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WORKING PAPER

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From:	LT delegation
To:	Working Party on Technical Harmonisation (Explosives Precursors)
Subject:	Comments from the Lithuanian delegation on the proposal for a Regulation of the European Parliament and of the Council on the marketing and use of explosives precursors, amending Annex XVII to Regulation (EC) No 1907/2006 and repealing Regulation (EU) no 98/2013 on the marketing and use of explosives precursors

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Lithuanian suggests the following modifications of the proposal (inserted words **printed in bold** and deleted words in ~~striketrough~~).

Article 3. Definitions

'professional user' means any natural or legal person who has a demonstrable need for a restricted explosives precursor for purposes connected with their trade, business, craft, **authorised hobby** or profession which exclude making that restricted explosives precursor available to another person.

Comments

States authorises some hobbies in similar way as crafts (person must registered or get some kind permission to do activity). So natural or legal person who is authorised by state for some kind of hobby activity have legitimate basis to do such activity. And issuing licenses to acquire or possess restricted explosive precursors to above mentioned persons unreasonably increase administrative burdens.

Article 10. Training and awareness-raising

10.2. Member States **according to the need** shall organise, ~~at least once a year~~, awareness-raising actions, targeted to the specificities of each different sector using regulated explosives precursors.

Comments

Each State has intention and makes an efforts to ensure public security. In this area States have different challenges and different numbers of economic operators, so imperative rule to organise, at least once a year, awareness-raising actions only increase administrative burdens in States where terrorism risk is low.