

The following document was written by D17 DIRAUX to summarize new restrictions on commercial pyrotechnics and Auxiliary use. Original policy was promulgated to all DIRAUX offices as an email in July 2006 by LCDR Dunbar, G-PCX.

Commandant Policy on Auxiliary Flare Use and Commercial Pyrotechnics

1) Auxiliarists expending commercial pyrotechnics (pyro) for public demonstration purposes is not authorized. G-LCL (Commandant Legal Office) made a decision based on input from the ordnance staff in RPC that such a practice is not in the "scope of the employment" for Auxiliarists. According to G-RPC (Commandant Ordinance Office) policy, Coast Guard active duty units do not give pyro demonstration since personnel are trained on military pyro. Second they do not want to endorse or give the perception of endorsing any one manufacturer. Third if they train someone who gets hurt the Coast Guard could be held liable for their injuries. If a Flotilla wants to give training, they can teach the public how to properly care and store their pyro and to become familiar with the manufacturer's directions on how to deploy it. That would be the extent of training that Aux should offer. The bottom line is that Auxiliarists cannot expend pyro – any type, current or expired, commercially purchased or govt issue-- for demonstration and / or educational purposes for the general public.

2) There is no restriction whatsoever with using current government-issue pyro or civilian purchased pyro for training purposes within the Auxiliary. However, G-RPC recommends that an active duty member from a Station (who are trained semi-annually) be present to assist.

3) Coast Guard Commandant Office of Ordinance, G-RPC's official policy is they do not want Coast Guard units accepting civilian pyro for disposal from the public. It comes with too many unknowns that could endanger CG personnel especially if it is past what the manufacturer is guaranteeing, which basically what the expiration date is. Military pyrotechnics (flares) are subject to periodic lot testing and has a method of reporting any defects with it. These problems then are reported to the field via Notice of Ammunition Reclassification (NAR) reports. The other issue with civilian pyro is that we do not know all the hazards and storage compatibility with out going to each and every manufacturer.

Any questions regarding this guidance, please contact OTO, BMC Gross.

LCDR Albright

7/24/06

-----Original Message-----

From: KDunbar@comdt.uscg.mil [mailto:KDunbar@comdt.uscg.mil]

Sent: Monday, July 24, 2006 6:07 AM

To: Albright, Susan LCDR

Cc: Welicka, Valerian CDR; Hall, Nelson WEPS2

Subject: NEW FLARE POLICY EXPLAINED

Sue,

I will attempt to answer your questions again about flares. I am summarizing from about 10 emails commencing in January.

1) Since RPC (CWO Nick Hall is copied above) owns that policy, they have decided to include verbiage about it in the ordnance manual currently being updated instead of issuing an ALCOAST. The level of interest in this topic has not risen to that of an ALCOAST. It was determined that it's not appropriate for PCX to issue written policy on a flare training program since we are not the subject matter experts. The bottom line is PCX does not own the flare policy. However, once the Ordnance Manual is promulgated, we'll make sure that language is sent around.

2) According to RPC policy, Coast Guard active duty units do not give pyro demonstration since personnel are trained on military pyro. Second they do not want to endorse or give the perception of endorsing any one manufacturer. Third if they train someone who gets hurt the Coast Guard could be held liable for their injuries. Therefore, Auxiliarists expending commercial pyro for public demonstration purposes is not authorized either. G-LCL made a decision based on input from the ordnance staff in RPC that such a practice is not in the "scope of the employment" for Auxiliarists. If a Flotilla wants to give training, they can teach the public how to properly care and store their pyro and to become familiar with the manufacturer's directions on how to deploy it. That would be the extent of training that Aux should offer. The bottom line is that Auxiliarists cannot expend pyro - any type, current or expired, commercially purchased or govt issue-- for demonstration and / or educational purposes for the general public.

3) There is no restriction whatsoever with using current government-issue pyro or civilian purchased pyro for training purposes within the Auxiliary. However, RPC recommends that an active duty member from a Station (who are trained semi-annually) be present to assist.

4) RPC's official policy is they do not want Coast Guard units accepting civilian pyro for disposal from the public. It comes with too many unknowns that could endanger CG personnel especially if it is past what the manufacturer is guaranteeing, which basically what the expiration date is. Military pyro is subject to periodic lot testing and has a method of reporting any defects with it. These problems then are reported to the field via Notice of Ammunition Reclassification (NAR) reports. The other issue with civilian pyro is that we do not know all the hazards and storage compatibility with out going to each and every manufacturer.

v/r

-Kd