

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

28 June 2013

Twenty-fifth session

Geneva, 1 – 3 July 2013

Item 3 (d) of the provisional agenda

Hazard communication issues: Miscellaneous

Discussion paper on the need for a new precautionary statement for pyrotechnic articles

Transmitted by the expert from Sweden

Background

1. The GHS contains a large number of precautionary statements meant to aid the users of chemicals in the safe handling of the product. They are supposed to be displayed on the product labels and/or in the safety data sheets or other product information.
2. Of the many precautionary statements available, only two concern disposal: P501 – “Dispose of contents/container to ...” and P502 – “Refer to manufacturer/supplier for information on recovery/recycling.” While the GHS allows P501 to be used for virtually all classifications, P502 is only allowed to be used for a single classification – Hazardous to the ozone layer.

Problem

3. While the GHS mainly comprises chemical substances and mixtures, the hazard class Explosives covers also explosive articles. Amongst those articles are pyrotechnic articles, e.g. fireworks of various kinds.
4. Malfunctioning or expired explosive articles must be handled with special care and cannot be disposed of in the same way as most other chemicals. This also goes for fireworks and other pyrotechnic articles. While the majority of explosive articles are only handled by professionals, many fireworks are also handled by the general public.
5. It is important that the general public receives information on how to properly dispose of their potentially hazardous waste. The EU implementation of the GHS, i.e. the CLP-Regulation, requires that substances, mixtures and articles covered by the Regulation, including explosive articles, are labelled with a Precautionary Statement for disposal if sold to the general public.
6. Neither of the currently available precautionary statements for disposal, P501 or P502, are however able to describe how to dispose of malfunctioning or expired pyrotechnic articles. Moreover, both of them assume that there is at least a container left to dispose of, which is not true for many fireworks that do function.

Discussion

7. For the above reasons, Sweden wishes to open a discussion on the need for and the suitable wording of a new Precautionary Statement for the disposal of malfunctioning or expired explosive articles handled by the general public – especially fireworks.

8. As the required or recommended ways to dispose of malfunctioning or expired fireworks will no doubt differ in different countries or regions, it becomes a challenge to find a suitable wording. The following wording is proposed to start the discussions. It is casted for insertion in Table A3.2.5 of Annex 3 Section 2 in the GHS. Sweden highly welcomes comments and reflections.

| <i>Code</i> <i>(1)</i> | <i>Disposal precautionary statements</i> <i>(2)</i> | <i>Hazard class</i> <i>(3)</i> | <i>Hazard category</i> <i>(4)</i> | <i>Conditions for use</i> <i>(5)</i> |
|---------------------------|--|-----------------------------------|--------------------------------------|--|
| P503 | Dispose of/Return malfunctioning or expired article to ... | Explosives | Divisions 1.3, 1.4 | Explosive articles ... Manufacturer/supplier or the competent authority to specify appropriate way of or receiver for disposal. |

9. Pyrotechnic articles sold to the general public are normally classified as Division 1.3 or 1.4. However, it could be discussed whether a precautionary statement for disposal of malfunctioning or expired explosives may be useful also for other types of products.

| <i>Code</i> <i>(1)</i> | <i>Disposal precautionary statements</i> <i>(2)</i> | <i>Hazard class</i> <i>(3)</i> | <i>Hazard category</i> <i>(4)</i> | <i>Conditions for use</i> <i>(5)</i> |
|---------------------------|--|-----------------------------------|--------------------------------------|--|
| P503 | Dispose of/Return malfunctioning or expired product to ... | Explosives | Divisions 1.1, 1.2, 1.3, 1.4, 1.5 | ... Manufacturer/supplier or the competent authority to specify appropriate way of or receiver for disposal. |