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Table of Contents

- 1 Introduction.....5**
- 2 Structure of the Guideline5**
- 3 Minimum requirements5**
 - 3.1 Indicating presence of explosive precursors listed in the EU Regulation 2019/1148.....5
 - 3.1.1 Regulation Type Code (BMS ID 3070)5
 - 3.1.2 Regulation Compliance Indicator (BMS ID 3074).....6
 - 3.1.3 Examples of indicating reportable and restricted explosive precursors.....6
- 4 Additional requirements.....7**
 - 4.1 Identifying the Regulation 2019/1148.....7
 - 4.1.1 Regulatory Act (BMS ID 3071)7
 - 4.1.2 Regulatory Agency (BMS ID 3072).....7
 - 4.1.3 Examples of identifying the Regulation 2019/1148.....8
 - 4.2 Indicating explosive precursor8
 - 4.2.1 Regulation Level Code Reference (BMS ID 6211)8
 - 4.2.2 Indication of concentration thresholds (BMS ID 3075)9
 - 4.3 Indicating precise concentration of the explosive precursor9
 - 4.3.1 Chemical Ingredient Scheme (BMS ID 3182).....9
 - 4.3.2 Chemical Ingredient Identification (BMS ID 3188).....9
 - 4.3.3 Chemical Ingredient Concentration (BMS ID 3184).....10
 - 4.4 Indicating maximum amount allowed for sale10
- 5 Annex A: European code list for regulationLevelCodeReference.....10**
- 6 Annex B: List of affected product categories (GPC).....11**

1 Introduction

EU Regulation 2019/1148 on the marketing and use of explosives precursors establishes harmonised rules concerning the making available, introduction, possession and use of substances or mixtures that could be misused for the illicit manufacture of explosives, with a view to limiting the availability of those substances or mixtures to members of the general public, and with a view to ensuring the appropriate reporting of suspicious transactions throughout the supply chain.

GS1 standards, services and solutions can help companies to comply with requirements concerning communication of product data that is required in order to comply with requirements of the regulation towards trading partners.

This document aims at providing a harmonized way of using GDSN to exchange all required information to comply with the regulation between trading partners. The objective here is to specify the data to be exchange between data pools. Each Data pool is responsible for mapping the right message.

This guidance is a technical document and is not intended to provide a legal interpretation of the Regulation 2019/1148, the ultimate official interpretation of which is the exclusive reserve of the judicial powers, i.e. the national courts and the Court of Justice of the European Communities.

2 Structure of the Guideline

Implementation of the Regulation 2019/1148 in some markets can be more strict than in the others. Therefore, this guideline is divided into two parts:

- Chapter 3 **Minimum requirements** describes how to exchange information required in all EU markets that use GDSN when implementing EU Regulation 2019/1148.
- Chapter 4 **Additional requirements** describes how to exchange extra information that is only required in some of the markets.

Recommendation for international suppliers is to use attributes listed in both chapters. This will make product data related to the Regulation 2019/1148 accepted in any EU market.

3 Minimum requirements

3.1 Indicating presence of explosive precursors listed in the EU Regulation 2019/1148

3.1.1 Regulation Type Code (BMS ID 3070)

- **GDSN name:** regulationTypeCode
- **GDSN Module:** RegulatedTradeItemModule
- **ADB definition:** The code indicating a regulation. Used in conjunction with Regulation Compliance Indicator.
- **Instruction:** Use this attribute to indicate whether a product is subject to either limits in sale (2019/1148 – ANNEX I) or “only” subject to reporting (2019/1148 – ANNEX II). This attribute shall be used together with attribute isTradeItemRegulationCompliant in order to indicate it.
 - Code EXPLOSIVES_PRECURSORS_REGISTRATION represents **restricted explosive precursors** from 2019/1148 – Annex I in concentration higher than the threshold (limit value) mentioned in Annex I. If its concentration is equal to or lower than the threshold, then the code ‘EXPLOSIVES_PRECURSORS_REPORTING’ should be used.
 - Code EXPLOSIVES_PRECURSORS_REPORTING represents **reportable explosive precursors** from 2019/1148 – Annex II and precursors from 2019/1148 Annex I in concentration equal to or lower than the threshold (limit value) mentioned in Annex I.

- Remark:** If codes EXPLOSIVES_PRECURSORS_REGISTRATION and EXPLOSIVES_PRECURSORS_REPORTING are not used at all, it means that there are no explosive precursors in the product or it is a homogeneous mixture of more than 5 ingredients in which the concentration of each substance listed in Annex I or II is below 1% w/w¹. However, validation rules in some markets might require these two codes to be always populated for GPC bricks (product categories) listed in Annex B. Supplier is then required to use attribute isTradeItemRegulationCompliant to indicate whether the product is or is not containing substances from 2019/1148 Annex I or II. Such validation rules should only exist for base units (when isTradeItemABaseUnit equals true).

Important note for data recipients: always check if there is value NOT_APPLICABLE in isTradeItemRegulationCompliant when processing regulationTypeCode attribute. If there is such a value, product does not contain explosive precursor. Even when isTradeItemRegulationCompliant is not used in your market, foreign suppliers might use it to indicate that product does not contain explosive precursors.

- Example:** see table with examples in chapter 3.1.3.

3.1.2 Regulation Compliance Indicator (BMS ID 3074)

- GDSN name:** isTradeItemRegulationCompliant
- GDSN Module:** RegulatedTradeItemModule
- ADB definition:** Signifies when a trade item is/is not compliant or not applicable to a regulation.
- Instruction:** Use this attribute to indicate whether the product is subject to either limits in sale (2019/1148 – ANNEX I) or “only” subject to reporting (2019/1148 – ANNEX II). This attribute should be used together with attribute regulationTypeCode in order to indicate it.
 - Code TRUE indicates the product **contains** some of the explosive precursors represented by code in regulationTypeCode.
 - Code NOT_APPLICABLE indicates the product **does not contain** any of the explosive precursors represented by code in regulationTypeCode.
- Remark:** Use only codes NOT_APPLICABLE or TRUE. Some markets also require attributes regulatoryAct and regulatoryAgency to be provided together with this attribute. See chapter 4.1 for more details. Validation rules in some markets might require to always populate this attribute for GPC bricks (product categories) listed in Annex B. Such validation rules should only exist for base units (when isTradeItemABaseUnit equals true).
- Example:** see table with examples in chapter 3.1.3.

3.1.3 Examples of indicating reportable and restricted explosive precursors

Attribute values	Business meaning
regulationTypeCode = EXPLOSIVES_PRECURSORS_REGISTRATION regulationTypeCode = EXPLOSIVES_PRECURSORS_REPORTING isTradeItemRegulationCompliant = NOT_APPLICABLE	Product does not contain any explosive precursor listed in Annex I or Annex II of EU Regulation 2019/1148.
regulationTypeCode = EXPLOSIVES_PRECURSORS_REGISTRATION isTradeItemRegulationCompliant = TRUE	Product contains restricted explosive precursor listed in Annex I of EU Regulation 2019/1148.
regulationTypeCode = EXPLOSIVES_PRECURSORS_REPORTING isTradeItemRegulationCompliant = NOT_APPLICABLE	

¹ Homogenous mixtures of more than 5 ingredients that contain either a restricted or reportable explosive precursor listed in Annex I and II of EU Regulation 2019/1148 in concentration below 1% w/w are not considered regulated explosives precursors by the EU Regulation 2019/1148.

Attribute values	Business meaning
regulationTypeCode = EXPLOSIVES_PRECURSORS_REGISTRATION isTradeItemRegulationCompliant = NOT_APPLICABLE	Product contains reportable explosive precursor listed in Annex II of EU Regulation 2019/1148.
regulationTypeCode = EXPLOSIVES_PRECURSORS_REPORTING isTradeItemRegulationCompliant = TRUE	
regulationTypeCode = EXPLOSIVES_PRECURSORS_REGISTRATION regulationTypeCode = EXPLOSIVES_PRECURSORS_REPORTING isTradeItemRegulationCompliant = TRUE	Product contains both restricted and reportable explosive precursor listed in Annex I and II of EU Regulation 2019/1148.

4 Additional requirements

In the context of EU Regulation 2019/1148, following attributes are only required by some of the EU markets. However, their implementation is recommended for all international suppliers in order to be compliant with requirements of all markets they serve.

4.1 Identifying the Regulation 2019/1148

In some European markets, suppliers need to provide Regulation number when indicating reportable or restricted substances. For international suppliers, it is recommended to always use also attributes regulatoryAct and regulatoryAgency when indicating whether or not the product contains reportable/restricted explosive precursors. Such product data will be accepted by all markets using GDSN to exchange information about explosive precursors.

4.1.1 Regulatory Act (BMS ID 3071)

- **GDSN name:** regulatoryAct
- **GDSN Module:** RegulatedTradeItemModule
- **GDSN definition:** The name given to the requirement assigned by the regulatory agency.
- **Instruction:** In some markets, data recipients expect this attribute to be provided together with regulationTypeCode and isTradeItemRegulationCompliant (chapter 3.1). See examples in chapter 4.1.3.
- **Remark:** In the context of EU Regulation 2019/1148, following value should be provided in this attribute: EC_2019_1148
- **Example:** EC_2019_1148

4.1.2 Regulatory Agency (BMS ID 3072)

- **GDSN name:** regulatoryAgency
- **GDSN Module:** RegulatedTradeItemModule
- **GDSN definition:** The required information is the name of the specific entity in charge of issuing the permit to a company.
- **Instruction:** In some markets, data recipients expect this attribute to be provided together with regulationTypeCode and isTradeItemRegulationCompliant (chapter 3.1). See examples in chapter 4.1.3.
- **Remark:** In the context of EU Regulation 2019/1148, following value should be provided in this attribute: EU
- **Example:** EU

4.1.3 Examples of identifying the Regulation 2019/1148

Attribute values	Business meaning
regulationTypeCode = EXPLOSIVES_PRECURSORS_REGISTRATION regulationTypeCode = EXPLOSIVES_PRECURSORS_REPORTING regulatoryAct = EC_2019_1148 regulatoryAgency = EU isTradeItemRegulationCompliant = NOT_APPLICABLE	Product does not contain any explosive precursor listed in Annex I or Annex II of EU Regulation 2019/1148. ²
regulationTypeCode = EXPLOSIVES_PRECURSORS_REGISTRATION regulatoryAct = EC_2019_1148 regulatoryAgency = EU isTradeItemRegulationCompliant = TRUE	Product contains restricted explosive precursor listed in Annex I of EU Regulation 2019/1148.
regulationTypeCode = EXPLOSIVES_PRECURSORS_REPORTING isTradeItemRegulationCompliant = NOT_APPLICABLE	
regulationTypeCode = EXPLOSIVES_PRECURSORS_REGISTRATION isTradeItemRegulationCompliant = NOT_APPLICABLE	Product contains reportable explosive precursor listed in Annex II of EU Regulation 2019/1148.
regulationTypeCode = EXPLOSIVES_PRECURSORS_REPORTING regulatoryAct = EC_2019_1148 regulatoryAgency = EU isTradeItemRegulationCompliant = TRUE	
regulationTypeCode = EXPLOSIVES_PRECURSORS_REGISTRATION regulationTypeCode = EXPLOSIVES_PRECURSORS_REPORTING regulatoryAct = EC_2019_1148 regulatoryAgency = EU isTradeItemRegulationCompliant = TRUE	Product contains both restricted and reportable explosive precursor listed in Annex I and II of EU Regulation 2019/1148.

4.2 Indicating explosive precursor

4.2.1 Regulation Level Code Reference (BMS ID 6211)

- **GDSN name:** regulationLevelCodeReference
- **GDSN Module:** RegulatedTradeItemModule
- **GDSN definition:** An external code associated with a specific warning type and possibly a description that helps recipients identify items of similar levels of warnings, that cannot be obtained from a description. The information provided in this attribute may come from a specific article in the full Regulation. For examples : - if the regulationTypeCode is "SMALL_PARTS" the regulationLevelCodeReference would be "Level 5" with codeDescription "Not for ages under 3" - if the regulationTypeCode is "BIOCIDE_REGULATION" the regulationLevelCodeReference would be "PT1" with codeDescription "Human hygiene"
- **Instruction:** In some markets, data recipients need to know what explosives precursors are contained in the product. This attribute can be used to provide such information. If the actual concentration of the substance needs to be communicated, use following three attributes as

² This can also indicate a homogenous mixture of more than 5 ingredients that contains either a restricted or reportable explosive precursor listed in Annex I and II of EU Regulation 2019/1148 in concentration below 1% w/w. Such mixtures are not considered regulated explosives precursors by the EU Regulation 2019/1148.

well: ChemicalIngredientScheme, ChemicalIngredientIdentification and ChemicalIngredientConcentration.

- **Remark:** There is a European local code list available for this attribute when used in relation to EU Regulation 2019/1148. Use the code values listed in Annex A of this guideline.
- **Example:** 3811-04-9

4.2.2 Indication of concentration thresholds (BMS ID 3075)

- **GDSN name:** regulatoryActComplianceLevelCode
- **GDSN Module:** RegulatedTradeItemModule
- **GDSN definition:** Code signifying the level of containment of specific toxicants for a product which contains carcinogens and/or reproductive toxicants established in California's Proposition 65 (Prop 65), The Safe Drinking Water and Toxic Enforcement Act, enacted in 1986. This Act requires the state to publish a list of chemicals known to cause cancer or reproductive harm. Prop 65 applies to suppliers who sell products in the state if their products exceed safe 286ilenam levels established in Prop 65. Safe 286ilenam levels establish thresholds for no significant risk levels (NSRLs) for carcinogens and maximum allowable dose levels (MADLs) for chemicals that cause reproductive toxicity.
- **Instruction:** This attribute is required in some markets when product contains restricted explosive precursor listed in Annex I of EU Regulation 2019/1148.
 - Code ABOVE_REGULATED_LEVELS indicates the product contains explosive precursor listed in Annex I of EU Regulation 2019/1148. Concentration of such substance is **higher than Limit value** defined for such substance in second column of Annex I of EU Regulation 2019/1148.
 - Code BELOW_REGULATED_LEVELS indicates the product contains explosive precursor listed in Annex I of EU Regulation 2019/1148. Concentration of such substance is **equal to or lower than Limit value** defined for such substance in second column of Annex I of EU Regulation 2019/1148. Such substance can be treated as "reportable only". It can only be used when all substances in the product meet this condition.
- **Remark:** Do not use code EXEMPT in context of EU Regulation 2019/1148. Use only when attribute regulationLevelCodeReference equals to a code representing restricted explosive precursor listed in Annex I of EU Regulation 2019/1148 (e.g. 7697-37-2, see Annex A of this guideline for full overview of these codes).
- **Example:** ABOVE_REGULATED_LEVELS, BELOW_REGULATED_LEVELS.

4.3 Indicating precise concentration of the explosive precursor

4.3.1 Chemical Ingredient Scheme (BMS ID 3182)

- **GDSN name:** chemicalIngredientScheme
- **GDSN Module:** safetyDataSheetModule
- **GDSN definition:** A managed list of chemical ingredient identifications for example CAS.
- **Instruction:** Use this attribute only when you need to communicate the precise concentration of the explosive precursor. In such case, this attribute shall equal CAS.
- **Remark:** When you use this attribute, you also need to use following two: ChemicalIngredientIdentification and ChemicalIngredientConcentration.
- **Example:** CAS

4.3.2 Chemical Ingredient Identification (BMS ID 3188)

- **GDSN name:** chemicalIngredientIdentification
- **GDSN Module:** safetyDataSheetModule

- **GDSN definition:** A unique number to identify a chemical used to cross reference regulated lists of chemicals for example CAS number.
- **Instruction:** Use this attribute only when you need to communicate the precise concentration of the explosive precursor. In such case, provide the CAS identification number of the explosive precursor.
- **Remark:** When you use this attribute, you also need to use following two: `chemicalIngredientScheme` and `ChemicalIngredientConcentration`.
- **Example:** 3811-04-9

4.3.3 Chemical Ingredient Concentration (BMS ID 3184)

- **GDSN name:** `chemicalIngredientConcentration`
- **GDSN Module:** `safetyDataSheetModule`
- **GDSN definition:** The percentage or amount of a chemical ingredient in relation to the total composition of the product.
- **Instruction:** Use this attribute only when you need to communicate the precise concentration of the explosive precursor. In such case, provide concentration (in percentages) of the explosive precursor contained in the product.
- **Remark:** When you use this attribute, you also need to use following two: `ChemicalIngredientIdentification` and `chemicalIngredientScheme`.
- **Example:** 5 %

4.4 Indicating maximum amount allowed for sale

Legislation in some markets regulate the amount of products containing explosive precursors that can be purchased by a consumer. Attribute **`consumerSalesConditionMaximumAmount`** shall be used for this purpose.

5 Annex A: European code list for regulationLevelCodeReference

Code	Code name in English	Type of explosive precursor
7697-37-2	Nitric acid	Restricted (Annex I)
7722-84-1	Hydrogen peroxide	Restricted (Annex I)
7664-93-9	Sulphuric acid	Restricted (Annex I)
75-52-5	Nitromethane	Restricted (Annex I)
6484-52-2	Ammonium nitrate	Restricted (Annex I)
3811-04-9	Potassium chlorate	Restricted (Annex I)
7778-74-7	Potassium perchlorate	Restricted (Annex I)
7775-09-9	Sodium chlorate	Restricted (Annex I)
7601-89-0	Sodium perchlorate	Restricted (Annex I)
100-97-0	Hexamine	Reportable (Annex II)
67-64-1	Acetone	Reportable (Annex II)

Code	Code name in English	Type of explosive precursor
7757-79-1	Potassium nitrate	Reportable (Annex II)
7631-99-4	Sodium nitrate	Reportable (Annex II)
10124-37-5	Calcium nitrate	Reportable (Annex II)
15245-12-2	Calcium ammonium nitrate	Reportable (Annex II)
7439-95-4	Magnesium, powders	Reportable (Annex II)
13446-18-9	Magnesium nitrate hexahydrate	Reportable (Annex II)
7429-90-5	Aluminium, powders	Reportable (Annex II)

6 Annex B: List of affected product categories (GPC)

Following table lists Global Product Classification (GPC) brick of product categories that are typically impacted by the Regulation 2019/1148. Please note there might exist products from different categories that are impacted by this regulation.

GPC Brick Code	GPC Brick Name
10001678	Artists Painting Surface Agents
10001676	Artists Paints/Dyes
10001680	Artists Palettes
10001746	Wood Burning/Engraving Craft Supplies Other
10000775	Cosmetic Products Other
10000669	Cosmetic Products Variety Packs
10000533	Cosmetics – Eyes
10000534	Cosmetics – Lips
10000360	Cosmetics – Nails
10000778	Nail Cosmetic/Care Products Other
10000333	Nails – Cleansers/Cosmetic Removers
10000361	Nails – Treatments
10000345	Hair – Colour
10000346	Hair – Conditioner/Treatment
10000348	Hair – Perming
10000834	Hair Care Products Other
10000536	Breath Fresheners/Mouth Rinses
10000383	Dental Cleansing
10003874	Household Paints
10002501	Paint/Varnish Removers/Cleaners
10005657	Preservers/Preservatives
10002462	Special Purpose Paints
10005687	Trim Paints
10005198	Camping Water Purification Treatments
10000531	Bleach

GPC Brick Code	GPC Brick Name
10000746	Cleaners Other
10000441	Disinfectants
10000423	Drain Treatments/Pipe Unblockers
10000440	Mould/Mildew Removers
10006234	Sanitizers
10000443	Stain Removers
10000426	Toilet Cleaning Products
10000696	Air Fresheners/Deodorisers (Powered)
10000697	Fresheners/Deodorisers Variety Packs
10000427	Laundry Colour Care
10000703	Fuels/Ignition Aids Variety Packs
10005266	Solid Fuels
10002423	Oral/Mouth Treatments
10003234	Plant/Soil Fertilizer/Food
10003221	Pool/Water Feature Chemicals/Treatments
10004110	Lawn/Garden Soil/Soil Amendments Other
10006378	Automotive Paint
10005232	Batteries (Automotive)
10005233	Battery Accessories (Automotive)