

## EIG Brief Guide #13: Explosives classification

The agreement by the Department for Transport (DfT) and their agents for classification in the UK (HSE and ESTC) that it is no longer necessary for UK companies to hold explicit UK classifications for items that have a current classification awarded by an ADR signatory is sometimes misunderstood.

We are working to get this principle applied across all ADR signatory countries – but this ideal position (which is embedded in the spirit of ADR) may take some time to achieve.

### Manufacturing, importing and transporting explosives in the UK

Where an explosive has a valid classification issued by an ADR Signatory country, and which is in a form “easily understood” by UK enforcing authorities there is **no need** to apply to HSE or ESTC for that product to be reclassified in the UK. Obviously this provision is most likely to be relevant to items imported into the UK – but this does not have to be the case. In some situations it may be preferable for a UK manufacturer to obtain a classification for a UK manufactured explosive from a Competent Authority outside the UK (either for practical or economic reasons).

In all such cases it is important that the manufacturer or importer keeps a copy of the relevant Competent Authority Document (CAD), either translated into English, or where the important information is in such a form (eg a table of part numbers, descriptions and classification) that it is not language specific and is unambiguous.

A copy of such a CAD may be requested by an enforcer in the UK as demonstration that not only is the product properly classified, but that it is being stored and transported in line with that classification.

### Exporting from the UK

Unfortunately the position of DfT in the UK is not yet mirrored across the remainder of ADR signatory countries – although we are hopeful that in due course all ADR signatories will accept that while ADR requires an explosive to be classified it does not require that explosives be classified separately and independently by all relevant authorities.

Hence, for the time being, it is important that any exporter of explosives ensures that the country to which the explosive is being exported (and also in some cases the countries through which it is being transported) will accept CADs issued by HSE or ESTC (depending on whether it is a civil or military explosive) or any other competent authority of an ADR signatory as evidence to support a classification in that country.

### Further information

EIG issued 2 guides on the requirements of the changes in the UK's position. They differ only because of separate transport regulations in parts of the UK.

UK (except Northern Ireland) - <http://www.eig.org.uk/eig2007/?p=271>

Northern Ireland - <http://www.eig.org.uk/eig2007/wp-content/uploads/ICoP%20v2.17%20NI.pdf>

