

# The perspective from a Downstream User – Explosive sector group experiences

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# Agenda

- Explosives – overview
- Explosives – REACH experience
- Supply chain communication
- Authorization – key issues for explosives

# Explosives - overview

- Propellants
  - Solid, liquid types
  - Used in ammunition for guns and for rockets
- Detonators
  - Electric, non-electric
  - Used in mining, building and construction, automotive and aerospace industries (Cartridge Actuated Devices - CADs)
- All kinds of explosives, used both for civilian and military uses

# Use of explosives - examples



**Mortar bombs  
(military use)**



**CADs for aerospace / automotive industry**



**Gun/rifle ammunition (military and security forces)**



**Plastic shotgun ammunition (sporting/hunting)**

# Use of explosives - examples



**Non-electric detonator  
(military/civilian use)**



**F 18 fighter jet with CADs  
for ejector seats**



**Artillery shell (military use)**



**Gun powder (propellant)  
for cartridges**

# Explosives -overview

- There was already a substitution in the past
  - Mercury based mixtures used
    - Very easy to manufacture
    - Big risk of unexpected explosions during manufacture and use
- Traceability
  - Each piece of explosive must have unique number

# Explosives – overview

- Explosives are already extremely regulated in the EU – why authorization?
- NATO standards for composition of ammunition
  - STANAG 4170, AOP-7, MOPI etc.
  - Agreed within NATO members; could not be changed
- Standards used also in civilian sector

# Explosives – REACH experience

- SVHC substances
  - some substances already on Annex XIV
  - Another substances in CL
  - More substances will come with next update of CL
- Registrations made for several substances (imports, manufacture)
  - However many of them for tonnage band <10 tpa, so no CSR generated
- Some substances manufactured below 1tpa



# Supply chain communication

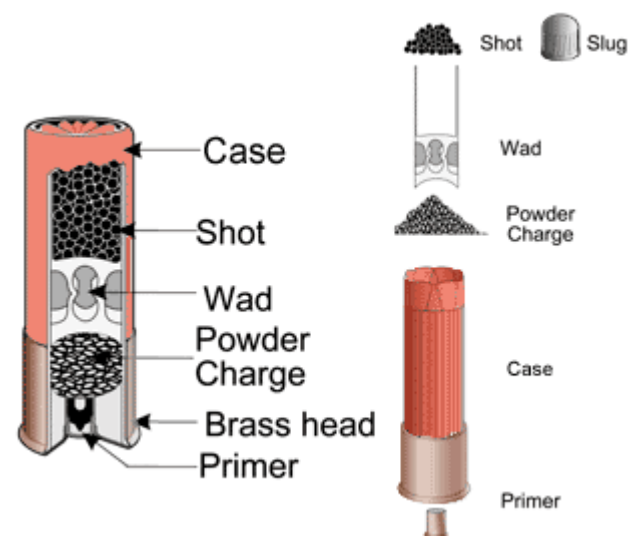
- Uses and descriptors sent to suppliers in 2009 for 2010 registration deadline
- Vague answers from suppliers till the end of 2010 – no clear support for explosives
  - Maybe due to very low tonnage
  - Issues with „certificated suppliers“
    - One supplier refused to register one substance in November 2010; necessity to fill the stock with raw material in order to avoid shut-down of the plant

# Supply chain communication

- Suppliers contacted if they want to authorize in 2011; no clear answers or reply of „what is authorization?“
  - Majority of substances imported from non-EU
  - Consumption of raw materials is relatively low; one piece weighs only grams and contains dozens of substances
- Decision made to apply for authorization at DU level for key substances

# Authorization – key issues for explosives

- Complexity of the supply chain
  - Manufacturers do not know if the final product will be sold to military/security forces or to civil sector
  - DU deals with final products, no contact during use, only after explosion
- Issue article vs. „mixture in the container“ still remains
  - Importers claim we have articles → no authorization needed



# Authorization – key issues for explosives

- Military/security forces not involved in REACH
  - Propellants for reloading
- Professional/consumer use?
  - Soldiers, hunters, sporting shooters
  - Differences within Member States
- DU application for authorization
  - According to current guidelines, only one supplier is covered upstream the supply chain

# Authorization – key issues for explosives

- Preparation of the dossier and CSR in case of manufacture/import <1 tonne per year
  - Lack of time
- Analysis of Alternatives
  - no substitution possible due to NATO standards
- Authorization for unlimited period?

Thank you for your attention

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