

CHAPTER 20

INSPECTION OF EXPLOSIVES FACILITIES AND EXPLOSIVES MANAGEMENT SAFETY

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1 PURPOSE OF INSPECTIONS

1.1 Introduction

1.1.1 The purpose of periodically inspecting explosives areas and PES is to ensure that MOD Explosives Regulations are being complied with and that explosives facilities are fit for purpose. Compliance with the terms of the Explosives Licence is essential. Should the permitted quantities of explosives be exceeded, or unauthorised operations be carried out, the risk of propagation of fire or explosion between PES may be significantly increased. Similarly, there will be an increased risk to other ES. A system of inspection is therefore paramount in providing visibility to CIE(MOD) and ultimately SoS that explosives safety management within the MOD is beyond reproach.

1.1.2 PES structures are normally purpose built to approved design specifications and may also incorporate special features such as traverses, blast walls, earth coverage and electrical or other installations of specific standards. If a PES is allowed to deteriorate, there may be an increase in the hazards to the explosives stored. Moreover, the PES will also present a greater hazard to personnel and property at an ES, and, ultimately, the Explosives Licence may have to be suspended or withdrawn.

1.1.3 This Chapter prescribes the inspections and management checks that are necessary to preserve explosives safety at MOD explosives establishments and facilities. These fall into 5 groups:

- (1) Internal, conducted by the unit/establishment under the auspices of the HoE.
- (2) Specialist Inspections conducted by appropriate authorities.
- (3) External, conducted by IE staff.
- (4) External, conducted by CIE (MOD) staff.
- (5) Those conducted by the Health and Safety Executive (HSE).

1.2 Internal Inspections

1.2.1 The internal inspection, discussed in detail at paras 2 below, is primarily designed to provide an inspection regime for the internal and external condition of PES and associated infrastructure (including fire fighting and electrical equipment and lightning protection systems). Additionally, it ensures the correctness of contents, that appropriate forms and posters are displayed and the observance of all applicable regulations. This process assures HoE on the condition of the estate and safety management systems.

1.3 IE Inspections

1.3.1 The IE is responsible for ensuring the continued safe storage, processing and use of explosives within the area of responsibility. The IE is to regularly inspect their units to ensure compliance with MOD Explosives Regulations and other related Health and Safety legislation. This type of inspection is discussed in detail at paras 3 below.

1.4 CIE(MOD) Inspections

1.4.1 The Chief Inspector of Explosives (MOD) (CIE (MOD)) is responsible for ensuring the continued safe storage, processing and use of explosives within the MOD and to give assurance to Secretary of State. CIE (MOD) reserves the right to conduct inspections of IE Inspector activities.

1.5 HSE Inspections

1.5.1 Under the Health and Safety at Work Act 1974, HSE may visit any site after contacting the HoE. This procedure is detailed fully in JSP 375, Vol 1, Chapter 8. HoEs are to ensure that the appropriate IE is informed of any planned HSE inspections of MOD explosives facilities. If practicable, the IE will then arrange for his inspection staff to be made available to the unit concerned to act as the escort and also to provide an interface between the HSE Inspector and the unit concerned. Once received, a copy of the HSE report is to be forwarded to DCIE (MOD).

2 INTERNAL INSPECTIONS

2.1 Implementation

2.1.1 In order to ensure continuing explosives safety at units, internal inspections are to be carried out to:

- (1) Ensure that explosives are stored in accordance with the regulations in this publication, and,
- (2) Monitor the condition of each PES and Explosive Storage Areas.

2.1.2 These internal inspections are to be carried out using the guide at Annex A Appendix 1, at least monthly, by competent personnel who are formally designated by the HoE. All personnel are to report automatically to their line management any structural or other defect, or any other irregularity, that may affect the integrity or safety of any PES.

2.2 PES Log Book

2.2.1 The results of the inspections, defects/damage to buildings and equipment, etc, are to be recorded in the PES Log Book (PLB) in the manner prescribed in Annex A.

2.2.2 At not less than 3 monthly intervals, the PLB is to be examined by the HoE's Explosives Safety Representative for correct compilation, and the examination recorded in the PLB. Additionally, the HoE's Explosives Safety Rep is to regularly monitor, by inspection where necessary, structural, storage and processing standards, and ensure any necessary repairs or other observations receive adequate attention. In pursuance of maintaining PES in a fully serviceable condition, he is to bring to the attention of the HoE all outstanding work services materially affecting PES. This notification may be either in the form of a computer printout from an approved Estates Management system, by using the PLB, or by some other mechanism approved by the responsible IE.

2.2.3 IE Inspectors will check the PLB for accuracy during their inspection, and will also investigate the efficacy of the unit measures for scheduling repairs to PES. Prolonged PES unserviceability, particularly if the structure is compromised, may result in the withdrawal of the Explosives Licence or the imposition of constraints against the future use of the PES.

2.3 Inspection of Explosives Facilities with Temporarily Suspended Explosives Licence

2.3.1 Explosives Facilities that have had their Explosives Licence suspended for a period of less than 6 months are also to be inspected at least monthly. Where defects are found that will materially affect the EF, i.e. weatherproofing or structural soundness, these are to be progressed as if the EF was licensed.

2.4 Inspection of Explosives Facilities with Explosives Licence Withdrawn

2.4.1 The inspection requirements for Explosives Facilities which have had their Explosives Licence either withdrawn for a predicted period greater than 6 months, or not yet issued, or for which the licence will only be issued/reissued at a predetermined Alert State/measure, are to be detailed in writing by the appropriate IE. A copy of the IEs inspection directive is to be held with the PLB.

2.4.2 The frequency of the inspection will be dependent as much on the climatic conditions prevailing and the type of Explosives Facilities as anything else. The inspection is to be in accordance with para 2.1.1, but the periodicity of the inspection may be extended to a maximum of 6 monthly intervals. Where defects are found, their rectification may be delayed providing the Property Manager agrees that they will be carried out within the required reactivation time scale. Where defects are found that will materially affect the weatherproofing of the Explosives Facilities, or the structural soundness, they are to be progressed as if the Explosives Facilities were in use.

2.4.3 After 6 months, all standard and specialist inspections are to be implemented prior to re-use.

2.5 Minor and Parented Units without Established Competent Inspection Personnel

2.5.1 Some minor units do not have major explosives facilities, but do have PES licensed in accordance with Chapter 9. Increasingly, a number of these units are not established with competent inspection personnel, or are parented by a unit a considerable distance away (in terms of time and/or mileage), and therefore have difficulty in complying with the normal inspection requirements detailed above. The strict control and regular inspection of PES is necessary to ensure that the fabric of buildings, the explosives and equipment in them, quantity distances (where applicable), security and safety arrangements, etc, meet the requirements of MOD Explosive Regulations. Safety is of paramount importance and cannot be prejudiced on the grounds of cost alone. In these cases, IEs, in consultation with DOSG staff where appropriate, are to make suitable alternative arrangements.

2.6 Specialist Inspections

2.6.1 The following Special Inspections are to be carried out:

- (1) Lightning Protection Systems (LPS). LPS are to be inspected and tested in accordance with Chapter 8 and ESTC Standard 6..
- (2) Electrical Installations. The Electrical Installations in any PES, or in any buildings containing non-explosive items located within an explosives area, are to be inspected and tested in accordance with Chapter 8 and ESTC Standard 6.
- (3) Conducting/Anti-Static Floors, Earthing Mats and Bonding Systems. Conducting/Antistatic floors, earthing mats and bonding systems, including bonding leads where applicable, are to be tested in accordance with Chapter 8.
- (4) Installed Lifting Appliances. Lifting appliances are to be inspected and tested in accordance with Lifting Operations and Lifting Equipment Regulations (see Chapter 6).
- (5) Building and Civil Engineering Inspections. Technical Inspections are to be carried out by a suitably qualified Engineer/Technician at 2 yearly intervals. Professional Appraisals are to be carried out at 5 yearly intervals by a suitably qualified independent engineer or specialist. ESTC Standard 6 details the inspection criteria and must be complied with. Where

structural deterioration is evident or suspected this periodicity may be reduced with the advice of the Engineer/Technician/Specialist. Further advice may be obtained from Technical Advisor (Structures) who can be contacted through the relevant licensing authority.

2.6.2 Results of all Special Inspections, including any test readings or copies of test certificates, are to be entered into the PLB. Copies of all test certificates are to be retained with the PES Log Book for a minimum of 11 years.

2.7 Inspection of First Aid Fire Fighting Appliances (FAFFA) and Fire Alarms

2.7.1 FAFFA. First Aid Fire Fighting Appliances (FAFFA), including beaters and pre-positioned engine/motor driven pumps and hose reels/hydrants, are to be inspected in the manner, and at the periodicity, determined by the unit Fire Focal Point (see Chapter 15). FAFFA inspections are to be recorded.

2.7.2 Fire Alarms. Fire alarm systems are to be maintained in accordance with Chapter 15 and the manufacturer's recommendations. Electrical fire alarm systems are to be tested weekly under unit arrangements, and the test recorded. All alarm points are to be tested during any 3 month period.

2.8 Security Inspections

2.8.1 These should be undertaken in accordance with the policy set by JSP 440, the Joint Service Security Manual and TLB Principle Security Advisers. This is to include regular inspecting and testing of the security alarm system where fitted.

3 IE INSPECTIONS

3.1 Periodicity and Programming

3.1.1 IEs are to arrange the conduct of inspections at all areas with licensed explosives facilities at intervals not exceeding two years. AT IE's discretion, this may be extended to 3 years for units holding SAA only. A programme of unit IE inspections is to be raised by each IE at regular intervals, normally annually, and copied to CIE (MOD).

3.2 Inspector's Disclaimer

3.2.1 The following Inspector's Disclaimer statement is to be inserted into the inspection report at an appropriate point in the introduction:

"The following inspection report has been compiled by (Insert Inspector full name and appointment) under the authority to conduct Inspections of Explosives Safety Management and Explosives Facilities, on MOD controlled sites, granted in Chapter 3 Para 1.12. The inspection has been conducted in accordance with the criteria laid down in Chapter 20. The inspection covers the management and control of explosives and explosives facilities in accordance with those regulations and any other MoD regulations that may be incidental to JSP 482 MOD Explosives Regulations. The inspection has been a sample of the documentation, facilities and activities. It is to be noted that there may be documentation, facilities or activities unobserved by the inspector that remain non-compliant with JSP 482 MOD Explosives Regulations."

3.3 Scope of Inspection

3.3.1 The IE Inspector is to check unit compliance with MOD Explosives Regulations, explosives safety management and relevant Health and Safety legislation. In particular, he will examine those areas detailed in Annex B. However, this list is not intended to be exhaustive and Inspectors are free to examine any aspect of explosives safety management or unit procedures.

3.4 Grading

3.4.1 Before leaving the unit, the Inspector is to advise the HoE of his findings together with the grading. Following the inspection, the IE Inspector is to compile a report and award the unit an overall grading of either SATISFACTORY or UNSATISFACTORY. An overall grading of UNSATISFACTORY will normally be awarded when:

- (1) Safety, security or reliability is seriously degraded.
- (2) Standards of management are lower than could be reasonably expected, such that explosives safety could become impaired.
- (3) Inadequate progress has been made to eliminate a deficiency that was commented upon in a previous report but did not, necessarily, attract an unsatisfactory grading at that time.

3.4.2 The inspection is to be conducted in accordance with the Criteria Sheet shown at Annex B. Copies of unsatisfactory reports are to be forwarded to Deputy CIE (MOD) through the IE.

3.5 Follow-up IE Inspections

3.5.1 When an overall grading of unsatisfactory is awarded, a follow up inspection is to be carried out, normally within 3 months, to confirm that the actions placed on the unit to remove the unsatisfactory features have been completed.

3.6 Progress of Outstanding Actions

3.6.1 The IE Inspector may demand routine progress reports on some outstanding actions pending their satisfactory completion. Where the Inspector has requested such an update, units are to advise the relevant IE on their progress as directed by the IE.

4 OTHER TESTS

4.1 Public Address Systems

4.1.1 Where fitted, public address systems are to be tested in accordance with Chapter 8. Where specific guidance is not available, a weekly test broadcast is to be made.

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ANNEX A

THE PES LOG BOOK

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- 2 Completed Example of PES Inspection Record
- 3 Blank PES Inspection Record
- 4 Example of PES Temperature and Humidity Record

1 PES LOG BOOK

1.1 Introduction

1.1.1 All units (including those sited out of area) with licensed PES are to maintain PES Log Book(s) (PLB)¹. Units with many PES may produce a single PLB for a set manageable number (e.g. 30), units with more than one small explosives storage site or hardened aircraft shelter (HAS) site may hold a separate PLB for each site and not for each PES within these sites.

1.2 Compilation

1.2.1 The PLB(s) should be kept in the site office or other structure outside IBD, and consist of, or make reference to the following:

- (1) Outer Cover.
- (2) PES Inspection Record Sheet. This form is to be maintained for each PES. Additionally a further copy of this Form is to be maintained for the Explosives Storage Area (ESA), for the purposes described in para 2.2.1. An example is at Appendix 2.

¹ It should be noted that it is the intention, driven by Defence Estates, to have an individual Log Book for each PES. This will contain a locally produced Inspection Record Sheet, Humidity Record, Temperature Record, and all the paperwork associated with ESTC Standard 6. This is not a requirement for TA Centres or Cadet Facilities storing SAA only.

- (3) Humidity Record. This Form is to be maintained for those PES requiring controlled humidity and reported in PLB when outside approved tolerances. An example is at Appendix 4.
- (4) Temperature Record. This Form is to be maintained for those PES requiring controlled temperature and reported in PLB when outside approved tolerances. An example is at Appendix 4.
- (5) "As fitted" 1:50 or 1:100 electrical services plan layout drawings as appropriate showing the extent and zone(s) designation of the explosives storage area / facility².
- (6) Electrical single line schematic drawings with circuits, etc related to the Inspection and Test record sheets 1 to 7 (see footnote 2).
- (7) Inspection and Test Record Sheets 1 to 7 (see footnote 2).

2 COMPLETION

2.1 General

2.1.1 Inspections are to be carried out against the Standard at Appendix 1. At each inspection of the PES, the relevant items in the inspection column on the front of the Inspection Record Sheet are to be completed **in ink** with either a ✓ to indicate the item is correct or a red X to indicate that the item is unsatisfactory. Rows that are not relevant to the PES concerned are to be ruled through.

2.2 Actions for Defects or Unsatisfactory Conditions

2.2.1 Details of defective or unsatisfactory conditions are to be recorded on the reverse of the PES Inspection Record Sheet, and cross-referred to the relevant item number on the front of the form. Defects are to be reported to the unit Estate Management Organisation and the resulting works services serial number recorded on the reverse of the Inspection Record Sheet. A red cross (X) is to be placed in the relevant item number at each inspection until the work is completed and signed off or the unsatisfactory condition otherwise cleared. Observations and defects that are specific to the ESA (e.g. roads, fences, traverses and emergency water supplies) are to be recorded on the Inspection Record Sheet for the site.

2.3 Recording of Special Inspections

2.3.1 Results of special inspections, (see Chapter 20, paras 2.6) are to be recorded on the reverse of the Inspection Record Sheet and copies of the relevant test certificates retained within the PLB.

2.4 Recording of Fire/Escape Drills

2.4.1 Whenever fire or escape drills are practised, details are to be recorded on the reverse of the Inspection Record Sheet for the PES concerned. Completion of any actions required by the post drill recommendations is also to be recorded. Drills for the storage site as a whole are to be recorded on the Inspection Record Sheet for the site. These records are to be completed over and above any records called for by the unit Fire Focal Point.

² As detailed in ESTC Standard 6 "Requirements for the commissioning, inspection, testing and maintenance of works for explosives facilities".

2.5 Retention

2.5.1 Completed Inspection Record Sheet are to be retained for 11 years to enable a history of each PES to be compiled which will indicate any trends that may require major rectification. IE Inspectors and Defence Estates staff will carry out visits at periodic intervals and review the historic data and may recommend action as the result of any visit.

2.5.2 When a new Inspection Record Sheet is raised, all outstanding defects and special inspection results are to be transcribed from the previous form.

2.6 IE Inspection

2.6.1 The PLB may be examined by the IE Inspector during unit IE Inspections. He will sign the relevant pages of the PLB for the PES that he has inspected.

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ANNEX A

APPENDIX 1

**GUIDE FOR THE MANAGEMENT AND INTERNAL INSPECTION OF EXPLOSIVE
SITES AND PES**

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1 INTRODUCTION

1 INTRODUCTION

1.1 The purpose of this Appendix is to provide a ready reference guide for the periodic inspection of explosives facilities. When read in conjunction with the relevant Chapters of this JSP and elsewhere, this guide will permit a general overview of the requirements for safety and efficiency and the structural integrity, etc, of PES.

1.2 It is stressed that there is no substitute for intimate knowledge of the regulations in this JSP, and to this end all those involved with the management and organisation of explosives facilities should familiarise themselves with all of the regulations. References are to chapter and paragraph unless otherwise stated.

1.3 The Checklist is detailed over the page.

CHECK LIST FOR INTERNAL INSPECTION OF EXPLOSIVES SITES

Inspection Record Sheet Serial No and Subject	Detail ³
1. State of Repair	Check - security fence; security lights for damage and corrosion; building structure for any damage, state of paint work, and all attachments and fittings for damage and corrosion; roads/sidings for damage/pitting, rubble, etc; general storm damage. Are doors serviceable? Are designated areas/Safe Headings suitably demarcated?
2. Cleanliness	Ensure all PES and their immediate adjacent areas are clean and tidy and free from wind blown combustibles. Have packaging materials been removed or correctly temporarily stacked so as not to present a fire risk? Have empty boxes, seals, locking wire been removed? Ensure POL, rags, waste paper etc have not been left. Check for accumulations of explosives dust, etc. Separate bins for ferrous & non-ferrous waste. Is doormat present and serviceable?
3. Dampness (Structural/Condensation)	Check all buildings internally/externally for damp patches. Is the roof, especially the eaves, free from mould/fungus? Are there any water erosion marks especially near any electrical fittings? Is the floor area free from water/condensation? Is there damage to fabric of building that allows ingress of water.
4. Windows	Is glass of an acceptable standard? Ensure all stacks are clear of the windows and that sunlight does not bear on any of the explosive stores. Are guard bars fitted and are they free from corrosion and correctly grouted to the window frames? Are the panes free from cracks; if not, are they protectively covered by tape to prevent ingress of moisture pending repair?
5. Drains and Gutters	Ensure building drains and gutters are secure and undamaged, free of grass cuttings, leaves, wind blown foliage, etc, and that drains are clear and free from restrictions. Check drains/drain covers in roads, etc, for damage.
6. Heating, Ventilation & Air Conditioning	Ventilators (normally) left open? Check that ventilators are free from corrosion and that they open and close properly. Do they require protective painting, oiling or greasing? Do they have thermal links or an automatic closing device, and are they serviceable? Hygrometers/Max-Min Thermometers serviceable? Data-loggers approved and serviceable? Humidity/Temperature Readings recorded? Heating/Air Conditioning operative. Radiators should have (sloped) guards.

³ Where appropriate
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Inspection Record Sheet Serial No and Subject	Detail ³
7. Traverses	<p>External – Effective? Are there any rabbit holes or mole hills, is it subsiding, are there any areas requiring bracing up, holes filling, grass renewing?</p> <p>Internal – Serviceable and at correct distances from stacks/walls?</p>
8. Locks and Labelling of Keys	<p>Check each bunch for serviceable keys. Are they worn and have they been mustered and rotated with the duplicate/triplicate sets? Ensure locks/padlocks are of approved pattern, serviceable, hasps are free from corrosion, and that they function properly. Do locks require lubrication? Are all key bunches correctly labelled and are individual keys identifiable?</p>
9. Explosives Contents	<p>Check mixing of CGs. Ensure that the appropriate instructions and safety precautions for each type of store stacking system are carried out. Ensure stack cards/pallet/ULC labels correctly identify the make, date, BKI/lot and quantity of each type. ACTO stores stock checked? Are Constrained and Banned/Black Listed stores correctly labelled and segregated? Are all unsealed boxes clearly marked with their remaining quantity, type and lot no (if different from the original markings)? EOD recoveries correctly packaged/stored? Carry out a percentage physical check of packaged/unpackaged stores checking for any damage, dampness or corrosion. No empty packages should be present. Tools/equipment/first aid available where CG 'H' and /or Gaseous Tritium Light Sources (GTS) are present? Non-palletised stores on battens/racking? Gangways/spacing from PES structure in place? ATP/approved schedules in place in Process Facilities?</p>
10. Sealing and Marking of Packages	<p>Ensure explosives packages are correctly sealed, labelled with their contents and display an HCC symbol, UN serial number and PEC markings. Has the correct packaging been used? Have part filled packages been so marked and is sufficient dunnage present?</p>
11. Fire Appliances	<p>Ensure that EWS are full, clear and free from wind blown debris. Ensure FAFFA, to appropriate scale, are correctly positioned at each building and that they are serviceable. Are fire appliances areas clearly marked and painted, are protective boxes serviceable? Check for storm damage, water leaks, defective connectors. Have appliances recently been functionally checked? Are fire beaters serviceable, are there sufficient? Is the Pre-Fire plan up to date? Fire alarm systems maintained and tested?</p>
12. Fire Fighting	<p>Ensure Fire Division Signs and Supplementary Fire Signs, are prominently displayed, legible and serviceable. Do they correctly interpret the hazard of the stored item(s)? Have the fire section/LAFB been informed of any major stock change hazards? Are the fire section/LAFB informed when overnight storage areas are in use and of the associated fire hazard?</p>

Inspection Record Sheet Serial No and Subject	Detail ³
13. Vegetation	Ensure 1m sterile areas round each PES (except earth covered) are clear of grass, foliage, shrubbery, gorse and heather. Are grassed areas sufficiently mown and have all grass cuttings been removed?
14. Licenses and Posters	Check that Licenses and Posters are displayed. Ensure that all contents are authorised to be stored in the PES and that NEQs present do not exceed the authorised limits. Ensure that all tools, equipment and cleaning utensils are correctly listed and authorised. Are ESTC Poster 1B & Contraband Notice prominently displayed at the entrance to all Explosives Areas, or at a common point for groups of buildings, and adjacent to any isolated facilities? Is ESTC Poster 1A (Transport) displayed at staging areas, etc? Actions in event of fire poster (MOD Poster 2) present and correct? Check for special conditions on license. Locally produced SHEF First Aid Poster?
15. Lifting Tackle	Check all chains/cables for damage and corrosion - to be lightly lubricated. Carry out a functional check ensuring that the hoist runways have no restrictions and the raising/lowering mechanism functions correctly. Has the hoist had a mechanical/electrical inspection within the prescribed periodicity (normally 12 monthly) and is it recorded (DWS Spec 005)?
16. Electrical Installations	Standard of electrical installation shown by wall plate mounted adjacent to master switch? Power on light(s) operative? Physically check all lights/luminaires, IDS alarms, fire alarms, telephones, power supply lines/conduit, switches and electrical switch boxes for corrosion, security of fitment, storm damage, etc. Check all lighting and telephones for correct functioning. Ensure electrical tests results (see Chapter 8) were supplied by Property Services Manager, are current and results are entered on reverse of Inspection Record Sheet. RCD and Earth Leakage Circuit Breaker checks carried out? Are electrical powered appliances, leads and earthing cables registered? Have they received their periodic check and can they be promptly identified? Are power plugs and sockets clearly marked for the correct electrical potential? Are they stored neatly when not in use? Public address systems tests?
17. Lightning Protection System (LPS)	Look for evidence of lightning strikes. Check for integrity of bonding - above and below each switch box - to the air terminals - to the ground terminals - to all doors when open/closed. Is all internal bonding properly connected to benches, structures, earth points and electrical hoists? Ensure LPS test is current (see Chapter 8) and that results were supplied by Property Services Manager.
18. Conducting/Anti Static Floors	Have floors been electrically (resistance) checked and results recorded? (See Chapter 8). Are the floors free from cracks, large indentations, excessive wear marks, oil or grease? Is a cleaning regime in place and used? If HAPTM present, is it serviceable?

Inspection Record Sheet Serial No and Subject	Detail ³
19/20. Fire Practices/Evacuation Drills	Are fire practices/evacuation drills recorded on reverse of Inspection Record Sheet and have recommendations been implemented?
21. Incident/Accident Reporting Mechanisms	Are the mechanisms in place for reporting incidents and accidents? Are staff aware of these procedures?
22. Designated Smoking Area	Check that the area in use is authorized, that the ash trays are kept clean and cigarette ends are at a minimum, and that all lighting material is of the authorized type.
23. Empty Box Areas	Empty box compounds are potentially a fire hazard area. Check for poor stacking, over stacking, untidy areas of boxes and furnishings, loose paints, oils, lubricants, labels, fabrics. Are there sufficient fire appliances? Is an excess of wooden boxes being stored? Have all UN markings, HCC labels, etc, been removed or obliterated? CFFE sealed boxes separated from empty boxes/items awaiting CFFE?
24. Outstanding Defects	Check each area/PES record of defects. Is any outstanding defect getting any worse, becoming a safety hazard, repaired to an unacceptable level, or outstanding too long?
25. Documentation	Ensure that the items on the Inspection Record Sheet have been correctly ticked when acceptable and a red cross marked when defective/unsatisfactory. Ensure that all defective items have been reported to the Property Manager and recorded on the record of defects on rear of Inspection Record Sheet. Check that all periodic tests have been recorded, and any fire or escape drills annotated on rear of Inspection Record Sheet.

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APPENDIX 2

COMPLETED EXAMPLE OF PES INSPECTION RECORD SHEET

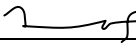
Year: 2002

Unit/Establishment: Little Snoring

Area/PES/Bldg No: West Site 123

Inspection Required Items 1 to 18 & 21 to 25 insert ✓ if correct or X if incorrect Items 19 to 20 insert ✓ when carried out		Month											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1.	State of Repair	✓	✓	X	X								
2.	Cleanliness	✓	✓	✓	✓								
3.	Dampness	✓	✓	✓	✓								
4.	Windows												
5.	Drains and Gutters	✓	✓	✓	✓								
6.	Heating/Ventilation/Air Cond	✓	✓	✓	✓								
7.	Traverses	✓	✓	✓	✓								
8.	Locks and Labelling of Keys	✓	✓	✓	✓								
9.	Explosive Contents	✓	✓	✓	✓								
10.	Marking/Sealing of Packages	✓	✓	✓	✓								
11.	Fire Appliances	✓	✓	✓	✓								
12.	Fire Fighting & Symbols	✓	✓	✓	✓								
13.	Vegetation	✓	✓	✓	✓								
14.	Licenses and Posters	✓	✓	✓	✓								
15.	Lifting Tackle												
16.	Electrical Installations	X	X	✓	✓								
17.	Lightning Protection System	✓	✓	✓	✓								
18.	Conducting/Anti-Static Floor												
19.	Fire Practice		✓										
20.	Evacuation Drill												
21.	Incident/Accident Reporting Mechanisms	✓	✓	✓	✓								
22.	Designated Smoking Area	✓	✓	✓	✓								
23.	Empty Box Areas	✓	✓	✓	✓								
24.	Outstanding Defects	✓	✓	✓	✓								
25.	Documentation	✓	✓	✓	✓								
26.	Additional Items												
Initials		RJH	CK	CK	RJH								
Date		21 Jan 02	18 Feb 02	25 Mar 02	16 Apr 02								
Unit Explosives Safety Officer 3-Monthly Check	Sig				Sig				Sig				
	Date	27 Mar 02			Date				Date				
IE Inspector	Name				Signature				Date				

RECORD OF FAULTS⁴

Date	Item	Nature of Fault/Failure	Reported to and Date	Works Number	Remedial Action Taken	Name and Signature
10 Dec 01	16	Lights inoperative	PROM 10 Dec 01	33241	Bulbs replaced	Bloggs 
25 Mar 02	1	LH door – Upper Hinge broken	PROM 26 Mar 02	34009		

TESTS (ESTC Standard 6 Part 1)

Date	Electrical Installations		Lightning Protection System		Conducting/Anti-Static Floor		Cranes/Lifting Tackle	
	Standard	Result	BS 6651 1999	Result	Type	Result	Type	Result

B&CE INSPECTIONS (ESTC Standard 6 Part 2)

Date	Inspection Type	Findings	Remedial Action
	e.g. 2 yearly		

DRILLS

Date	Fire Fighting			Evacuation		
	Time Alarm Given	Time Appliances in Action	Recommendations/Remarks	Time Alarm Given	Time Bldg/Area Cleared	Recommendations/Remarks
11 Feb 02	0905	0912	LFB arr 0922			

⁴ For HAS, use only to record faults which affect use of the HAS for explosives storage.

CHAPTER 20 ANNEX A
APPENDIX 3
BLANK PES INSPECTION RECORD SHEET

Year: _____ Unit/Establishment: _____ Area/PES/Bldg No: _____

<u>Inspection Required</u> Items 1 to 18 & 21 to 25 insert ✓ if correct or X if incorrect Items 19 to 20 insert ✓ when carried out		Month											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1.	State of Repair												
2.	Cleanliness												
3.	Dampness												
4.	Windows												
5.	Drains and Gutters												
6.	Heating/Ventilation/Air Cond												
7.	Traverses												
8.	Locks and Labelling of Keys												
9.	Explosive Contents												
10.	Marking/Sealing of Packages												
11.	Fire Appliances												
12.	Fire Fighting & Symbols												
13.	Vegetation												
14.	Licenses and Posters												
15.	Lifting Tackle												
16.	Electrical Installations												
17.	Lightning Protection System												
18.	Conducting/Anti-Static Floor												
19.	Fire Practice												
20.	Evacuation Drill												
21.	Incident/Accident Reporting Mechanisms												
22.	Designated Smoking Area												
23.	Empty Box Areas												
24.	Outstanding Defects												
25.	Documentation												
26.	Additional Items												
<u>Initials</u>													
<u>Date</u>													
Unit Explosives Safety Officer 3-Monthly Check	Sig	Sig			Sig			Sig					
	Date	Date			Date			Date					
IE Inspector	Name				Signature					Date			

RECORD OF FAULTS⁵

Date	Item	Nature of Fault/Failure	Reported to and Date	Works Number	Remedial Action Taken	Name and Signature

TESTS (ESTC Standard 6 Part 1)

Date	Electrical Installations		Lightning Protection System		Conducting/Anti-Static Floor		Cranes/Lifting Tackle	
	Standard	Result	BS 6651 1999	Result	Type	Result	Type	Result

B&CE INSPECTIONS (ESTC Standard 6 Part 2)

Date	Inspection Type	Findings	Remedial Action

DRILLS

Date	Fire Fighting			Evacuation		
	Time Alarm Given	Time Appliances in Action	Recommendations/Remarks	Time Alarm Given	Time Bldg/Area Cleared	Recommendations/Remarks

⁵ For HAS, use only to record faults which affect use of the HAS for explosives storage.

CHAPTER 20 ANNEX A

APPENDIX 4

EXAMPLE OF PES TEMPERATURE AND HUMIDITY RECORD SHEET

Year: _____

Unit/Establishment: _____

Building Number: _____

Day/Date	Month:							Month:							Month:																													
	Thermo meter Reading		Hygrometer Reading			Ventilated	Initials	Thermo meter Reading		Hygrometer Reading			Ventilated	Initials	Thermo meter Reading		Hygrometer Reading			Ventilated	Initials																							
	Maximum	Minimum	Dry	Wet	Difference			Maximum	Minimum	Dry	Wet	Difference			Maximum	Minimum	Dry	Wet	Difference																									
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- In column headed "Ventilated" insert V when building is ventilated and X when closed.
- Insert N/A in columns which do not apply.
- This form is to be initialled weekly by the officer in charge in the column headed "Initials".

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CHAPTER 20

ANNEX B

IE INSPECTION CRITERIA

- 1 Outstanding Actions from the Last Inspection Report
- 2 Health and Safety:
 - (a) Policy Statements
 - (b) Organisation and Responsibilities
 - (c) Audits
 - (d) Local H&S Committee Meetings
 - (e) Training
 - (f) COSHH Assessments
 - (g) Control of Contractors
 - (h) Manual Handling
 - (i) Risk Assessment
 - (j) Site Access Protocols
- 3 Explosives Licensing and other Documentation and Publications:
 - (a) MOD Forms 1658/1659
 - (b) MOD Forms 1660
 - (c) Procedures
 - (d) Safeguarding where appropriate
 - (e) Directional Weapons Map where appropriate
 - (f) RADHAZ Map where appropriate
 - (g) Site Map
 - (h) PES Log Book
 - (i) Posters and other Forms
 - (j) Publications
 - (k) COER Certification and/or Section Five Fire Arms Authority (if applicable)
- 4 Security:
 - (a) Intruder Detection System
 - (b) Control of Entry
 - (c) Custody of Keys
 - (d) Exclusion of Prohibited articles
 - (e) Security Fences
- 5 Fire Precautions:
 - (a) Maintenance of Fire Fighting Equipment
 - (b) Control of Vegetation
 - (c) Fire Breaks
 - (d) Fire Plan and Fire Orders
 - (e) Fire and Evacuation Exercises
 - (f) Liaison with Local authority Fire Brigade

- (g) Fire Alarm systems
 - (h) Display of Fire Division Signs and Supplementary Fire Signs
- 6 Electro-Static Precautions:
- (a) Conducting/Anti-Static Regime
 - (b) Bonding System
 - (c) Hazardous Area Personnel Test Meters (HAPTM)
 - (d) Earth Leakage Circuit Breakers (ELCB)
 - (e) Residual current Devices (RCD)
- 7 Infrastructure:
- (a) Building Structures
 - (b) Glazing
 - (c) Traverses
 - (d) Electrical Appliances
 - (e) Lightning Protection System
 - (f) Heating, Lighting and Air Conditioning
 - (g) Lifting Appliances
 - (h) ESTC Standard 6
- 8 Disaster plan:
- (a) MACR Applicability
 - (b) First Aid Provision
 - (c) Emergency Plans
 - (d) Evacuation
 - (e) Pollution Control
 - (f) Control Mechanisms
- 9 Operation of Facilities:
- (a) Sealing, Marking and Labelling of packages
 - (b) Housekeeping
 - (c) Free from Explosives Certification
 - (d) Conditions of Storage
 - (e) Explosives Processing, Handling and Storage
 - (f) Vehicles, MHE and Transportation
 - (g) Safety Precautions/First Aid provision
 - (h) Disposal of Explosives by Demolition and Burning
 - (i) Disposal of Unserviceable stock
 - (j) Segregation/Isolation/EOD Recoveries
 - (k) Waste and Pollution Management
- 10 Parenting Responsibilities (where appropriate)
- 11 Provision of specialist/competent personnel on Unit Establishment Documents
- 12 Training

CHAPTER 20

ANNEX C

CIE (MOD) ENFORCEMENT MODEL

CONTENTS

Para

1	INTRODUCTION
2	ENFORCEMENT
3	TARGETING
4	ACCOUNTABILITY
5	COMPLAINTS
6	ENFORCEMENT DECISIONS
7	NON CROWN DUTY HOLDERS
8	ENFORCEMENT ACTIONS
9	FORMAL NOTICES
10	REPORT
11	FORMAL NOTICE OF IMPROVEMENT (FNI)
12	FORMAL NOTICE OF PROHIBITION (FNP)
13	APPEAL
14	REINSPECTION
15	BREACH OF FNP
16	DISOBEDIENCE OF THE REGULATIONS
17	CANCELLATION OF FORMAL NOTICE (FN)
18	SUSPENSION OR WITHDRAWAL OF LICENCES
19	HEALTH & SAFETY EXECUTIVE ACTION

1 INTRODUCTION

1.1 The responsibilities of the Secretary of State (SofS) for Defence and the exercise of his duties involving the MOD's explosives activities for the Land and Air environments are detailed in JSP 482 MOD Explosives Regulations.

1.2 CIE (MOD) is the MOD OME Safety Regulator for all MOD conventional explosives activities detailed in JSP 482. He will plan, promulgate and execute inspections of explosives facilities/activities CIE (MOD) is the enforcing authority and empowers his inspectors to carry out Explosive Safety Enforcement duties on behalf of the S of S for Defence, and where breaches of safety or non compliance are observed, take suitable action to enforce the regulations.

1.3 This Enforcement Model sets out the general principles and rules which CIE (MOD) expects his Inspectors to follow. It also provides guidance to MOD Departments and Non-Crown bodies as to the authority of CIE (MOD) Inspectors. All Inspectors who take enforcement decisions are required to follow CIE (MOD)'s Enforcement Model. All Inspectors are authorised in writing, setting out the extent of their authority. They must show their authorisation when requested.

2 ENFORCEMENT

2.1 The purpose of enforcement is to ensure that duty holders comply with JSP 482, manage and control risks effectively, thus preventing harm. This will include:

- (a) Ensuring duty holders take action to deal immediately with serious risks;
- (b) Promote and achieve sustained compliance with the regulations being applied;
- (c) Ensure that duty holders who fail in their duties to apply the regulations being enforced may be held to account.

2.2 The term “Enforcement” has a wide meaning and applies to all dealings between enforcing authorities and those on whom the law and MOD Policy places duties. The term “Enforcement”, as intended in this model, includes the following activities; advisory visits, assisting with compliance, formal inspection and enforcement action for the compliance of JSP 482 and any associated regulations referred to in that document.

3 TARGETING

3.1 CIE (MOD) policy on Inspections and advice will be to expend a greater degree of resource on those establishments whose explosives facilities/activities and/or management give rise to the most serious risks. Where enforcement action is necessary Inspectors will seek to identify the duty holder(s). The primary duty holder may be the HoE in virtually all instances. Subsidiary duty holders may include, Contractor, Contracting Authority, TLBH or other responsible person. Inspectors will seek compliance and may identify those regarded as primarily in non-compliance of the Regulations.

4 ACCOUNTABILITY

4.1 Inspectors are accountable to CIE (MOD) for enforcing the requirements of JSP 482. CIE (MOD) is accountable to the Director DSEA and ultimately 2nd PUS for his actions. Inspectors may be judged, against these standards therefore an effective and easily accessible mechanism for dealing with comments and handling complaints is required.

5 COMPLAINTS

5.1 A complaint may be defined as:

“An expression of dissatisfaction, however made, which alleges a failure by an Inspector to perform in line with stated practices but does not include complaints about observations made by Inspectors where there is an appeals procedure”.

5.2 Where there is cause for complaint with Inspectors, the complaint may be made in writing or by electronic means. Complaints are to be submitted and dealt with through normal MOD channels.

5.3 Complaint or comment relating to JSP 482 is to be addressed to the JSP 482 Technical Author through the Change Proposal process contained within JSP 482.

6 ENFORCEMENT DECISIONS

6.1 Inspectors face many variables when dealing with establishments, including the degree of risk, the attitude and competence of management, the history of the establishment, the seriousness of the non-compliance with the regulations, control and protection arrangements for lodger units and the contractual chain.

6.2 To assist with the decision on what enforcement action is required, and to promote a consistency of application, guidance is given at Fig 1. This should be seen as guidance only. If an Inspector observes an immediate danger there may be insufficient time to follow the decision making process outlined, and an immediate cessation of the activity must be ordered, at a safe point in the process or activity, by the Inspector before he can consider the issues and seek advice.

7 NON CROWN DUTY HOLDERS

7.1 There may be instances where a non-compliance of the regulations will be the responsibility of contracted personnel outside of the HoE's chain of command. Such instances may involve Regional Prime Contract (RPC), Private Finance Initiative (PFI), Public Private Partnership (PPP), Multi Activity Contract (MAC) or other partnering/contracting arrangements. In determining responsibility for non-compliance with the regulations Inspectors must take account of any RPC, PFI, PPP, MAC or other contracts in place to provide Facilities Management or Operation of the explosives facilities.

7.2 If, in identifying the duty holder for a non compliance of the regulations, the Inspector determines that it is a Non-Crown body, the non compliance must be referred through the HoE to the Contractor and Contracting Authority. It may also be referred to the HSE in the event of a breach of statutory duty.

8 ENFORCEMENT ACTIONS

8.1 Inspectors will seek compliance with the Regulations by offering the MoD Duty Holders and their representatives' information and advice. Where action is required to achieve compliance with Regulations, then the Inspector will provide an explanation of why the observed evidence is non compliant and what is required to achieve compliance. Inspectors will normally provide such explanation verbally in the first instance, through discussion with the Duty Holder, and then followed up with a written report within one month from the date of inspection. Regulatory and Legal requirements will be clearly distinguished from best practice or non-statutory advice. Inspectors will deal with this by a Report or where appropriate serve written notice (Formal Notice). Before formal action is taken, unless immediate action is required to reduce the risk to life, Inspectors will provide the HoE with an opportunity to discuss the circumstances of the case and, if possible, resolve the points of dispute. The inspector has a range of options open to him. Action can take the form of recommendations to achieve best practice, imposition of licence limitations, restrictions to type of work permitted, prohibition on the use of equipments, activities or further use of or receipts into an explosives store, stores or processing facility or facilities. The ultimate action may be the withdrawal of the explosives licence if the points of dispute cannot be resolved satisfactorily or there is insufficient evidence of compliance with the regulations.

9 FORMAL NOTICES

9.1 Formal notices may take one or more of three options.

- (a) Report
- (b) Formal Notice of Improvement
- (c) Formal Notice of Prohibition

10 REPORT

10.1 A written report will be issued to all establishments following an inspection or advisory visit. This will provide a permanent record of advice offered, establishment

history of non-compliances and continuity of information for other inspectors required to inspect or visit the establishment. Where a written report makes observations requiring mandatory action in order to achieve compliance with the regulations, this must require action. Where the report refers to actions to achieve best practice these may be recommendations. Inspectors will keep a written summary of observations raised and actions or recommendations made to an establishment.

10.2 In all instances where a written report is served to an establishment confirmation, in writing, that the remedial action required, is to be sent by the HoE to the Inspector, once completed. HoE's are normally required to respond within one month of issue of the written report from the Inspector. This period may be extended to two months with the agreement of the Inspector. Exceptionally longer periods must be approved by the DCIE(MOD).

10.3 Where the HoE fails to respond to observations raised in a report within the agreed timescale Inspectors will take action to remind the HoE of the reported observations and request that confirmation of remedial action is provided.

11 FORMAL NOTICE OF IMPROVEMENT (FNI)

11.1 The FNI will take the form of an official letter to the relevant duty holder. Where the issue of a FNI is the chosen course of action an explanation of why such action is required will be given at the time and confirmed in writing where practicable within one month. It will identify the establishment, the non-compliance of regulation, what is to be improved to achieve compliance with the regulation and the supporting regulatory references. It will also indicate a time frame for improvement and highlight the consequences of failing to achieve compliance. A copy of all FNI issued is to be passed to the relevant Duty Holder, the TLBH and, in the case of Non-Crown bodies, the Contract Authority. Where the enforcement decision relates to activities of a contractor then a copy may be sent to the HSE Explosives Inspectorate.

11.2 If the HoE has failed to comply with all mandatory actions required, unless prior approval has been agreed between the HoE and the Inspector, the explosives licences may be suspended or withdrawn for the facilities affected within three months from issue of the written report.

12 FORMAL NOTICE OF PROHIBITION (FNP)

12.1 A Formal Notice of Prohibition (FNP) is to take the form of an official letter to the HoE or relevant duty holder. It will identify the activities being carried out that are subject to prohibition, the date, location and establishment personnel involved where relevant, and the reason for prohibition quoting the regulations being contravened. The FNP will state how long the prohibition is to be in force for and what is required to cancel it.

12.2 Where a FNP is the chosen course of action an explanation of why such action is required will be given at the time and confirmed in writing where practicable within 5 working days. A copy of all FNP issued is to be passed to the relevant duty holder, the TLBH and, in the case of Non-Crown bodies, the Contract Authority. Where the enforcement decision relates to activities of a contractor then a copy may be sent to the HSE Explosives Inspectorate. In the case of COER or Firearms breaches a copy may also be sent to the relevant Police Firearms and Explosives Licensing Office.

13 **APPEAL**

13.1 Where HoE's are in disagreement with any recommendation(s) issued in the written report or Formal Notice they may appeal against the recommendation(s) or decision. Appeals must be made in writing, within 28 days of issue of the written report or Formal Notice. Any appeal must refer to the observation made, the Regulation in question and give full details demonstrating how the Establishment is either meeting the Regulation or applying a commensurate standard. Appeals are to be made to DCIE (MOD). The DCIE(MOD) is to respond to the Appeal, in writing, within one month of receipt.

13.2 Where DCIE(MOD) upholds an appeal that may require a variation to the Regulations, then the relevant duty holder is to staff it, in writing, to DCIE (MOD) as a request for an Approved Variation in accordance with JSP 482. DCIE (MOD) will respond to the Duty Holder and the TLB/TF concerned. If the Approved Variation is rejected the appeal will not be considered as upheld and the activity or process referred to must cease. Where the Approved Variation is accepted DCIE (MOD) will issue approval through the office of the relevant CESA. Approved Variations will be issued on MOD form 1675.

14 **REINSPECTION**

14.1 Where enforcement actions have been raised against an establishment, the inspector reserves the right to conduct a re-inspection.

15 **BREACH OF FNP**

15.1 Where an establishment is found to be in breach of a FNP the Inspector will refer the matter to DCIE(MOD). DCIE(MOD) will report the matter to the relevant chain of command and copy the report to CIE (MOD). When referring matters to the chain of command attention is to be brought to the reference in JSP 482 that infringements of the regulations may be subject to disciplinary action. If the situation continues unresolved DCIE (MOD) will, through CIE (MOD), refer the matter to the Director DSEA.

15.2 Where an establishment is found to continue storing or processing explosives in a facility after the explosives licence(s) for that facility has been removed, this is both a breach of Statute and a non-compliance with MOD Regulations; the Inspector is to report the HoE to the chain of command. When referring matters to the chain of command attention is to be brought to the reference in JSP 482 that infringements of the regulations may be subject to disciplinary action. DCIE (MOD) is also to be informed and if the situation continues unresolved then DCIE (MOD), through CIE(MOD) will refer the matter to the Director DSEA.

15.3 Where an establishment with a Non-Crown explosives licensee is found to continue storing or processing explosives after the explosives licence(s) has been removed, the Inspector is to report the offence to DCIE (MOD), the TLB/TF and the Contracting Authority. DCIE (MOD) will, through CIE (MOD), refer the matter to the Director DSEA and to the Health and Safety Executive (HSE) Explosives Inspectorate.

16 **DISOBEDIENCE OF THE REGULATIONS**

16.1 Where wilful disobedience of the regulations is evident or suspected by personnel with duties for explosives safety this is to be fully reported to the HoE and DCIE(MOD) by the Inspector. When referring matters to the HoE attention is to be brought to the reference in JSP 482 that infringements of the regulations may be

subject to disciplinary action. Where this involves Non-Crown bodies The Contracting Authority and DCIE (MOD) are to also be informed by the inspector. DCIE(MOD) may, through CIE (MOD), refer the matter to the Director DSEA and to the Health and Safety Executive (HSE).

17 CANCELLATION OF FN

17.1 All Formal Notices shall remain in place until the duty holder provides satisfactory evidence that the non-compliance requiring the issue of the FN has been resolved. Upon satisfactory resolution the issuing authority will provide a letter of cancellation of the FN. The letter of cancellation will include reference to the actions taken by the duty holder to resolve the non-compliance with the regulations.

18 SUSPENSION OR WITHDRAWAL OF LICENCES

18.1 When suspending or withdrawing an explosives licence(s) consideration must be given to the time required to move any explosives currently being stored in the subject facility. Inspectors must not compound the non-compliances by withdrawing an explosives licence(s) before the explosives can be moved. Establishments must not take the current storage of explosives as a reason to delay the suspension or withdrawal of the explosives licence(s), but must take all reasonable actions to secure alternative storage and transport. Where an explosives licence is suspended or withdrawn due to a non-compliance of regulations a FNP is also to be issued prohibiting the storage of explosives in the facility(ies) affected.

19 HEALTH AND SAFETY EXECUTIVE ACTION

19.1 In all instances, the HSE will reserve the right to issue Crown Censure or prosecute Crown or Non Crown individuals or Non Crown bodies.

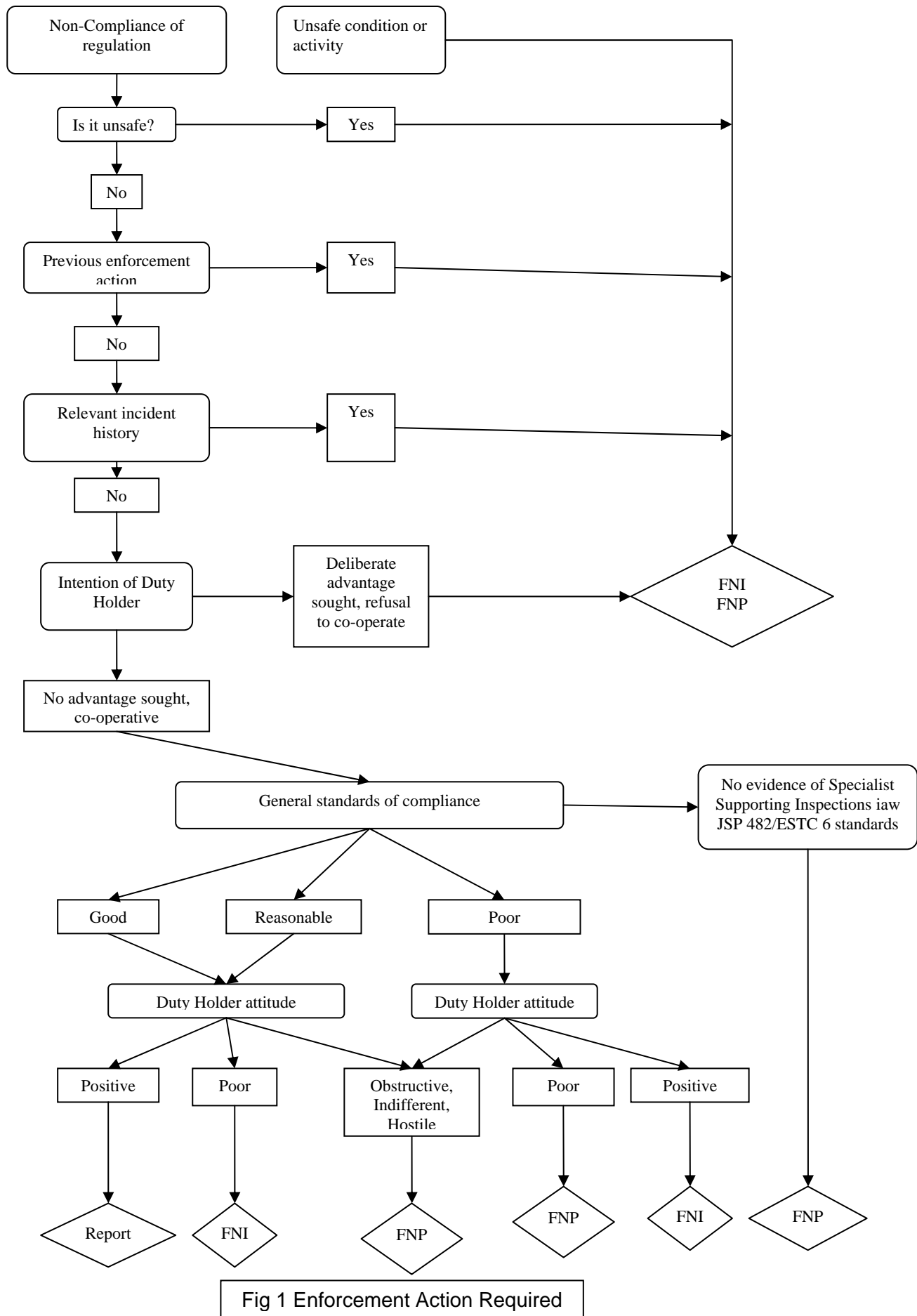


Fig 1 Enforcement Action Required

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