

# Application for a Reassessment

**Under section 63 and 63A of the Hazardous Substances and New Organisms Act 1996**

January 2020

**To apply for an EPA Reassessment of a hazardous substance: to reassess its approval for use in New Zealand, to modify its controls and/or to change the official description of the substance**

Send to Environmental Protection Authority, preferably by email ([reassessments@epa.govt.nz](mailto:reassessments@epa.govt.nz)) or alternatively by post (Private Bag 63002, Wellington 6140)

We will send an invoice once we have assessed whether a full or modified reassessment is required - see our [Fees and Charges schedule](#) for details of the fees for full and modified reassessments.

## Completing this application form

### Getting advice

1. Contact an Advisor at the Environmental Protection Authority (EPA) as early as possible. We can help you with any questions during the preparation of your application, including assisting with on any consultation requirements. Please contact [reassessments@epa.govt.nz](mailto:reassessments@epa.govt.nz) for assistance.

### Do you have the right form?

2. Before you can apply for a reassessment, there must be a formal decision from the EPA that grounds for reassessment ('grounds') exist. If grounds have not been established, please complete and submit the [Grounds for Reassessment application form](#) on our [website](#) - we will contact you if we need more information.
3. If the proposed change to the approval is minor in effect or corrects a technical error, please complete the [Minor Amendment request form](#) on our [website](#).

### Types of reassessment and notifying the public and other parties

4. A reassessment can be a 'full' reassessment (under section 63 of the HSNO Act) or a 'modified' reassessment (under section 63A of the HSNO Act). This form covers both types. We will determine which type of reassessment is most appropriate for the change that you wish to make after we receive your application and before we contact you to let you know that your application is formally received.
5. We may decide to process your application as a modified reassessment if we consider that a full reassessment of the hazardous substance is not appropriate. We generally make this decision if the reassessment will only involve a specific aspect of the substance's existing approval.
6. Applications for reassessments of hazardous substances are usually publicly notified – this means we let the public know that we have received an application for the reassessment of a hazardous substance and they will be given a chance to submit relevant information for consideration during the decision-making process<sup>1</sup>.
7. We may opt for targeted notification if we are satisfied that your application meets the criteria under section 63A(5) of the HSNO Act, and if this is more practical and/or cost-effective than publicly notifying the application. During targeted notifications, we identify and consult with all affected parties and give them a reasonable opportunity to supply relevant information for consideration during the decision-making process.

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<sup>1</sup> An application for a full reassessment (i.e. submitted under section 63 of the HSNO Act 1996) will be publicly notified, as is required under section 53 of the HSNO Act. An application for a modified reassessment (i.e. submitted under section 63A of the HSNO Act) will be publicly notified unless we are satisfied that it meets the criteria for targeted notification under section 63A(5).

## Completing this form

8. The EPA will use the information you provide in this form to consider your application for a reassessment, as covered by section 63 and 63A of the Hazardous Substances and New Organisms Act 1996.
9. If you are supplying information or data with this application that does not belong to you, please ensure that you have permission from the owner of the information or data.
10. Please complete all sections of this form, unless we indicate that they are optional. We cannot formally receive or process your application unless you provide all of the information requested in the mandatory sections of this form. If a section is not relevant to your application, please provide a comprehensive explanation why this does not apply. If you choose not to provide the requested information, you must apply for a waiver<sup>2</sup> by completing the section on the last page of this form.
11. This form is designed to gather the information needed to understand and assess your application, and for interested parties to understand the purpose of the application and how their interests may be affected. We may ask for additional information to help us understand the proposed change and the potential effects of the change. We will endeavour to identify these further information requirements before the application is formally received and publicly notified. Please note that we may request additional information from you or any other source at any time during the application process.
12. You must sign this application form (the EPA will accept electronically signed forms) and send it to us preferably by email ([reassessments@epa.govt.nz](mailto:reassessments@epa.govt.nz)) or alternatively by post (Private Bag 63002, Wellington 6140).
13. Once we have received your application, we will send you an acknowledgement by email with your assigned application number. We will then decide whether your application will proceed as a modified or full reassessment, and issue an invoice for the appropriate fee. Information about application fees is available on the EPA [website](#).
14. We will email when we need to contact you about your application, unless you ask otherwise.

## Privacy

15. You have the right to access and correct any personal information in connection with your application under the Privacy Act 1993.
16. Information provided as part of this application is collected by the EPA for the purpose of administering the application for a reassessment. This includes informing the public of applications. We may also contact you for feedback on the application process using a third party provider.

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<sup>2</sup> Section 59(3)(a)(ii) of the HSNO Act allows applicants to apply for the EPA to waive the need to supply information.

## Commercially sensitive information

17. We strongly advise applicants to provide as much information as possible about the substance and its use. This information helps our assessment and informs the decision-makers.
18. To prevent delays in processing the application, all available information on the substance and active ingredient/s must be provided with your application form. We expect this information will be made publicly available with the application unless there is a genuine reason for it to be considered commercially sensitive.
19. Where scientific studies or other reports are provided and deemed commercially sensitive, a summary of each study or report, its methods and results should be provided as publicly-available information.
20. Commercially-sensitive information may be identified as confidential by placing it in an approved EPA [Confidential Appendix form](#) that is separate to this form (also available on our [website](#)). Show this in the relevant section of this form by giving your detailed reasons for considering it to be commercially sensitive and cross referencing to where that information is located in an appended Confidential Appendix form. We will review the information you provide as confidential or commercially sensitive and assess whether it meets the criteria in section 57 of the HSNO Act. If we decide it does not, the information provided will be made publicly available with the rest of your application.
21. We will not release any information that you supply to us before the formal lodgement of your application (the date a completed application form is submitted), unless it has already been made publicly available as part of a consultation process. Following formal lodgement of your application, any information in the body of this application form and any non-confidential appendices will become publicly available.
22. After you have formally lodged your application with the EPA, any information that you have supplied to the EPA regarding your application is subject to the Official Information Act 1982 (OIA). If a request is made for the release of information that you consider to be confidential, your view will be considered in a manner consistent with the OIA and with section 57 of the HSNO Act. You may be required to provide further justification for your claim of confidentiality. Please see the guide on our [website: Supplying confidential information to the EPA - your rights and our obligations](#). Further information on the OIA is available at [www.ombudsman.parliament.nz/](http://www.ombudsman.parliament.nz/).

## Section 1: Applicant details

### 1.1 Name and postal address of the organisation or person making the application:

**Legal name of organisation or person:**

Environmental Protection Authority

**NZBN:**

9429041901977

**Postal Address:**

Private Bag 63002  
Wellington 6140  
New Zealand

**Contact person and role:**

Dr Allan Freeth  
Chief Executive

**Phone:**

+64 4 916 2426

**Email:**

reassessments@epa.govt.nz

**Email for our invoice, if different:**

Email for invoice (if different)

### 1.2 Applicant's contact details in New Zealand, if different from 1.1:

**Legal name of organisation or person:**

Environmental Protection Authority

**NZBN:**

9429041901977

**Postal Address:**

Private Bag 63002  
Wellington 6140  
New Zealand

**Contact person and role:**

Dr Clark Ehlers  
Manager, Hazardous Substances Reassessments

**Phone**

+64 4 916 2426

**Email:**

reassessments@epa.govt.nz

## Section 2: Summary of the application

### 2.1 Name for the reassessment:

Name of the substance(s) or generic name of the class of chemicals or products to be reassessed.

Hydrogen cyanamide

### 2.2 Purpose statement of the application for the public register:

Please summarise the reason for this application in one concise sentence. You should include the description of the hazardous substance and/or HSNO approval(s) to be reassessed and the proposed change(s)

For example: 'To reassess the active ingredient [name of active ingredient] and its formulations to increase the application rate from X to Y.'

To reassess hydrogen cyanamide

### 2.3 Executive summary of the application for the public register:

Please provide a clear and comprehensive summary of your application, including the specific amendments that you propose for this substance

See attached Application Report

### 2.4 Grounds to conduct a reassessment

Tell us the application number (APPXXXXXX) of the Grounds for Reassessment application for this substance.

Note: grounds for reassessment must be obtained before you can use this form to apply for a reassessment. If you have not obtained grounds please complete and submit the Grounds for Reassessment application form first. This form is available on our website.

APP203865

### 2.5 Under which criteria were grounds for reassessment granted?

#### To reassess the hazardous substance(s) because of (tick all that apply):

significant new information becoming available

another substance with similar or improved beneficial effects and reduced adverse effects has become available

information showing a significant change of use, or a significant change in the quantity manufactured, imported or developed has become available

## Section 3: Substance(s) to be reassessed

### 3.1 Which hazardous substance(s) approval(s) do you want to be reassessed?

Approval name	Approval Number (e.g. HSRXXXXXX)	Active Ingredient		
		Active Ingredient	CAS number <sup>3</sup>	Concentration
Hydrogen cyanamide	HSR002949	Hydrogen cyanamide	420-04-2	100%
Soluble concentrate containing 520 to 540 g/L hydrogen cyanamide	HRC000001	Hydrogen cyanamide	420-04-2	520 – 540 g/L

(add a new row for each approval)

### 3.2 Have any of the substance(s) or any of their components: been restricted, had their registrations not renewed, or their approvals revoked overseas?

#### Overseas restrictions

- Yes
- No

See attached Application report – International status section 5

### 3.3 Use profile of the substance(s)

#### Where is the substance intended to be used?

- Is this substance used in workplaces e.g. on commercial farms or by contractors?
- Is this substance sold to or available to the general public e.g. for domestic or household use?

#### What is the intended use of the substance?

- |  |   |
|--|---|
| <input type="checkbox"/> Herbicide                         | <input type="checkbox"/> Timber treatment       |
| <input type="checkbox"/> Fungicide                         | <input type="checkbox"/> Vertebrate poison      |
| <input type="checkbox"/> Insecticide                       | <input type="checkbox"/> Antifouling paint      |
| <input checked="" type="checkbox"/> Plant growth regulator | <input type="checkbox"/> Fumigant               |
| <input type="checkbox"/> Seed treatment                    | <input type="checkbox"/> Industrial chemical    |
| <input type="checkbox"/> Urban pest control                | <input type="checkbox"/> Other: Please describe |

<sup>3</sup> See definitions on last page of this form

### 3.4 What is the current use pattern of the substance?

Please use Table 1 and/or 2 below, as appropriate, for identifying the current use(s) of the substance(s) to be reassessed. You may use the same line for multiple substances or crops if the use pattern is the same. If this application is for multiple substances, you may substitute this section for a publicly-available appendix containing the relevant GAP table information and reference that appendix here.

**Table 1. Current use pattern for plant protection products – See attached Application report – Current use section 4**

You must outline either all the proposed uses of the product or the worst case scenario for each application method (considering both the application rate and frequency).

Crop and/or situation (a)	Product Code	F G or I (b)	Pest or group of pests controlled (c)	Formulation			Application			Application rate per treatment			PHI (days) (l)	Remarks (m)
				Type (d-f)	Conc of as (i)	Method kind (f-h)	Growth stage and season (j)	Number min (k)	Interval between applications (min)	Kg as/hL min max	Water L/ha min max	Kg as/ha min max		

- (a) For crops, the EU and Codex classifications (both) should be used; where relevant, the use situation should be described (e.g. fumigation of a structure)
- (b) Outdoor or field use (F), glasshouse application (G) or indoor application (I)
- (c) e.g. biting and sucking insects, soil borne insects, foliar fungi, weeds
- (d) e.g. wettable powder (WP), emulsifiable concentrate (EC), granule (GR)
- (e) GCPF Codes - GIFAP Technical Monograph No 2, 1989
- (f) All abbreviations used must be explained
- (g) Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench
- (h) Kind, e.g. overall, broadcast, aerial spraying, row, individual plant, between the plants - type of equipment used must be described

- (i) g/kg or g/l
- (j) Growth stage at last treatment (BBCH Monograph, Growth Stages of Plants, 1997, Blackwell, ISBN 3-8263-3152-4), including where relevant, season at time of application
- (k) The minimum and maximum number of applications possible under practical conditions of use must be provided
- (l) PHI - minimum pre-harvest interval
- (m) Remarks may include: extent of use, economic importance and restrictions

**Table 2: Current use pattern for pesticides not used as plant protection products – N/A**

Use this table for substances such as timber treatments, Vertebrate Toxic Agents (VTA), antifouling paints or fumigants.

You must outline either all the proposed uses of the product or the worst case scenario for each application method (considering both the application rate and frequency).

User (a)	Area of Use (b)	Pest or group of pests controlled (c)	Application			Application rate per treatment (f)	Remarks (g)
			Method (d)	Number min max (e)	Interval between applications - days (minimum)		

- (a) Professional/non-professional (see Definitions section at the end of this form)
- (b) Domestic/commercial/industrial
- (c) e.g. biting and sucking insects, soil borne insects, foliar fungi, weeds
- (d) Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench

- (e) The minimum and maximum number of applications possible under practical conditions of use must be provided
- (f) g/kg and g/l or others
- (g) Remarks may include; extent of use, economic importance and restrictions

**3.5 What is the proposed new use pattern of the substance?**

Please use Table 3 and/or 4 below, as appropriate, for identifying the proposed new use(s) of the substance(s) to be reassessed. You may use the same line for multiple substances or crops if the use pattern is the same. If this application is for multiple substances you may substitute this section for a publicly available appendix containing the relevant GAP table information and reference that appendix here.

**Table 3. Proposed new use pattern for plant protection products – N/A**

You must outline either all the proposed uses of the product or the worst case scenario for each application method (considering both the application rate and frequency).

Crop and/or situation (a)	Product Code	F G or I (b)	Pest or group of pests controlled (c)	Formulation			Application			Application rate per treatment			PHI (days) (l)	Remarks (m)
				Type (d-f)	Conc of as (i)	Method kind (f-h)	Growth stage and season (j)	Number min max (k)	Interval between applications (min)	Kg as/hL min max	Water L/ha min max	Kg as/ha min max		

- (a) For crops, the EU and Codex classifications (both) should be used; where relevant, the use situation should be described (e.g. fumigation of a structure)
- (b) Outdoor or field use (F), glasshouse application (G) or indoor application (I)
- (c) e.g. biting and sucking insects, soil borne insects, foliar fungi, weeds
- (d) e.g. wettable powder (WP), emulsifiable concentrate (EC), granule (GR)
- (e) GCPF Codes - GIFAP Technical Monograph No 2, 1989
- (f) All abbreviations used must be explained
- (g) Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench
- (h) Kind, e.g. overall, broadcast, aerial spraying, row, individual plant, between the plants - type of equipment used must be described

- (i) g/kg or g/l
- (j) Growth stage at last treatment (BBCH Monograph, Growth Stages of Plants, 1997, Blackwell, ISBN 3-8263-3152-4), including where relevant, season at time of application
- (k) The minimum and maximum number of applications possible under practical conditions of use must be provided
- (l) PHI - minimum pre-harvest interval
- (m) Remarks may include: extent of use, economic importance and restrictions

**Table 4. Proposed new use pattern for pesticides not used as plant protection products – N/A**

Use this table for substances such as timber treatments, Vertebrate Toxic Agents (VTA), antifouling paints or fumigants.

You must outline either all the proposed uses of the product or the worst case scenario for each application method (considering both the application rate and frequency).

User (a)	Area of Use (b)	Pest or group of pests controlled (c)	Application			Application rate per treatment (f)	Remarks (g)
			Method (d)	Number min max (e)	Interval between applications - days (minimum)		

(a) Professional/non professional

(b) Domestic/commercial/industrial

(c) e.g. biting and sucking insects, soil borne insects, foliar fungi, weeds

(d) Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench

(e) The minimum and maximum number of applications possible under practical conditions of use must be provided

(f) g/kg and g/l or others

(g) Remarks may include; extent of use, economic importance and restrictions

## Section 4: Your reassessment proposal

**4.1 Would you like the Environmental Protection Authority to change the description(s) of the substance(s)? If yes, describe the change, evidence and reason to support the change.**

*Identify the aspect of the substance description to be changed (substance name, formulation details, hazard classification, or any other aspect). Provide the reasons and evidence to support this proposed change.*

No

**4.2 Would you like the Environmental Protection Authority to consider revoking the approval(s) of this substances(s)? If yes, provide evidence to support this proposal.**

*Identify this evidence and the reason for this proposed revoking of the approval(s).*

*(Note: If the Authority decides to undertake a full reassessment it can consider revoking any approval included in the reassessment, whether it is part of the applicant's proposal or not)*

See attached Application report – Proposals section 11

**4.3 Would you like the Environmental Protection Authority to review or change one or more of the control(s) attached to this substance(s)? If yes, identify the control(s) to be changed, describe what needs to be changed or reviewed and the reasons and evidence to support the proposed change or review. Where practical, include the text of the control showing the proposed change. Supporting information, risk assessments, study reports or other supporting information or evidence can be included in an appendix and referenced in this section.**

See attached Application report – Proposals section 11

**4.4 List and describe any other controls or aspects that may be affected by the proposed change(s). For example, increasing the application rate of a pesticide may affect the size or need for a buffer zone, or personal protective equipment.**

See attached Application report – Proposals section 11

**4.5 Is there reasonable cause to believe that there is actual or imminent danger to human health or safety or the environment from the continued use of the substance(s)? If yes, please provide a description and evidence to support this claim.**

See attached Application report – Proposals section 11

## Section 5: Effects of the reassessment

Please provide a comprehensive assessment of the potential effects of the proposed change to the controls or the approval (an “effects assessment”). The size, scope and level of detail provided should be appropriate to the significance of the change proposed, and the effects or issues related to that change.

You may provide an effects assessment as a separate report: if you do, please provide an executive summary below. Your assessment should consider both positive effects (including a reduction in negative effects) and negative effects.

An effect is defined as:

- any potential or probable effect; and
- any temporary or permanent effect; and
- any past, present, or future effects; and
- any acute or chronic effect; and
- any cumulative effect which arises over time or in combination with other effects

The effects assessment should consider covering the following aspects (if there is no effect or the aspect is not relevant then your assessment should describe why this is the case):

- Effects on human health including worker and public health
- Environmental effects including impacts on native or valued species and/or ecosystems
- Economic benefits or costs of the proposed change
- Effects on the relationship of Māori and their culture and traditions with their ancestral lands, waters, historical sites, wāhi tapu, valued flora and fauna, and other taonga
- Effects on, or implications for, New Zealand’s International Obligations

You must complete this section, referencing all supporting material used. You must describe the source of the information in this application, e.g. from in-house research, independent research, technical literature, community or other consultation, and provide that information with this application. Details of information sources can be listed in section 8 of this form.

See attached Application report – Risk assessment section section 7, Māori impact assessment section 8, and Benefits assessment section 9

## Section 6: Best practice considerations

### 6.1 What are the industry or best New Zealand practices for the safe management of the substance(s)?

See attached Application report – Current use section 4

### 6.2 Are there New Zealand standards or Codes of Practice that apply to the management of the substance(s)?

See attached Application report – Current use section 4

### 6.3 What are the international standards for the safe management of the substance(s)?

See attached Application report – International status section 5

## Section 7: Additional Information (optional)

**7.1 Provide any additional information to support the proposal to change the approval here and indicate how or why it is relevant.**

*For example, a letter of support from industry to indicate the need for the substance or proposed change.*

See attached Application report and Appendices

## Section 8: Source of supporting information

### 8.1 Please provide an index of your supporting information.

*Please list the documents, scientific articles and other information referenced in your application. These are considered as evidence to support your proposal. Please ensure that the supporting information listed here is discussed in one of the completed sections in this application form.*

*If you are seeking that a document be treated as confidential or commercially sensitive, please ensure that you indicate that in your reference list. If the reference is publicly available, e.g. an article in a scientific journal, then please provide a link or reference that allows external stakeholders to access the document. A copy of all supporting information must be supplied to the EPA with the application. You may provide this information in a separate appendix or a different format provided that you include the information specified in Table 5.*

**Table 5. Index of supporting information or references**

	<b>Name or reference number of report, study or supporting information</b>	<b>Description (e.g. acute oral toxicity study for bees)</b>	<b>Source</b>	<b>Confidential information (Y/N)</b>
1				
2				
3				
4				

*(add more rows as required)*

## Section 9: Before you submit: checklist

Please ensure that your application is complete

Application		Comments/justifications
All mandatory sections of the application form completed, or you have requested an information waiver under section 59 of the HSNO Act	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If No, please contact us before you submit your application)	Enter here
Any confidential or commercially sensitive data formatted into the Confidential Appendix template and appended.  Please note the EPA strongly encourages applicants to provide as much information as possible in the main body of the application form unless there is a genuine reason for it to be considered confidential or commercially sensitive.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Enter here
Supplementary optional information attached:		
• Copies of additional references	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Enter here
• Letter(s) of access	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Enter here
• Relevant correspondence	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Enter here
• Draft label	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Enter here
• Draft Safety Data Sheet (SDS)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Enter here

## Request for information waiver under section 59 of the HSNO Act

- I request for the Authority to waive any legislative information requirements (i.e. concerning the information that has been supplied in my application) that my application does not meet (tick if you are choosing to omit any mandatory information).

Please list below which section(s) of this form are relevant to the information waiver request:

Type information here

**Signature of applicant or person authorised to sign on behalf of applicant**

- I am making this application, or am authorised to sign on behalf of the applicant or applicant organisation.
- I have completed this reassessment application to the best of my ability and, as far as I am aware, the information I have provided in this application form is correct.



Environmental  
Protection Authority  
Te Mana Rauhi Tāhū

20/09/2021

Signature

Date

**To submit an application for a reassessment, send to the EPA Hazardous Substances Reassessments team:**

- preferably by email to: [reassessments@epa.govt.nz](mailto:reassessments@epa.govt.nz)
- or by post to: Environmental Protection Authority, Private Bag 63002, Wellington 6140

*You will be invoiced once the reassessment application pathway is determined.*

[See our website for information about fees and charges.](#)

**For assistance with preparing your application, contact one of our Hazardous Substances Advisors:**

- by email: [reassessments@epa.govt.nz](mailto:reassessments@epa.govt.nz)
- Freephone (within New Zealand): 0800 429 7827 (0800 HAZSUBS)

## Definitions

<b>Active ingredient</b>	Component of a formulated substance responsible for the pesticidal effect or veterinary medicinal therapeutic effect
<b>CAS Number</b>	Chemical Abstracts Service number. This is a unique identifier for a chemical substance
<b>Hazardous properties</b>	This relates to the hazard classification of a substance and the properties that trigger any threshold level for the substance to be hazardous
<b>Hazardous substance</b>	<p>Any substance with one or more of the following intrinsic properties:</p> <ul style="list-style-type: none"> <li>• Explosiveness</li> <li>• Flammability</li> <li>• A capacity to oxidise</li> <li>• Corrosiveness</li> <li>• Toxicity (including chronic toxicity)</li> <li>• Ecotoxicity, with or without bioaccumulation, or</li> </ul> <p>which on contact with air or water (other than air or water where the temperature or pressure has been artificially increased or decreased) generates a substance with any one or more of the properties specified in this definition</p>
<b>Pesticide</b>	Substance or mixture of substances intended to be used for preventing, controlling, repelling or mitigating any pest (including vertebrates) in areas such as, but not limited to, agriculture, home and garden, rights of way or industrial areas
<b>Professional and non-professional users</b>	<p>Professional users are using pesticides in the course of their job or business (such as farmers and growers or amenity users). Professional use may include the use of formulated substances in order to deliver services to business or private customers</p> <p>Non-professional users are not using pesticides in the course of their job or business (such as lifestyle block owners, general public using pesticides for domestic use, and so on)</p>
<b>Substance</b>	<p>Any of the following:</p> <ul style="list-style-type: none"> <li>• Any element, defined mixture of elements, compounds or defined mixture of compounds, either naturally occurring or produced synthetically, or any mixtures thereof;</li> <li>• Any isotope, allotrope, isomer, congener, radical or ion of an element or compound which has been declared by the Authority, by notice in the Gazette, to be a different substance from that element or compound;</li> <li>• Any mixtures or combinations of any of the above;</li> <li>• Any manufactured article containing, incorporating or including any hazardous substance with explosive properties.</li> </ul> <p>(section 2(1) HSNO Act)</p>