PUBLIC SUBMISSION

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Bureau of Industry and Security: Retrospective Regulatory Review Under E.O. 13563

Comment On: BIS-2011-0027-0001
Retrospective Regulatory Review Under E.O. 13563

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015 Comment by Institute of Makers of Explosives

Submitter Information

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General Comment

IME is the safety and security association for the commercial explosives industry. Our members manufacture explosives that are exported under the EAR. IME supports the regulatory review but cautions against making changes to ECCNs 1C018 and 1C992 without careful consideration. About ten years ago, IME worked with BXA and DTRA to revise the decriptions of these two EAR items. These revisions have proven to work well for all parties involved.