Detonator Marking Requirements
Under U.S. Federal Explosives Regulations
27 CFR, Part 555

Mr. Coordinator,

The United States would like to take this opportunity to discuss our national measures regarding marking requirements for detonators. These regulations are administered by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), which is part of the U.S. Department of Justice.

Our federal regulations require that most commercial explosives contain certain marks of identification for both manufacturers and licensed importers. More specifically, a licensed manufacturer generally must mark their materials with the name of the manufacturer; and the location, date, and shift of manufacture. Similarly, licensed importers generally must mark their materials imported for sale or distribution with the name and address (city and state) of the importer; and the location (city and country) where the explosive materials were manufactured, and the date and shift of manufacture. The marks for imported materials must be placed on the materials within 15 days of release from the custody of our Customs authority.

In addition to the above, our federal regulations also require the following:

- The required marking prescribed in this section must be permanent and legible. It must also be in the English language, using Roman letters and Arabic numerals.
- Licensed manufacturers and licensed importers must place the required marks on each cartridge, bag, or other immediate container of explosive materials that they manufacture or import, as well as on any outside container used for the packaging of such explosive materials.
- Licensed manufacturers and licensed importers may use any method, or combination of methods, to affix the required marks to the immediate container of explosive materials, or outside containers used for the packaging thereof, provided the identifying marks are legible, permanent, show all the required information, and are not rendered unreadable by extended periods of storage.
- If licensed manufacturers or licensed importers desire to use a coding system and omit printed markings on the container that show all the required information specified above, the manufacturer or importer must file with ATF a letterhead application displaying the coding that they plan to use and explaining the manner of its application. ATF must then approve the application before the proposed coding can be used.

Mr. Coordinator, there is an important exception to these marking requirements with respect to detonators. United States regulations require the licensed manufacturer or licensed importer to place the identification marks meeting the above requirements only on the containers used for the packaging of detonators. Therefore, although the cartons and boxes containing detonators must meet the above requirements, each detonator is not required to have these markings. Though not
required, some U.S. manufacturers voluntarily mark each detonator with date/shift codes. This code is placed on the delay tag attached to the lead line or wires.

In addition to our federal regulations, we want to inform delegations that ATF has voiced support for a markings harmonization initiative suggested by the Institute of Makers of Explosives and introduced by the U.S. delegation at the UN in Geneva. Under this plan, the model regulations would contain provisions for uniquely identifying detonators, among other explosive materials. The markings would contain human readable format and a bar or matrix code with information useful for tracing and inventory purposes.

Finally, the United States remains active in international efforts in this area. Both United States customs agencies (U.S. Immigration and Customs Enforcement (ICE) and U.S. Customs and Border Protection (CBP)) participate in operational initiatives, committees and working groups with another international body, the World Customs Organization (WCO). The WCO also recognizes the threat posed by commercial grade explosives, particularly commercial detonators and detonating cord in the creation of IEDs. Based on recommendations from multiple participating customs organizations and input from JIEDDO’s commercial detonator study, the WCO is in the process of adding commercial detonators and detonating cord to the existing list of 14 precursor chemicals currently being monitored and tracked under Program Global Shield, a worldwide C-IED initiative. The fact that this is the first change to the Global Shield List since the start of the program in 2010, underscores the importance of improving the traceability of commercial detonators in countering the IED threat. Additionally, the use of standardized markings and increased traceability will significantly enhance the effectiveness of Program Global Shield by assisting customs and other law enforcement officers in identifying the source of stolen, trafficked, or diverted commercial grade explosives.

Thank you, Mr. Coordinator.