**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**   **7 December 2015**

Thirtieth session
Geneva, 9 –11 December 2015
Item 4 (c) of the provisional agenda
Hazard communication issues:
Improvement of annexes 1 to 3 and further rationalization of precautionary statements

Further refinement of the precautionary statement for explosives

Transmitted by the expert from the United States

Background

1.   The United States thanks the expert from Sweden for his further attempts in document ST/SG/AC.10/C.4/2015/9 to refine the precautionary statement for explosives adopted by the Sub-Committee last session (see the annex to the report of the Sub-Committee on its 29th session, ST/SG/AC.10/C.4/58).

Comments

2.   However, we believe there are still problems with both of the new options it proposes. In Option 1, as Sweden notes, there is the possibility that the user might believe that the text "[/...]" must appear in the precautionary statement. In Option 2, the text "[/...]" is not addressed in the conditions of use for explosives, which could also create questions in the user's mind. In general, both of Sweden's options and the version of P502 adopted last session are much more complicated than the other precautionary statements in Table A.3.2.1.

3.   In our view, these problems arise from the effort to cover both the explosive hazard and the hazardous to the ozone hazard under P502. We think the better course is to revert to the P502 that appears in Rev. 6 for chemicals that are hazardous to the ozone layer, and adopt a new precautionary statement P503 that addresses the concerns that led Sweden to make the proposal in the first place.

4.   In addition, the United States also notes that the text adopted in the last session refers to information about the "disposal, recovery or recycling" of explosives. Our fireworks expert inform us that recovery and recycling of unexploded or defective fireworks can be a common occurrence, and it is therefore important that the precautionary statement refer to these situations. The United States therefore includes all three operations in its proposed P503, even though only disposal was addressed in the precautionary statement that appeared in the Rev. 6 versions of P501.

Proposal

5.   The United States proposes that P502 revert to the language that currently appears in Rev. 6, and that a new P503 be adopted as follows:

Code (1)	Disposal precautionary statements (2)	Hazard class (3)	Hazard category (4)	Conditions for use (5)
P503	**Refer to manufacturer or supplier/… for information on disposal, recovery, or recycling.**	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