



**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****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 precautionary statement P502 for
explosives****Transmitted by the expert from Sweden¹**

1. At the 29th session of the Sub-Committee, a proposal was put forward by the expert from Sweden regarding the use of precautionary statement P502 for the hazard class “Explosives” (see document ST/SG/AC.10/C.4/2015/5).
2. As a result of the comments made by other experts, the proposal was redrafted in the margins of the session and a modified proposal was circulated as INF.20. The proposal was subsequently further amended during the session, and a somewhat altered wording was finally accepted and adopted by the Sub-Committee (see the annex to the report of the Sub-Committee on its 29th session, ST/SG/AC.10/C.4/58).
3. During the discussion, it was proposed to further clarify the conditions for use for P502 for explosives by adding an instruction specifying that the word “disposal” should always be used when applying P502 to explosives. However, after lengthy discussions it was felt that it was better not to further change the proposal at that stage. The expert from Sweden now returns with a proposal for the further refinement of the conditions for use of P502 for explosives.
4. Following the amendments adopted by the Sub-Committee at the 29th session, P502 reads as follows: “Refer to manufacturer or supplier [/....] for information on [disposal.]”

¹ In accordance with the programme of work of the Sub-Committee for 2015–2016 approved by the Committee at its seventh session (see ST/SG/AC.10/C.3/92, paragraph 95 and ST/SG/AC.10/42, para. 15).

recovery or recycling”. The condition for use applicable to the hazard class “Hazardous to the ozone layer” is “Text in square brackets not to be used for hazardous to the ozone layer”. At first glance, the corresponding condition for use to be inserted for explosives would be: “– *Text in square brackets to be used for explosives*”, in accordance with the standard phrasing used in the GHS for these situations. This is option 1.

5. However, indicating that the text in square brackets should be used for explosives may lead to some confusion since both the slash and the three dots are within square brackets in the phrase as well. Therefore, a user may be led to believe that “/...” must also appear in the statement, thus reading: “Refer to manufacturer or supplier/... for information on disposal, recovery or recycling”. To avoid any misinterpretation, the expert from Sweden additionally suggests the following alternative condition for use: “– *disposal*” to be used for explosives”. This is option 2.

6. The expert from Sweden looks forward to the Sub-Committee’s views on the proposed two options as shown below.

Proposal

Option 1

7. Insert the following condition for use “–*Text in square brackets to be used for explosives*” for Explosives in Table A3.2.1 of Annex 3 Section 2 of the GHS, as amended at the 29th session of the Sub-Committee (refer to ST/SG/AC.10/C.4/58, Annex). *New inserted text is shown in bold, underlined:*

| 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 [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 <u>- Text in square brackets to be used for explosives</u> |
| | | Hazardous to the ozone layer (Chapter 4.2) | 1 | - <i>Text in square brackets not to be used for hazardous to the ozone layer</i> |

Option 2

8. Insert the following condition for use “–*disposal*” to be used for explosives” for Explosives in Table A3.2.1 of Annex 3 Section 2 of the GHS, as amended at the 29th session of the Sub-Committee (refer to ST/SG/AC.10/C.4/58, Annex). *New inserted text is shown in bold, underlined:*

| 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 [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 – <u>“disposal” to be used for explosives</u> |
| | | Hazardous to the ozone layer (Chapter 4.2) | 1 | – <i>Text in square brackets not to be used for hazardous to the ozone layer</i> |