



EUROPEAN COMMISSION
ENTERPRISE AND INDUSTRY DIRECTORATE-GENERAL

Chemicals and construction
Chemicals

Proposal for a

DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

on the placing on the market of pyrotechnic articles

Impact Assessment

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1. Issue that the proposal tackles

Pyrotechnical articles (eg distress flares, fireworks) are designed to produce effects such as the generation of gas, light, noise or smoke by chemical means. Fireworks and automotive occupant restraint systems (eg car air bags and seat belt pre-tensioners), represent the major uses of such articles within the EU.

The EU market for fireworks

The EU firework industry essentially comprises SMEs and is estimated to employ around 3,000 people in the EU. Few fireworks are manufactured in the EU. The vast majority of fireworks on the EU market are imported into the EU from China. As a result, most of those employed within the EU are involved in the purchasing, storage, distribution and professional display of fireworks. Many of those fireworks which are manufactured in the EU are for professional use (category 4).

EU 25 Trade in fireworks				QUANTITY_IN_100K G
PERIOD	Total Imports	Imports from China	%	Total exports
2000	898,185	888,701	98.9%	18,193
2001	580,783	576,810	99.3%	16,016
2002	792,881	788,288	99.4%	10,790
2003	948,268	935,117	98.6%	15,263
2004	1,061,924	1,026,824	96.7%	9,403

Source: EUROSTAT

The EU market for fireworks for sale to consumers (categories 1, 2 and 3) is estimated to around €700 million per year. The EU market for fireworks for sale to professionals only (category 4) is also estimated to be around €700 million per year.

The EU market for automotive occupant restraint systems

It is estimated that automotive occupant restraint systems are placed in around 20 million vehicles in the EU each year. In the case of airbags, this amounts to around 80 million systems being placed on the market each year with a value of around €3.5 billion. And in the case of seat belt pre-tensioners, around 90 million units are placed on the market each year with a value of around €2 billion.

Whereas the EU is a net importer of fireworks, it is a net exporter of automotive components containing pyrotechnic articles, such as airbag systems. One also has to keep in mind that many more airbag systems are being exported as parts of assembled motor vehicles.

EU25	Trade Value in €			
Airbags	Jan.-Dec. 2001	Jan.-Dec. 2002	Jan.-Dec. 2003	Jan.-Dec. 2004
Export	199,485,099	216,686,996	239,132,092	223,438,297
Import	39,954,463	15,285,657	9,581,158	16,090,411

Source: EUROSTAT

Accidents

Replying to a Commission questionnaire, unfortunately, only a limited number of Member States and 1 EFTA Member provided numerical information on accidents involving fireworks. In some cases, this might be the result of national systems for the recording of accidents not containing specific information on fireworks as a cause of accident. 2 Member States also provided general information on accidents involving fireworks. For those countries which were able to provide numerical information on accidents, the table below lists some of the information recorded and compares the number of accidents to the population of the Country.

Comparison of recorded accidents and population

(Accident rate listed as number of accidents per million inhabitants)

-Only listing those replying to the questionnaire

Year	Pop (m)	2002	2001	2000	1999	1998	1997
Denmark	5.4						
Accidents		539	440	557	468	656	831
<i>Rate</i>		<i>100.4</i>	<i>82.0</i>	<i>103.8</i>	<i>87.2</i>	<i>122.2</i>	<i>154.8</i>
UK	60.1						
Accidents		1017	1362	972	1056	831	908
<i>Rate</i>		<i>16.9</i>	<i>22.7</i>	<i>16.2</i>	<i>17.6</i>	<i>13.8</i>	<i>15.1</i>
Greece	10.6						
Accidents		4	16	18	9	6	11
<i>Rate</i>		<i>0.4</i>	<i>1.5</i>	<i>1.7</i>	<i>0.8</i>	<i>0.6</i>	<i>1.0</i>
Ireland	3.9						
Accidents		8	22	11	3	10	6
<i>Rate</i>		<i>2.1</i>	<i>5.7</i>	<i>2.8</i>	<i>0.8</i>	<i>2.6</i>	<i>1.5</i>
Estonia	1.36						
Accidents		10	20	25	13	18	30
<i>Rate</i>		<i>7.3</i>	<i>14.7</i>	<i>18.4</i>	<i>9.6</i>	<i>13.2</i>	<i>22.2</i>

Norway	4.5						
Accidents		137	153	124	138	167	
Rate		30.3	33.8	27.4	30.5	36.9	

In addition to the above, a survey based on accidents recorded in a small number of Swedish hospitals in 1997 estimated that following an extrapolation, between 400 -500 persons were injured by fireworks in Sweden each year. This estimate results in an accident rate of between 45 and 56 accidents per million inhabitants.

It should be noted that the above only lists reported accidents and is based on cases requiring hospital treatment. It does not include information on accidents which may have been treated by a General Practitioner or that may have occurred in the home and have not been reported. It is therefore possible that the number of accidents recorded underreports the true number.

Beyond stating the above factual information, it is not possible to read much into the data provided and any attempts to do so must be treated with caution.

It appears that accident rates vary between countries. This may be in part due to local customs for the public usage of fireworks. These differences in public attitude to fireworks relate to the times of year when fireworks are most in demand, the type of firework used, and the way in which consumers approach these products.

Given that it is not possible to read much into the information beyond stating factual data, any attempt to estimate a figure for the total number of accidents across the EU must be treated very cautiously. However, a lower accident rate might be in the region of 15 per million and an upper rate might be in the region of 100 per million. Using these rates for an enlarged EU population of 455 million would give a total number of accidents involving fireworks of between 7,000 and 45,000 for this area.

For fireworks injuries by type of fireworks, the only detailed figures available from an EU Member State are from the UK:

**Firework Injuries in Great Britain 2002-2004
(4 week period in October-November)**

Type of Firework

	2004	2003	2002
1. Rocket	283	257	204
2. Air Bomb / Roman Candle	121	134	148
3. Sparkler	149	140	132
4. Other fireworks	86	119	128
5. Home made or extracted powder	14	6	13
6. Not known	507	480	392

Source: http://www.dti.gov.uk/homesafetynetwork/fw_stats.htm

There are no statistics available based on the categorisation of fireworks according to CEN.

Looking at the UK statistics again, one can see that about 50% of all accidents concerned under 17 year olds, with more than 30% of all injured being children under 13 years of age.

Age group of injured	2004		2003		2002	
1. Over 20 years	516	44.5%	482	42.4%	380	37.4%
2. 18-20	79	6.8%	66	5.8%	54	5.3%
3. 13-17	197	17.0%	220	19.4%	230	22.6%
4. Under 13	368	31.7%	368	32.4%	353	34.7%
	1160		1136		1017	

Source: http://www.dti.gov.uk/homesafetynetwork/fw_stats.htm

It is also interesting to know that over these three years about 50% of all injuries in the UK occurred at family and private parties.

Information on whether accidents are a result of a malfunction or a misuse of a firework is limited. The information presented suggests that the majority are a result of misuse although it is interesting to note that in Denmark in 2002, almost half of the recorded accidents were a result of a malfunction of the firework.

Since fireworks can be easily transported from one EU Member State to another due to open borders, it is necessary to ensure that elementary essential safety requirements are being complied with throughout the Union. For example, the Netherlands Environment Ministry recently declared that only 10 % of the illegal fireworks smuggled into the country were being intercepted and that at least 20% of the consumer fireworks available in the Netherlands were dangerous.

Major accidents involving fireworks have occurred world- and Europe-wide. The best known major accident is the explosion at a fireworks storage facility in the Dutch city of Enschede on 13 May 2000 that claimed 21 lives and injured 944 people. The investigations after the accident found that nearly 90 per cent of the fireworks had been classified wrongly (Oosting Report). With a reliable classification and labelling of different types of fireworks, disasters like this may be prevented in the future.

Moreover, the Commission was recently informed by Denmark that an explosion accident at a Danish fireworks factory in November 2004 was caused by the accidental dropping of a box of fireworks in a metal container by an employee. This incident led to a series of explosions which unfortunately cost the life of a fireman and led to the destruction of an entire neighbourhood. Whereas fireworks manufacturing and storage in general is subject to the Seveso II Directive, which lays down rules regarding storage and emergency planning, malfunctions such as the untimely initiation or ignition of individual pyrotechnic articles will need to be dealt with separately.

Other pyrotechnic articles such as automotive pyrotechnic articles, stage effects and distress flares are also subject to differing national legislations. However, the Commission does not have any statistics on malfunctions or accidents for these products, but it cannot be excluded that accidents due to malfunctions occur.

2. Main objectives that the proposal is expected to reach

The overall objective of the proposal is the creation of a single market in pyrotechnical articles whilst ensuring a high level of protection to consumers. Legislation on the marketing and use of pyrotechnical articles is currently determined nationally throughout the EU and such divergent national legislation is liable to cause barriers to trade. Therefore one of the objectives of the proposal is to create a single market in pyrotechnical articles in order to achieve cost savings for those companies which are active in several Member States, based on the principle “tested once, accepted everywhere”.

Another objective is to reduce accidents. The aim of this Commission proposal is therefore to reduce accidents from fireworks as far as possible by ensuring that only CE marked articles which comply with the essential safety requirements are being placed on the market.

3. Main policy options available to reach the objective

No policy change

Fireworks

Currently, national provisions for the approval of fireworks which may be placed on market differ throughout the EU. In some Member States, approval for the placing on the market of fireworks is based on an approval to type of firework (type approval). In others, it is based on manufactured batches of fireworks meeting certain rates of reliability (batch testing).

Automotive pyrotechnic articles

Many Member States have different approval processes for the placing of inflators, modules and safety devices for automotive and other uses on their markets. These approval processes currently use national regulations and laws for the approval of these products.

Co-ordinated Member State action

Regarding fireworks, the Commission could continue to make use of the working group created for the consultation on the draft Pyrotechnics Directive in order to assist Member States in coordinating their policies and actions on pyrotechnic articles and to exchange information regarding defective fireworks.

Regarding automotive pyrotechnic articles, the Member States could also make use of the UN ECE 1958 Agreement¹ in order to agree on common requirements.

Essential safety requirements, CE marking and subsidiarity

¹ Agreement concerning the Adoption of Uniform Conditions Of Approval and Reciprocal Recognition of Approval for Motor Vehicle Equipment and Parts

The Commission could propose a Directive which would create of a single market in pyrotechnic articles and ensure a high level of consumer protection. It would adopt the classic EU “new approach” to legislation by setting out essential safety requirements. Articles which are assessed as meeting the safety requirements will receive a CE mark guaranteeing their free circulation within the EU whilst at the same time ensuring a high level of protection to consumers.

In line with other new approach legislation, in order to facilitate the process of demonstrating compliance with the essential requirements, it is proposed that harmonised standards be developed and adopted by the Committee for European Standardisation (CEN), one of the recognised competent institutions for the adoption of harmonised standards. The proposed Directive also adopts the new legislative approach with the use of harmonised modules introduced by Council Decision 93/465/EEC for the various phases of the conformity assessment procedures. The application of these modules will make it possible to determine the responsibility of manufacturers and of bodies responsible for applying procedures for conformity assessment by taking account of the nature of the pyrotechnic articles.

Subsidiarity can be taken into account as the proposed Directive would not preclude Member States from taking measures on grounds of public security or safety to restrict the placing on the market of certain categories of fireworks. The proposed Directive also could allow Member States to increase the minimum age limits for the sale of fireworks to consumers again on grounds of public security or safety.

Total harmonisation

The total harmonisation approach would also introduce CE marking as described above, it would however not allow Member States to determine themselves when fireworks can be sold or to restrict the sale and use of certain kinds of fireworks.

4. Impacts expected from the different options identified

No policy change

Fireworks

Currently, the costs of testing to type vary considerably between Member States, and there is in general no mutual recognition of test results. In one Member State, there is no charge on the industry whilst in at least two Member States the costs are very low. In these cases, it is clear that public administrations are bearing the costs. In other Member States, costs vary between €500 - €2,500 and tend to increase from category 1 through to category 3 fireworks. These costs are more likely to reflect the true range for the type testing of fireworks.

In those Member States where approval to place fireworks on the market is based on batch testing, the tests are conducted close the manufacturing location (i.e. China). No information is currently available on these costs. In all cases, manufacturers must meet these costs in every Member State where they market products.

As far as accidents are concerned, and taking into account that it is very easy to transport fireworks illegally from one Member State to another over open borders, it is not easy for authorities to control the placing on the market of fireworks. Without the definition of essential safety requirements, it can be expected that the number of accidents due to the

effective fireworks would further increase because of quality problems due to rising cost pressures in the Chinese industry.

Automotive pyrotechnic articles

According to industry sources, approval procedures for automotive pyrotechnic articles differ widely throughout the EU. In Germany, one approval costs companies about €25,000, including €1500 to €2000 fees charged by the approval authority, €10,000 for samples and the rest for company internal expenditure. Whereas the German classification according to the United Nations rules on transport (ADR) is being and recognised by the UK, Sweden and Austria, companies for example have to undergo different tests in France. Spain again accepts the ADR classification of Germany and France, but not that of Austria.

Co-ordinated Member State action

Compared to the no policy change option, co-ordinated Member State action could save some costs for pyrotechnics manufacturers if a number of Member States would decide to align their approval procedures and/or to mutually accept the approvals and classifications of other Member States. However, it seems unlikely that the approval processes could be completely aligned or that Member States would accept each other's approvals or classifications without having a legal base for doing so. The improved exchange of information on defective fireworks in the framework of the Pyrotechnics Working Group, combined with increased market surveillance activities, could lead to a reduction of accidents. However, market surveillance would stay burdensome, as there would still be no EU-wide essential safety requirements and requirements to mark and label pyrotechnic articles.

Concerning automotive pyrotechnic articles, the Member States could also start working on a document regarding the type approval of airbags and seat belt tensioner systems at the automotive working party under the UN ECE 1958 Agreement. In the end, it seems very likely that such a document would eventually be taken over by EU legislation. Whereas “new approach” legislation only lays down the essential safety requirements and leaves the rest to the manufacturer, the EU type approval system for motor vehicles and parts, which has already taken over many UN ECE regulations, determines everything to the last detail. The automotive supplier industry, when consulted on the alternatives, has therefore declared that they prefer to include automotive pyrotechnic devices in the planned Pyrotechnics Directive, which follows the “new approach” option described hereafter, rather than in the EU type approval system.

Essential safety requirements, CE marking and subsidiarity

Fireworks

The impacts of this approach on the main pyrotechnic sectors of fireworks and automotive occupant restraint systems will be positive. In the case of **fireworks**, it is expected to lead to a **considerable reduction in costs** as a **single CE assessment of conformity** will replace up to 25 parallel national approval procedures. These potential cost savings will not only apply to importers, but equally to EU based manufacturers of fireworks.

In the case of **automotive occupant restraint systems** it is also expected to be **saving costs for industry** while improving safety for consumers.

Under the proposed Directive the procedure for the attestation of conformity involves a type examination (Module B) and either a conformity to type declaration (Module C), product quality assurance (Modules D or E), product verification (Module E) or unit verification (Module F). The essential safety requirements contained in the proposed Directive are similar to those currently contained in the national legislation of most Member States. Indeed, they are also broadly similar to those standards currently being developed by CEN. As a result, it might be expected that the cost of type testing a firework according to the proposed Directive will not differ significantly from the current situation in some Member States and may be in the range of €500 – €3,000 per firework.

For importers, more harmonisation will make it easier to comply with the legislation in different Member States. Harmonised rules will therefore act as a deterrent to illegal imports and distribution. As mentioned above, the vast majority of fireworks on the EU market are imported into the EU from China. For these fireworks, in addition to the compulsory type examination (Module B) it is anticipated that manufacturers will choose the option of conformity to type (Module C) whereby Notified bodies ensure and declare that the pyrotechnic articles are in conformity to the type described in the EC type examination certificate. In this situation, it is anticipated, that the Notified Bodies will develop sub-contractual arrangements with competent Chinese bodies. If parallels are drawn with Directive 93/15/EEC on the placing on the market and supervision of explosives for civil uses (a new approach directive using similar procedures to those in the proposed Directive), it might be expected that Notified Bodies will carry these arrangement out on the basis of a 6 month visit followed a visit one year later and then 2 yearly visits thereafter. If problems are discovered by the Notified Bodies, visits will return to a six monthly schedule.

Some have estimated that there may be as many as 50,000 different types of approved fireworks currently in use in the EU. Based on this estimate a total cost for the type approval of fireworks might be in the range of €25 million to €150 million. However, these costs must be viewed against the current costs of obtaining national approval in 25 Member States for the same 50,000 fireworks.

It should also be noted that many of these fireworks are very similar. The differences may only be the sequencing of colours or a different combination of shots in a firework cake (a single ignition multi-shot article). Given that the differences are often only minor, the Commission believes there is scope for grouping fireworks according to their dimensions and performance characteristics. As a result, it may be possible to significantly reduce the costs from the range quoted. The range should, therefore, be viewed as very much a worst-case. The Commission will consider with expert stakeholders how cost reductions through grouping might be achieved.

As far as accidents are concerned, the approach based on essential safety requirements and CE marking will have considerable advantages. Market surveillance at national level will be made easier, and coordinated market surveillance actions at EU level will be made possible. This is of crucial importance, taking into account that statistics from the Netherlands have shown that only 10 % of illegal fireworks have been intercepted in recent years. The introduction of higher minimum age limits in some Member States will also have a positive effect, and the labelling requirement will lead to better informed and therefore more careful consumers.

Automotive occupant restraint systems

Many Member States have different approval processes for the placing of inflators, modules and safety devices for automotive and other uses on their markets. These approval processes currently use national regulations and laws for the approval of these products.

The proposed Directive would create a single market for these pyrotechnical articles. This is expected to result in the elimination of barriers to trade currently caused through national provisions in place throughout the EU and to avoid unfair competition. It is expected to lead to a considerable reduction in costs as a single CE assessment of conformity will replace up to 25 parallel national approval procedures.

Total harmonisation

The total harmonisation approach would have the same positive economic effects as the option described here above. However, it would not be very flexible and could not take into account the different cultural traditions of the Member States. It would therefore have to be either very restrictive, following the policy of those Member States which have an almost total ban on sales to the public of fireworks or it could lead to increased accidents because members of the general public in certain Member States would not have the necessary know how to use fireworks. It would also be highly unlikely that the Council could agree to such an approach because a number of Member States are very anxious to keep their national restrictions on certain types of fireworks (e.g. bangers).

5. Monitoring the results and impacts of the proposal after implementation

The principal aim of the Directive is to reduce fireworks related accidents while creating a single market for pyrotechnic articles in the EU. The Commission will continue to request accident statistics from the Member States in the framework of the pyrotechnics working group, and will encourage those Member States which do not yet have a system to record fireworks related accidents to set one up over three years following the adoption of the proposal. Accident data will then be compared regularly in order to assess the effectiveness of the Directive. The benchmark will be a clear reduction in fireworks related accidents after the implementation of the Directive.

The Commission will also monitor the cost for fireworks and automotive pyrotechnics approvals in different Member States in order to ensure that cost savings can be realised for those companies which are active on the EU market.

The compliance of industry and importers with the requirements of the Directive will also be monitored. Market surveillance activities of the Member States are essential for the effectiveness of the Directive. In the case of fireworks, Member State customs authorities will have a crucial role to play since most fireworks are being imported from overseas. Within the EU, coordinated market surveillance activities including random testing of products available on the market can also play a role in ensuring that products meet the essential safety requirements.

6. Stakeholder consultation

As a working group for pyrotechnic articles at EU level did not previously exist, the consultation process for the Directive was started in May 2003 with the sending out of a questionnaire accompanied by a letter to the Permanent Representations of the Member States, and the Missions of the candidate and EFTA countries. In this letter, the recipients were encouraged to circulate the questionnaire to potential stakeholders, and it was made clear that all persons were free to respond.

A first meeting of a stakeholder working group was organised on 23 September 2003, followed by two more meetings on 1 December 2003 and 16 March 2004 in Brussels. For these meetings, invitations were sent to Member State, candidate country and EFTA member administrations and to those associations which had replied to the questionnaire or which had declared their interest to participate in the working group.

The Pyrotechnics industry was represented by delegates from the European Pyrotechnics Association. The automotive components supplier industry was represented by CLEPA, their European association.

CEN, the European Committee for Standardisation, and in particular its technical committee for pyrotechnic articles have also been closely associated with the preparation of the Directive, notably in the drafting of the essential safety requirements, which was finalised at a meeting hosted by the Netherlands in Delft on 17 to 18 November 2003.

Several earlier drafts of the Directive were widely distributed by the working group participants, and subsequently comments were received not only from the public authorities in charge of pyrotechnics but also from several industry associations and individual companies (fireworks, automotive component suppliers and aerospace sectors). The Euro Group for Animal Welfare also requested a copy of the Directive and has received it but no comments have been received from them yet.

In principle, most Member States and the associations of the pyrotechnics industry and the automotive component suppliers welcome the initiative for a Directive on pyrotechnic articles.

However, the competent authorities of the UK and Sweden were more reluctant, because they are of the opinion that EU legislation in this area is not necessary and potentially too costly for local manufacturers, a point of view supported by some UK pyrotechnics manufacturers (although this would very much depend on how much the national notified bodies would charge per approval).

Malta in principle supports the Directive, but has requested exemptions for hand made fireworks used at religious festivals and which are not sold on to consumers. The Commission should be prepared to discuss this issue during the meetings in the Council working group following the adoption of the draft proposal.

While the European automotive component suppliers have explicitly requested that airbags and other pyrotechnic car safety equipment be included in the scope of the Directive, there was a request to exclude aerospace parts because they were already covered by other international rules. The Commission has therefore adapted its proposal in order to take these comments into account.

The main discussion with the Member States during the working group meetings concerned the question in how far Member States could maintain national restrictions on the sale and use of certain categories of fireworks.

Since there are markedly different cultural traditions when it comes to fireworks, the proposal foresees the possibility for Member States to restrict the use and/or sale to the public of category 2 and 3 fireworks.

Some Member States also want to be able to restrict the use and/or sale of category 1 fireworks, from which there is by definition only very little risk. While the Commission cannot accept this in principle, since it is necessary to create internal market conditions for this product group, the Commission is prepared to give a new mandate to CEN in order to redefine category 1 and to work on a list of those articles which can be regarded as harmless by all Member States and which should subsequently be able to circulate freely on the internal market.

Another controversial issue raised by a number of Member States was that of the minimum age limits. However, the Commission has made it clear that these are minimum requirements and that the Member States will have the right to impose stricter limits if they deem it necessary. For those Member States which do not yet have minimum age limits for the sale of fireworks to end consumers however, these minimum age limits are expected to have a positive effect on the number of fireworks related accidents.

7. Commission draft proposal and justification

Based on the assessment of impacts from the different options, the Commission has decided to make a proposal following the “CE marking and subsidiarity” option.

The Directive will set out essential safety requirements for pyrotechnical articles with Member State competent authorities assessing the compliance of these articles against the requirements. Articles which are assessed as meeting the safety requirements will receive a CE mark **guaranteeing their free circulation within the EU** whilst at the same time ensuring **a high level of protection to consumers**.

The CE marking will improve the safety of pyrotechnic articles, and will make the enforcement activities of Member States easier.

The proposed Directive will also create a single market for pyrotechnical articles. This is expected to result in the elimination of barriers to trade currently caused through national provisions in place throughout the EU.

The main benefits are therefore reduced burdens on industry through a harmonised approval system for the approval for the placing of pyrotechnic articles on the market along with the creation of a single market and a high level of consumer protection through compliance with the essential safety requirements.

Total impacts table of the Commission's proposal

	Qualitative Description	Quantitative Description	Monetised Value
Economic impacts			
Fireworks	Considerable cost savings for companies which serve the entire EU market – only one instead of potentially 25 approval procedures	Affects a market of € 1.4 billion per year. Costs for one fireworks approval: € 500 – 3000 per firework.	Overall costs under new system: about €25 million, needs to be compared to costs for obtaining up to 25 different national approvals.
Automotive pyrotechnic articles		Affects a market of € 5.5 billion per year. Costs for one airbag approval (Germany): Administrative fee: € 1500 – 2000 Samples needed for destructive testing: € 10,000 Sum including internal costs: € 25,000	Similar or lower costs under the new system due to increased competition of testing authorities. Only one test series necessary for entire EU.
Social impacts			
Consumer impact - Fireworks - Automotive pyrotechnic articles	Compliance with the essential safety requirements will improve the safety of pyrotechnic articles, CE marking will make improved enforcement possible.	The aim is to create a downward trend in fireworks related accidents, resulting in considerable cost savings.	
Employment - Fireworks - Automotive pyrotechnic articles	Positive effects for companies making use of the EU internal market (less administrative costs, more sales), possibly negative effects for only nationally oriented companies due to more	Overall effects: neutral to employment	

	competition.		
Environmental impacts			
	Enforcement of the Seveso Directive will be made easier by uniform labelling requirements across EU.	In case of prevention of a major accident: considerable cost savings.	