

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

**Sub-Committee of Experts on the Globally Harmonized
System of Classification and Labelling of Chemicals**

4 December 2015

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Geneva, 9 – 11 December 2015

Item 4 (b) of the provisional agenda

**Hazard communication issues: improvement of annexes 1 to 3
and further rationalization of precautionary statements**

Alternative precautionary statement for disposal of explosives

Transmitted by the Sporting Arms and Ammunition Manufacturers' Institute

1. Based on a request from France in UN/SCETDG/48/INF.36 / UN/SCEGHS/30/INF.11, the explosives working group of the TDG Sub-Committee reviewed the proposal from Sweden ST/SG/AC.10/C.4/2015/9 for further modifications to P502. Although this had been decided at the last meeting of the SCEGHS, and was previously discussed before that, it was a new topic of discussion for the working group.
2. Many explosives experts were particularly concerned that the inclusion of text about “recovery or recycling” could create unsafe situations, as for explosives these operations may only be undertaken safely by specialists. Further, the term disposal may be considered for purposes of explosives to include recovery or recycling, when appropriate.
3. As will be shown in their report, the explosives working group found the options proposed in ST/SG/AC.10/C.4/2015/9 to be difficult to read and comprehend and it recommends that a separate precautionary statement for explosives (P503) be developed. SAAMI has undertaken to provide this proposal which would implement the views of the working group.
4. The explosives working group particularly benefitted from the participation of the expert from Sweden. It was mentioned that Sweden’s original idea was already a new P503 for explosives (see UN/SCEGHS/25/INF18 from the 25th session), and the current proposal from SAAMI is therefore in line with Sweden’s initial thoughts. The expert from Sweden explained that the reason that Sweden did not pursue that line was a belief that a modification of the existing P502 would be a faster way to achieve a functional P-statement for disposal of explosives. Sweden stated that such a P-statement is a requirement for all products supplied to the general public, including explosives, according to the European CLP-regulation, as further explained in Sweden’s previous papers (UN/SCEGHS/25/INF18 and ST/SG/AC10/C4/2015/5e).
5. The current paper from Sweden ST/SG/AC.10/C.4/2015/9 is just a minor amendment to the modified P502 already decided by the SCEGHS at its 29th session (see the report, ST/SG/AC.10/C.4/58), intended to clarify that the word disposal is mandatory when applying P502 to explosives. This is because disposal – not recovery/recycling - would be the normal way to get rid of expired/non-functioning explosives.
6. In order to avoid referring to recovery and recycling for explosives, which could lead to unsafe handling and which is not the normal way to dispose of explosives, SAAMI

proposes to create a new precautionary statement solely for explosives, similar to that of P502 but omitting those words. Consequently, P502 would then have to be returned to its original wording as in the 6th revised edition of the GHS, since it will then again only apply to chemicals classified as hazardous to the ozone layer. This will be more effective for explosives and will be more comprehensible for chemicals hazardous to the ozone layer.

Proposal

7. Add the following new precautionary statement to Table A3.2.5 of Annex 3 Section 2 of the GHS.

Code (1)	Disposal precautionary statements (2)	Hazard class (3)	Hazard category (4)	Conditions for use (5)
P503	Refer to manufacturer/supplier/... for information on disposal.	Explosives (Chapter 2.1)	Unstable explosives and Divisions 1.1, 1.2, 1.3, 1.4, 1.5	... Manufacturer/supplier or the competent authority to specify appropriate source of information, in accordance with local/regional/national/international regulations as applicable

8. Revise P502 back to the text of the GHS sixth revised edition in Table A3.2.5 of Annex 3 Section 2 of the GHS:

Code (1)	Disposal precautionary statements (2)	Hazard class (3)	Hazard category (4)	Conditions for use (5)
P502	Refer to manufacturer or supplier for information on recovery or recycling	Hazardous to the ozone layer (Chapter 4.2)	1	