9 or 10 to be properly mechanech the children so there should not come to be 'zilzul' of Shabbos. This author has also recently seen printed that Rav Dovid Feinstein allows children to make snowballs as well. However, he qualifies his hetter, as only allowing children shelo higiya l'chinuch to play in the snow on Shabbos (see Rabbi Yitzchok Frankel's Kuntress Yad Dodi, Hilchos Shabbos, Muktzeh, Question 10).

[27] Aside for the teshuvos previously mentioned, this is how many contemporary sefarim on Hilchos Shabbos conclude, regardless of the reason presented, including Shemiras Shabbos Kehilchasah (Ch. 16: 45), Me'ohr Hashabbos (vol. 3, Ch. 13: 59), Orchos Shabbos (vol. 1, Ch. 8: 39), Sefer Hilchos Shabbos (pg. 120: 14), The 39 Melachos (vol. 4, pg. 1092), Shabbos Kehalacha (Tza'atzuim 51), and Uveyom HaShabbos (Ch. 10: 16).

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Disclaimer: This is not a comprehensive guide, rather a brief summary to raise awareness of the issues. In any real case one should ask a competent Halachic authority.

L'iluy Nishmas the Rosh HaYeshiva - Rav Chonoh Menachem Mendel ben R' Yechezkel Shraga, Rav Yaakov Yeshaya ben R' Boruch Yehuda.