

Security of Explosives in Transport

Industry Guidance and Aide Memoire for DfT & HSE Inspectors for Licenced Explosives Sites

The Health and Safety Executive Explosives Inspectorate (HSE) and the Department for Transport (DfT) have previously agreed the division of roles and responsibilities in respect of the security of explosives during the entire transport logistics train. This guide updates the information in light of the publication of the Explosives Regulations 2014 (ER2014) and the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (as amended) (CDGUTPER).

Security in the manufacture and storage of explosives in the UK is regulated by ER2014 - specifically by Regulations 30-38. HSE have issued guidance (L151) which provides overarching information applicable across the explosives sector on security provisions.

Security during transport in the UK is regulated by CDGUTPER which enacts the security provisions of the European Agreement on the Transport of Dangerous Goods (ADR) Chapter 1.10.

There is potential for HSE and DfT inspectors (and other enforcing authorities) to provide duplicated information on security considerations regarding the transport of explosives during their enforcement activities. This guide clarifies where the demarcation lies between security on licenced explosives sites and security during transport.

If any enforcing authority comes across issues that are the responsibility of any other they should note details and advise the other authority/authorities so that a consistent opinion can be provided to the dutyholder.

HSE and DfT have agreed the following demarcation of roles and responsibilities:

HSE or other licencing authority under ER2014	DfT under CDGUTPER
On site security in relation to manufacture and storage (<i>Note 1</i>) <ul style="list-style-type: none">• Building security• Site security• Intruder detection• Traceability• Record keeping• Loss reporting• Management arrangements for security on-site• Identification of civil explosives• Records in relation to relevant explosives	Security of High Consequence Dangerous Goods in transport <ul style="list-style-type: none">• Recruiting of transport personnel• Training of transport personnel• Company procedures for transport of explosives• Planning of journeys for explosives• Unauthorised access during carriage and temporary storage (<i>Note 1</i>)• Vehicles incl. unloading & detaching trailer on site• High Consequence Dangerous Goods in transport incl. restricting the release of transport information• Security Plan and Risk Assessment

Note 1 – Security during the storage of explosives is enforced by HSE or other bodies under ER2014; security during the keeping explosives that are being transported and the temporary storage of other classes of High Consequence Dangerous Goods (except Class 7) is the responsibility of DfT. Where during transport an explosive is, or is to be, kept at any place for more than twenty-four hours that keeping is to be treated as storage within the meaning of ER2014.

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