

Hazardous Installations
Directorate

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Dear Competent Authority Document holder,

ASSIGNMENT OF CLASSIFICATION FOR TRANSPORT OF FIREWORKS

Following discussions with sector representatives I recently instigated a review of HSE's approach to administering the assignments that it makes for the classification of fireworks for transport.

At this point some change is possible. Therefore with immediate effect, all of the Competent Authority Documents (CAD) that HSE issues when it assigns or re-validates classifications for the transport of fireworks will now be valid for 10 years rather than the existing 5 years.¹ This will benefit business by reducing the burdens on the sector from current arrangements.

HSE will continue to ask CAD holders to review the articles listed on CAD schedules as the CAD approaches the end of its period of validity. This is needed to verify that the assigned classifications for fireworks remain valid and in line with HSE's administration of the ADR requirements and specifically that:

- the data provided to HSE and used as the basis of the classification assignment has not changed;
- the manufacturer has not changed ; and

¹ Subject to any fundamental change to the classification criteria for explosives as they appear in Chapter 2 of ADR and in the UN Manual of Tests and Criteria.

- any changes to Chapter 2.1 of ADR since the firework was originally classified have been considered ensuring the classification either:
 - remains as originally assigned; or
 - is changed to a different hazard division.

HSE will continue to work with sector representatives to identify additional ways to improve the classification process. It will also review with the sector how the information held on the classification status of individual fireworks can best be made available to manufacturers, importers, distributors, users and regulators.

On a related matter I asked for an analysis of the applications submitted to HSE for the classification of fireworks over the last 12 months to ensure that we were processing these as effectively as possible.

I am pleased to see that when applicants provide all of the information necessary for completing an assignment with the application 92% of CADs are agreed within 20 working days and the average time to process an application to the point where the CAD is agreed is 12.5 days. Unfortunately only 46% of the applications we receive are accompanied at the outset by all of the information necessary to complete the classification assignment. This means that we have to seek further information from applicants which lengthens the process and means additional cost to the applicant.

I have therefore attached a set of 'top tips' that I hope will help you to help us to progress any future applications you make more quickly. Further guidance can also be found at www.hse.gov.uk/explosives/classification/index.htm, and www.hse.gov.uk/explosives/frequently-asked-questions.htm.

Yours faithfully



Dr Richard Daniels
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Classification of Fireworks by UN Default – Top Tips

General:

1. Ensure the English translation is provided on the drawings for all the components in the firework.
2. Ensure the compositional information is completed fully and the quantities are accurate e.g. in the tables on drawings.
3. Ensure the firework type is correctly identified and that the appropriate dimensions are provided – cross reference to the UN default table and HSE web-site.
4. If non-blackpowder compositions are used to produce an aural effects or as a bursting charge or lifting charge and are **not** to be considered 'flash composition', HSL Flash Composition Test data must be provided which shows the pressure rise time is greater than 6 ms.
5. Ensure that the spreadsheet and drawings match / are consistent with each other.

Use of Mitigatory Packaging:

1. Ensure the technical details of the mitigatory packaging is provided including external dimensions, thickness of wire, size of mesh and banding arrangements, preferably with an illustrative drawing. This information will be transferred to the front sheet of the CAD.
2. Ensure full series 6 test results(ie (a), (b) & (c)) are provided - due to the additional confinement provided by the mitigatory packaging.
3. Ensure the orientation of the packages when tested covers the worst case e.g. 5 sided mesh
4. Where analogy is claimed against a tested item, information should be provided on a comparative basis for:
 - the total NEQ;
 - individual item NEQ; and
 - the % flash composition.

All three of these should be less than the tested item