

Licensed Manufacturers Must:

Maintain Records

Maintain all records of explosive materials importation, manufacture or other receipt, use, and sale, or other disposition, whether temporary or permanent. Records must be retained in permanent form (e.g., commercial invoices, record books, computer records) on the business premises for 5 years from the transaction date or until the discontinuance of business or operations. When going out of business, records must be sent to the ATF Out-of-Business Records Center.

Annual Inventory

Take and record an annual physical inventory of all explosive materials on hand and a special inventory when:

- Commencing business, (the effective date of the explosives license issued);
- Moving the premises location to another region;
- Discontinuing business; and
- At any time ATF may require such in writing.
- Take a physical inventory if a special inventory has not been taken during the calendar year. If the inventory does not match the DSMT, a full inventory and reconciliation of any discrepancies is strongly encouraged.

Explosive Material Acquisition or Manufacture

Enter in a separate record, no later than close of the next business day following the date of manufacture or other acquisition of explosive materials:

- Date of manufacture or other acquisition;
- Manufacturer's marks of identification;
- Quantity (in applicable units);
- Name, brand name or description (dynamite—dyn, blasting agents—ba, display fireworks—df, etc.) and size (length and diameter or diameter only of display fireworks).

Explosive Material Distribution

Enter in a separate record, no later than close of the next business day following the date of distribution to a licensee or a permittee:

- Date of disposition;
- Name or brand name of manufacturer or name of importer, as applicable, if acquired other than by licensee's own manufacture;
- Manufacturer's marks of identification;
- Quantity (in applicable units);
- Description and size;
- License or permit number of person to whom the materials were distributed.
- Maintain separate records of sales or other distribution made to non-licensees or non-permittees (e.g., law enforcement agencies).

Manufacturing For Own Use

Enter in a separate record, no later than close of the next business day following the date of use:

- Date of use;
- Quantity (in applicable units);
- Description and size.
(Not required if manufactured for own use and used within 24 hour period at the same site.)

Exporting Explosive Materials

Maintain records showing the manufacture or acquisition and records showing the quantity, manufacturer's name or brand name of explosive materials, name and address of the foreign consignee of materials, and the exportation date.

This overview is intended as general guidance. The Federal explosives regulations at 27 CFR, Part 555 provide specific regulatory requirements for explosive materials. This overview is intended as an aid to compliance with those regulatory requirements not as a replacement.

U.S. Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives
99 New York Avenue, N.E.
Washington, DC 20226

www.atf.gov



ATF Publication 5400.19
October 2011

U.S. Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives
Office of Enforcement Programs and Services



ATF

Recordkeeping Requirements for Explosive Material Manufacturers



Manufacturer of Explosives Record of Acquisition

Date of Manufacture/ Other Acquisition	Manufacturer Marks of Identification	Quantity	Name, Brand Name or Description and Size

Refer to 27 CFR 555.123(b)

Manufacturer of Explosives Record of Disposition

Date of Disposition	Name, Brand Name of Manufacturer or Importer Name	Manufacturer Marks of Identification	Quantity	Description and Size	License/Permit Number of Distributee

Refer to 27 CFR 555.123(c)