

MSER and Rocketry

(or “a quick tale of how UKRA has worked with the HSE”)

Some time ago, it became increasingly obvious that a variety of problems facing UK rocketry were not going to just disappear by themselves. Looking back on it now, I guess there was an element of “head in sand” and hope it all goes away.

So

Earlier this year, I grabbed the bull by the horns and started to make enquiries. It took the best part of a day on the phone to get to the right people.

Agencies contacted include :-

Fire & Rescue – Lincolnshire and Yorkshire
Lincolnshire Police HQ
Thames Valley Police
HSE Bootle – Enforcement
HSE London – Policy
DTI - Consumer Policy
DTI - Export Control
DTI - Manufacture
Explosives Notified Body – Buxton
Trading Standards – Lincoln and HQ London

At the time, one of the only issues I was concerned with was the CE marking of motors, but the deeper I delved the more issues came to light.

So, below are the issues I raised and the progress so far.

The HSE is currently taking a consolidated look at all the issues raised.

CE Marking

This has proved the most thorny of all the issues.

10 years before last April (04) the powers that be in Europe stated the all products wishing to be placed on the market with Europe must have been tested and given a CE mark as long as they were “within scope” of certain directives. Rocket motors fall squarely within scope of the 93/15/EEC directive (civil use of explosives) and therefore need to be CE marked. There was a 10 year phasing in of these new regulations but that ended April 04. At that point there were no rocket manufacturers with CE marked products even though they had 10 years to implement it.

Many of the reasons for this are down to misinformation and financial burden.

Knowing the above, I approached the HSE explaining the problem our hobby was facing and offering a solution.

I have proposed two solutions to them.

The first was a total exemption for all manufacturers from CE marking due to the existing regulations in place to control their sale, storage and dispersal.

The second was a time limited exemption (3 or 5 years) to allow the manufacturers, who now accept that they must become CE marked, to begin and complete the process within the allotted timeframe.

This second option is the only option I feel that they will entertain but as yet is still by no means certain.

Hybrid Ignition

With the realisation that I was going to have to speak to the HSE about CE marking, I decided it was about time that a number of other smaller issues were put to bed as well.

The issue of cutting propellant grains to use for hybrid ignition is a standard practice stateside but prohibited over here as it is classed as an act of manufacture.

Knowing this I gave the HSE a full and frank account of exactly how, why, by what method, how much is used etc etc etc

I generated a short operating procedure for the cutting of grains to show them we take the safety of such activities with paramount importance. It was also pointed out the positive safety implications of this method over other methods.

Ejection Charges & Pyro Mechs

This is another little problem that has hovered round for a while and was viewed as a grey area. Is the making of an ejection charge for that two stage recovery system an "act of manufacture"?

Well erm

Opinion is still divided on that one.

So, another little operating procedure was generated, looking at size and weight of BP to be used, showing the safety precautions used and the products out there on the market to facilitate ejection charge manufacture (safeject for instance).

By keeping the amounts to a realistic level, I'm pretty confident the HSE will grant an exemption for this part of our hobby.

The procedure also covers pyro release mechanisms, explosive bolts and any other self prepared pyrotechnically actuated device.

At this point, I would like to say thanks to Mark Perman and Phil Charlesworth for their contributions to this element of the paper.

Fee Structure

Another thorny one !

The HSE have agreed to reconsider the implications of the new fees structure as they relate to rocketry.

With that in mind, I have followed on with this issue from where other rocketeers have begun, most notably John Harvey of SERFS.

The HSE are now actively and with haste, looking at the fee structure for our hobby. Unfortunately, I cannot comment on the progress of this part of the paper.

Listed below are the correct fees that we as rocketeers should be paying under the new MSER regulations, which came into force in April 05.

It is worthwhile noting however, that the propagation and correct enforcement of these new regulations is taking quite some time and the fees payable across the country are not the same. Some forces are still operating under the old fee structure.

Explosives Certificate

New application	£165
Renewal	£135

Registration

New Application	One Year	£60
	Two Years	£90
	Three Years	£120
Renewal	One Year	£30
	Two Years	£60
	Three Years	£90

For clearer guidance on the fee structure, registration exemptions, weights and types of explosive and certification information – please read the UKRA document “A Rocketeers Guide to Legal Requirements”.

It is very important for all rocketeers to read the guidance on licencing and paperwork.

It contains much more expansive details of the requirements and un numbers as well as quantities of the various explosive materials used in our hobby.