

# **IMPLEMENTATION**

# **GUIDE**

NO.	<b>A1 – Security of ammonium nitrate cargo aboard import vessels</b>	Y/N
A1	The manufacturing and/or distribution facility has undertaken measures to ensure the security of inbound ammonium nitrate cargo aboard import vessels.	

## **SPECIFIC REQUIREMENTS**

The security of import shipments of ammonium nitrate is critical due to the typical size of the shipment and the potential security risks through the receiving process. In order to minimize these risks, the applicable sections of the following acts and regulations must be reviewed to ensure compliance:

### **International Maritime Dangerous Goods Code:**

The International Maritime Organization (IMO) administers the International Maritime Dangerous Goods (IMDG) Code. The IMO adopted the IMDG as a mandatory regulation for all shipments as of January 1, 2004. Shipments of ammonium nitrate must conform to the applicable sections of the code. The major sections of the IMDG are:

#### Volume 1:

- General Provisions, Definitions and Training
- Classification
- Packing and Tank Provisions
- Consignment Procedures
- Construction and testing of packaging, IBC's, large packaging, portable tanks and road tank vehicles.
- Transport Operations

#### Volume 2:

- Limited Quantity Exemptions
- Index of Dangerous Goods Classifications
- Appendices

#### Supplement:

- EMS Guide
- Medical First Aid Guide
- Reporting Procedures
- Packing Cargo Transport Units
- Safe Use of Pesticides
- INF Code

The act and regulations can be obtained at the following link:

<http://www.imo.org/home.asp>

## **Maritime Transportation Security Regulations**

The Marine Transportation Security Act and Regulations is administered by Transport Canada and applies to all shipments from Canadian ports. The major sections of the regulations are:

### Part 1 – General

#### Par 2 - Vessels

- Interpretation
- Company Security Officer
- Security Drills and Exercises
- Vessel Security Assessment
- Vessel Security Plan
- Security Procedures for Access Control
- Security Procedures for Restricted Areas
- Security Procedures for Handling Cargo
- Security Procedures for delivery of Ship's Stores and Bunkers
- Security Procedures for Monitoring
- Additional Requirements in respect of Cruise Ships

### Part 3 – Marine Facilities

- Marine Facility Security Officer
- Security Drills and Exercises
- Marine Facility Security Assessment
- Security Procedures for Access Control
- Security Procedures for Restricted Areas
- Security Procedures for Handling Cargo
- Security Procedures for Delivery of Ships Stores and Bunkers
- Security Procedures for Monitoring
- Occasional-Use Marine Facilities
- Occasional-Use Marine Facilities Security Officer
- Ports
- Port Security Plan
- Restricted Areas
- Restricted Area Passes or Keys

### Part 4 – Repeal and Coming into Force

- Repeal
- Coming Into Force

The act and regulations can be obtained at the following link:

<http://www.tc.gc.ca/acts-regulations/GENERAL/m/mtsa/regulations/001/mtsa002/mtsa002.htm>

### **Coast Guard Regulatory Requirements:**

Regulations governed by The Canada Maritime Act of June 11, 1998.

Canadian Port Authorities under special agreement (MOU - memo of Understanding) with Canadian Coast Guard for shipments of ammonium nitrate:

- On site safety check of all discharge equipment shore and land.
- Manned Fire prevention services to be on site at all times during discharge.
- Port Authority fire inspector to be present during discharge.
- Company representative to be on site during discharge.
- Fire hoses must be on site and ready for use.
- Stowage outside will only be in blocks of 100 pallets. (10X10)
- There must be a 20 foot space between each block.
- No hot working or refueling of vehicles shall take place within 30 M of any Ammonium Nitrate
- No Smoking signs to be placed at entrance to terminal and on board vessel.

### **Transportation of Dangerous Goods Act & Regulations:**

The Transportation of Dangerous Goods Act and Regulations is administered by Transport Canada and applies to all shipments of dangerous goods within Canada. The major sections of the regulations are:

- Part 1 – General Provisions
- Part 2 – Classification
- Part 3 - Documentation
- Part 4 - Dangerous Goods Safety Marks
- Part 5 – Means of Containment
- Part 6 – Training
- Part 7 – Emergency Response Assistance Plan
- Part 8 – Accidental Release and Imminent Accidental Release Reporting Requirements
- Part 9 – Road Transportation
- Part 10 – Rail Transportation

- Part 11 – Marine Transportation
- Part 12- Air Transportation
- Part 13 – Protective Directive
- Part 14 – Permit for Equivalent Level of Safety
- Part 15 – Court Order
- Part 16 – Inspectors

The act and regulations can be obtained at the following link:

[http://www.tc.gc.ca/acts-regulations/general/t/tdg/regulations/tdg001/part\\_1.htm](http://www.tc.gc.ca/acts-regulations/general/t/tdg/regulations/tdg001/part_1.htm)

NO.	STANDARD – <i>Security around individuals or company responsible for providing transportation</i>	Y/N
A2	The manufacturing and/or distribution facility has undertaken measures to ensure the all companies providing transportation services for ammonium nitrate have appropriate security measures and clearances.	

## SPECIFIC REQUIREMENTS

In order to minimize security risks, companies responsible for transporting ammonium nitrate must be properly scrutinized from a security perspective. The following requirements are the basic elements that must be assessed to validate a transportation company:

**Bonding or Pre-approval** – the transportation firm has either been bonded or has been pre-approved. A record must be available from the manufacturer or distributor indicating that the transportation firm has been bonded or pre-approved. The pre-approval process must include a review of past references, licensing and certifications.

**Proof of Insurance Coverage** – the manufacturer or distributor must have written proof of valid insurance coverage for all transportation firms used for transporting ammonium nitrate within the last two years.

**Training** – The manufacturer or distributor must have written confirmation from all transportation firms used for transporting ammonium nitrate within the last two years indicating that employees have been provided the applicable training required for compliance to the Transportation of Dangerous Goods Regulations, the Marine Transportation Security Act and the International Maritime Dangerous Goods Code.

**Security/ERP Plan** – The manufacturer or distributor must have written confirmation from all transportation firms used for transporting ammonium nitrate within the last two years indicating that the transportation firm has developed an emergency response plan, including security related issues.

**Motor Carrier Evaluation** – It is a recommended best practice to utilize the Canadian Chemical Producers Association Motor Carrier Evaluation process for validating all transportation firms. A document describing this process is available from the CCPA ([www.ccpa.ca](http://www.ccpa.ca))

It is a mandatory requirement that records of ammonium shipments be kept for a period of two (2) years from the date of shipment.

NO.	STANDARD – <i>Ammonium Nitrate Delivery</i>	Y/N
A3	The manufacturing and/or distribution facility has undertaken measures to ensure proper documentation and authorization of all incoming deliveries of ammonium nitrate.	

**SPECIFIC REQUIREMENTS**

**Authorization for Unloading a Shipment** – Verbal or written authorization must be provided to the operator of the transport vehicle/vessel prior to a load of ammonium nitrate being unloaded at destination. This is a sound inventory management practice as well as a good security risk management practice. Authorization must include confirmation of the location of the delivery, the shipper and the exact storage area where the ammonium nitrate is to be deposited at the storage facility. It is a recommended best practice to always have a representative of the receiving organization at the storage site to ensure the ammonium nitrate is placed in the proper location.

**Documentation Review Prior to Unload** – All documentation related to a shipment of ammonium nitrate must be reviewed prior to authorizing unload by a representative from the receiving company. The receiver must review the verify that the name of the shipper, the quantity of ammonium nitrate, the name of the receiving company and the date of shipment are all accurate and listed on the shipping documentation prior to authorizing unload.

**Verification of Arrival of Shipment at Destination** – The shipping company must have a process in place to verify that a shipment of ammonium nitrate has arrived at destination within the estimated arrival time. For longer delivery routes (4 hours or greater), it is recommended that check in times be established between the dispatch for the shipping organization and the transport vehicle/vessel.

NO.	STANDARD – <i>Aaccess to Product During Shipment</i>	Y/N
A4	The manufacturing and/or distribution facility has undertaken measures to unauthorized access to ammonium nitrate during shipment.	

**SPECIFIC REQUIRMENTS:**

**Security of Ammonium Nitrate in Transit** – All truck shipments of ammonium nitrate cannot be left unattended by driver at anytime unless the load is parked in a secured area or the unit/load is properly locked down (i.e. padlocks, fifth wheel locks, etc). A secured area refers to an areas surrounded by 2 meter high chain link fence with the three strand barb wire at the top. The area must also have lockable gates that are secured when the site is unattended. If storage is not possible in this type o secured area, the access hatches and gates to the load must be secured and locked. It is a recommended best practice that shipments of ammonium nitrate be non-stop to avoid increased security risks.

**Securing of Hatches on Trucks and Railcars** – All access hatches and gates on trucks and railcars transporting ammonium nitrate must be secured and sealed. The recommended best practice for seals is the cable type seal.

**Inspection of Seals** – Seals installed on the access hatches and gates are to be inspected and validated after each stop and upon arrival at destination. The inspection at destination must be documented and attached to the bill of lading for the shipment. It is a recommended best practice to have a check off sheet for the transport operator in order that they can document an inspection of seals at each stop.

NO.	STANDARD – <i>Loss of Product During Shipment</i>	Y/N
A5	The manufacturing and/or distribution facility has undertaken measures to access, investigate and report shortages in shipments of ammonium nitrate.	

**SPECIFIC REQUIRMENTS:**

The receiving facility has a written procedure that describes the inspection process for shipments of ammonium nitrate. The procedure must contain the following elements:

**Verification of Quantities** – if possible, it is highly recommended that the actual weight of ammonium nitrate be determined against shipped quantities to determine if there area any shortages. If determining an actual weight is not possible, a visual inspection will suffice to look for empty or short compartments in the load. All shortages must be documented if in excess of historical norms.

**Tampering of Seals** – Upon arrival at destination, all tampering of seals noticed during shipment or upon arrival must be documented and reported.

**Note:** The nature of the manufacturing and handling process for ammonium nitrate predicates that there will be a minor loss of product mass through the supply chain due to moisture loss, mechanical abrasion, settling and residues. Some industry members have reported the typical expected loss will range from .0.5% – 1.0% of the total weight of product.

NO.	STANDARD – <i>Product Spills during Transport and Unloading</i>	Y/N
A6	The manufacturing and/or distribution facility has a process for ensuring the proper clean-up, documentation and reporting of spills of ammonium nitrate.	

**SPECIFIC REQUIRMENTS:**

The receiving facility has a written procedure that describes the proper process for containing and cleaning up spills of ammonium nitrate. The procedure must contain:

**Containment** – the procedure must contain instructions on how to effectively contain a spill to limit contamination of the spilled product and segregate it from nearby water sources. One method to achieve this is to erect a simple wood barricade around the spill until it is cleaned up.

**Clean-up** – the procedure must contain instructions to employees involved in the clean-up of the proper personal protective equipment to wear during the clean-up and the proper equipment to use for the safely and effectively cleaning up the spill. The procedure must also designate an area where any contaminated product can be segregated and stored until it is disposed of.

**Disposal** – the procedure must describe the proper method of disposal of contaminated ammonium nitrate. The preferred method is to use the contaminated product as a fertilizer in land farming operation. However, if the contaminant in the ammonium nitrate makes this not agronomically possible, the product will have to be disposed of in accordance with the regulatory requirements.

**Reporting** - Provincial Environmental Regulations typically require that ammonium nitrate spills that produce more that 50 kg’s of contaminated product must be reported to regulatory authorities. It is recommended that specific regulations be consulted to determine individual provincial requirements.

**SECTION B GUIDE FOR MANUFACTURING AND/OR DISTRIBUTION STORAGE**

Security at the ammonia nitrate storage site is critical due to the volume stored and the numerous security risks that may be presented. The following guide provides additional explanation and resources to assist in compliance to the Code of Practice.

NO.	STANDARD – <i>Access to product while in storage</i>	Y/N
B1	The manufacturing and/or distribution facility has undertaken measures to ensure the security of ammonium nitrate storage.	

**SPECIFIC REQUIREMENTS:**

When reviewing the security risks at a storage facility, it is always best to start with an assessment of the security risks at the facility. Once these risks are assessed, it is recommended that a facility develop a multilevel security response plan for the facility. This multilevel plan will feature several “layers” of security that must be breached in order to gain access to the ammonia nitrate storage area. An example of a multilevel plan would be the installation of security lighting that is motion activated as the first level and locks on all doors/bin gates as a second level. Best practices in security have always shown a multilevel approach to be very effective in deterring theft. Remember, that the key issue is to put enough security measures in place that provide notification of potential theft (ie. lighting, alarms, etc.) or barriers to entry (ie. fences, locks, etc) that increases the risk of detection for criminals.

Given enough time and resources, criminals can gain access to most buildings. However, thefts of ammonium nitrate usually occur very opportunistically in short periods of time to avoid detection. Putting measures in place that increase the effort required to access ammonium nitrate will usually deter most criminals.

As a minimum, the following security measures must be employed at all manufacturer and/or distributor locations:

**Securing of Bin Gates** - All bin gates providing access to storage bins containing ammonium nitrate must be locked and secured. It is recommended that the locking device be designed to be resistant to bolt cutters.

**Perimeter Security** – It is a recommended best practice to provide perimeter security. This may include fencing with lockable gates or other means of perimeter security around bins and/or buildings storing ammonium nitrate. The recommended standard for perimeter security is a 2 meter chain link fence complete with lockable gates and 3 strand barbed wire barricade at the top of the fence.

**Access Points on Buildings** - All doors, windows and other points of access to buildings storing bagged or bulk ammonium nitrate are secured with a high quality lock. It is recommended that the locking device be designed to be resistant to bolt cutters.

**Key Control System** – A key control system for all locks is employed at the facility. The key control system must have the following features:

- All duplication of keys that provide access to the ammonium nitrate storage areas is done under the strict consent of the facility manager.
- All duplication of keys is to be done by a certified, licensed locksmith who has received permission from the facility manager.
- All keys must be marked as “Do Not Duplicate” and have been stamped with an identification number.
- Assignment of keys is documented and includes, the date of assignment, the ID number of key being assigned, the name of person to whom the key is assigned, the signature of the manager and the signature of the person receiving the key.
- The facility must also have a process in place to retrieve an assigned key once the person leaves the employ of the facility.

**Security Lighting** - After hours security lighting must be provided to illuminate main points of access to storage buildings or bins. The security lighting must be active dusk to dawn and can be motion activated.

**Signage** - the ammonium nitrate storage facility is equipped with signage indicating no unauthorized access. The signage must be placed in close proximity to the ammonium nitrate storage area to prevent confusion with customers to the facility. *Do not indicate the presence of ammonium nitrate on the sign.*

NO.	STANDARD – <i>Emergency Response Plan</i>	Y/N
B2	The manufacturing and/or distribution facility has a written, up to date emergency response plan.	

**SPECIFIC REQUIRMENTS:**

An emergency response plan is a very effective tool for planning for a response to emergency situations. Unfortunately, security related incidents are often overlooked in the plan. In order to ensure that major risk events are planned for, including security related incidents, the following requirements must be key features of the emergency response plan:

**Written ERP** – Every facility that stores ammonium nitrate must have a written Emergency Response Plan. This plan must address all of the major risk events at the facility including security related incidents. As a minimum requirement, the plan must identify the process to be followed in the event of security breach at the facility. This would include contact numbers for security issues, contact numbers for local law enforcement and reporting procedures.

**Updating of ERP** - The ERP has been reviewed and updated within the previous 12 months. Issues to be reviewed may include:

- Updating of Names on the contact list
- Updating of Contact Numbers on the emergency contact list.
- Updating of changes at the storage facility.
- Communication of updated plan to local law enforcement and emergency responders

**Notification of Storage of Ammonium Nitrate** - A letter has been sent to local law enforcement informing them of the presence of ammonium nitrate at the storage facility. It is a recommended best practice to invite local law enforcement officials to the storage site in order to review the storage location of the ammonium nitrate and gain their input to security measures being employed at the facility.

NO.	STANDARD – <i>Access by onsite personnel</i>	Y/N
B3	The manufacturing and/or distribution facility has a procedures and training in place to ensure proper security clearance and authorization for employees handling ammonium nitrate.	

**SPECIFIC REQUIRMENTS:**

One element of a well planned and executed security plan is a process to ensure that all employees and contractors at the storage facility have been screened to prevent possible security risks. it is critical that this screening process not infringe on an individuals personal rights and freedoms. Therefore, it is good practice to ensure authorization is received from an individual prior to any review of their past references.

The screening process must include:

**Past Work References for Existing Employees:**

All employees working at the ammonium nitrate storage facility provide valid past work references. This is not required the employee has been working at the facility for a period greater than five years.

**Past Work References on New Hires:**

As a condition of employment, a potential new hire must disclose any previous criminal charges and provide valid past work references. As a matter of due diligence, it is critical that all past work references be contacted to verify the work history of the new hire and any potential security related risks.

**Past Work References for Contractors:**

All contractors to provide documentation indicating past work history. This is not required if the contractor has established work history with the facility for a period equal to or greater than five years.

**Written Authorization for Contractors:**

All contractors at the ammonium nitrate storage facility have written authorization from the manager of the facility including the date of authorization, the names of the contractors and a description of the work to be performed.

NO.	STANDARD – <i>Loss of Product During Storage</i>	Y/N
B4	The manufacturing and/or distribution facility has developed and implemented a process to assess, investigate and report shortages in shipments of ammonium nitrate.	

**SPECIFIC REQUIRMENTS:**

It is good inventory management practice, as well as good security risk management, to regularly reconcile inventories of ammonium nitrate. This will quickly identify any loss of product above historical norms in order that the potential cause(s) can be investigated. In addition, it is good practice to make regular visual inspections at the facility to identify potential issues of tampering.

The facility must have a written policy and procedure that contains the following elements:

**Inventory Audit Reconciliation**

The facility must have a written process describing the annual Inventory audit reconciliation for all ammonium nitrate bagged and bulk storage facilities. For bulk storage, the recommended best practice is a weighed audit executed at periods of low inventory levels. Where this is not possible, an estimate of inventory levels will suffice.

**Reconciliation and Reporting**

There must be a reporting process for any shortages in excess of historical norms. The reporting process must indicate the amount of the shortage and an investigation into the potential cause.

**Monthly Inspection**

A documented, monthly inspection must be conducted for all ammonium nitrate storage areas to identify any tampering or loss of product volume. If any tampering and/or product loss is noted, it must be reported immediately to company officials.

## SECTION C GUIDE FOR MANUFACTURING AND/OR DISTRIBUTION OUTBOUND

This section provides more detailed description of compliance requirements for Section C of the Code. This section of the guide will also apply to Inbound Shipments to Retail.

NO.	<b>STANDARD – <i>Security around individuals or company responsible for providing transportation</i></b>	Y/N
C1	The manufacturing and/or distribution facility has undertaken measures to ensure the all companies providing transportation services for ammonium nitrate have implemented appropriate security clearances.	

### **SPECIFIC REQUIREMENTS**

In order to minimize security risks, companies responsible for transporting ammonium nitrate must be properly scrutinized from a security perspective. The following requirements are the basic elements that must be assessed to validate a transportation company:

**Bonding or Pre-approval** – the transportation firm has either been bonded or has been pre-approved. A record must be available from the manufacturer or distributor indicating that the transportation firm has been bonded or pre-approved. The pre-approval process must include a review of past references, licensing and certifications.

**Proof of Insurance Coverage** – the manufacturer or distributor must have written proof of valid insurance coverage for all transportation firms used for transporting ammonium nitrate within the last two years.

**Training** – The manufacturer or distributor must have written confirmation from all transportation firms used for transporting ammonium nitrate within the last two years indicating that employees have been provided the applicable training required for compliance to the Transportation of Dangerous Goods Regulations.

**Photo Identification** – All transport operators will have valid photo identification.

**Security/ERP Plan** – The manufacturer or distributor must have written confirmation from all transportation firms used for transporting ammonium nitrate within the last two years indicating that the transportation firm has developed an emergency response plan, including security related issues.

**Motor Carrier Evaluation** – It is a recommended best practice to utilize the Canadian Chemical Producers Association Motor Carrier Evaluation process for validating all transportation firms. A document describing this process is available from the CCPA ([www.ccpa.ca](http://www.ccpa.ca))

It is a mandatory requirement that records of ammonium shipments be kept for a period of two(2) years from the date of shipment.

NO.	STANDARD – Sale via “Direct to End Use” Shipments	Y/N
C2	The manufacturing and/or distribution facility has undertaken measures to ensure all “Direct to End-Use” shipments have appropriate authorization and documentation.	

**SPECIFIC REQUIRMENTS:**

For larger customers, direct to end use shipments have become an increasingly frequent occurrence. These shipments are higher risk from a security perspective since they are often coordinated by retailers and the manufacturer/distributor has limited knowledge of the customer from a security perspective. In order to ensure ammonium nitrate is being sold to end users with a legitimate agronomic need, the facility must have a policy that contains the following elements for validating an end use customer prior to sale:

**Coordination/Authorization from Retail** – The responsibility for coordinating the sale and delivery of the shipment resides with the retail facility operator. They have a greater knowledge of the local customers and can more easily validate the customer. Prior to issuing an authorization for shipment to the manufacturer/distributor, the retailer must:

- Validated the customer through the provision of proper identification such as:
  - Pesticide License
  - Canadian Wheat Board Number
  - Valid credit application with Company
  - Valid picture identification
  - For Low Density Customers, proper licenses or certificates of authorization must be shown.
- Validate that the size of the order of ammonium nitrate is in accordance with the size of the end user’s needs.
- Ensure that customer is a farmer and is known in the community.
- Report any suspicious purchase attempts to the local police detachment.

**Authorization for Delivery** – Once the customer has been validated by the retail facility operator, a written authorization must be provided to the manufacturer/distributor for the shipment that provides:

- The name of end user
- The quantity of the shipment
- The defined location for the delivery
- The date of the order

- Contact number for the retail location and the end user.

NO.	STANDARD – <i>Traceability of sales records</i>	Y/N
C3	The manufacturing and/or distribution facility has documentation to track sales of ammonium nitrate for the past 24 months.	

**SPECIFIC REQUIRMENTS:**

Tracking of past sales of ammonium nitrate is important in order to provide an audit trail for investigations into criminal misuse of the product. At a minimum, the following information must be contained on each sales receipt:

- Customers Name
- Address or Legal Land Description
- Carrier
- Dates of Delivery
- Quantity of Ammonium Nitrate
- Bagged or Bulk Product

All sales records for ammonium nitrate must be kept for period of two years. The records can be kept in a paper or electronic form.

NO.	STANDARD – <i>Delivery Authorization</i>	Y/N
C4	The manufacturing and/or distribution facility has undertaken measures to ensure proper documentation and authorization of all outbound deliveries of ammonium nitrate.	

**SPECIFIC REQUIRMENTS:**

**Authorization for Unloading a Shipment** – Verbal or written authorization must be provided to the operator of the transport vehicle prior to a load of ammonium nitrate being unloaded at destination. This is a sound inventory management practice as well as a good security risk management practice. Authorization must include confirmation of the location of the delivery, the shipper and the exact storage area where the ammonium nitrate is to be deposited at the storage facility. It is a recommended best practice to always have a representative of the receiving organization at the storage site to ensure the ammonium nitrate is placed in the proper location.

**Documentation Review Prior to Unload** – All documentation related to a shipment of ammonium nitrate must be reviewed prior to authorizing unload by a representative from the receiving company. The receiver must review the verify that the name of the shipper, the quantity of ammonium nitrate, the name of the receiving company and the date of shipment are all accurate and listed on the shipping documentation prior to authorizing unload.

**Verification of Arrival of Shipment at Destination** – The shipping company must have a process in place to verify that a shipment of ammonium nitrate has arrived at destination within the estimated arrival time. For longer delivery routes (4 hours or greater), it is recommended that check in times be established between the dispatch for the shipping organization and the transport vehicle.

NO.	STANDARD – <i>Access to product during shipment</i>	Y/N
C5	The manufacturing and/or distribution facility has undertaken measures to unauthorized access to ammonium nitrate during shipment.	

**SPECIFIC REQUIRMENTS:**

**Security of Ammonium Nitrate in Transit** – All truck shipments of ammonium nitrate cannot be left unattended by driver at anytime unless the load is parked in a secured area or the unit/load is properly locked down (i.e. padlocks, fifth wheel locks, etc). A secured area refers to an areas surrounded by 2 meter high chain link fence with the three strand barb wire at the top. The area must also have lockable gates that are secured when the site is unattended. If storage is not possible in this type of secured area, the access hatches and gates to the load must be secured and locked. It is a recommended best practice that shipments of ammonium nitrate be non-stop to avoid increased security risks.

**Securing of Hatches on Trucks and Railcars** – All access hatches and gates on trucks and railcars transporting ammonium nitrate must be secured and sealed. The recommended best practice for seals is the cable type seal.

**Inspection of Seals** – Seals installed on the access hatches and gates are to be inspected and validated after each stop and upon arrival at destination. The inspection at destination must be documented and attached to the bill of lading for the shipment. It is a recommended best practice to have a check off sheet for the transport operator in order that they can document an inspection of seals at each stop.

NO.	STANDARD – <i>Loss of Product During Shipment</i>	Y/N
C6	The manufacturing and/or distribution facility has undertaken measures to access, investigate and report shortages in shipments of ammonium nitrate.	

**SPECIFIC REQUIRMENTS:**

The receiving facility has a written procedure that describes the inspection process for shipments of ammonium nitrate. The procedure must contain the following elements:

**Verification of Quantities** – if possible, it is highly recommended that the actual weight of ammonium nitrate be determined against shipped quantities to determine if there area any shortages. If determining an actual weight is not possible, a visual inspection will suffice to look for empty or short compartments in the load. All shortages must be documented if in excess of historical norms.

**Tampering of Seals** – Upon arrival at destination, all tampering of seals noticed during shipment or upon arrival must be documented and reported.

**Note:** The nature of the manufacturing and handling process for ammonium nitrate predicates that there will be a minor loss of product mass through the supply chain due to moisture loss, mechanical abrasion, settling and residues. Some industry members have reported the typical expected loss will range from .0.5% – 1.0% of the total weight of product.

NO.	STANDARD – <i>Product Spills during Transport and Unloading</i>	Y/N
C7	The manufacturing and/or distribution facility has a process for ensuring the proper clean-up, documentation and reporting of spills of ammonium nitrate.	

The receiving facility has a written procedure that describes the proper process for containing and cleaning up spills of ammonium nitrate. The procedure must contain:

**Containment** – the procedure must contain instructions on how to effectively contain a spill to limit contamination of the spilled product and segregate it from nearby water sources. One method to achieve this is to erect a simple wood barricade around the spill until it is cleaned up.

**Clean-up** – the procedure must contain instructions to employees involved in the clean-up of the proper personal protective equipment to wear during the clean-up and the proper equipment to use for the safely and effectively cleaning up the spill. The procedure must also designate an area where any contaminated product can be segregated and stored until it is disposed of.

**Disposal** – the procedure must describe the proper method of disposal of contaminated ammonium nitrate. The preferred method is to use the contaminated product as a fertilizer in land farming operation. However, if the contaminant in the ammonium nitrate makes this not agronomically possible, the product will have to be disposed of in accordance with the regulatory requirements.

**Reporting** - Provincial Environmental Regulations typically require that ammonium nitrate spills that produce more than 50 kg's of contaminated product must be reported to regulatory authorities. It is recommended that specific regulations be consulted to determine individual provincial requirements.

## SECTION D GUIDE FOR RETAIL STORAGE

Security at the retail ammonia nitrate storage site is critical due to the volume stored and the numerous security risks that may be presented. The following guide provides additional explanation and resources to assist in compliance to the Code of Practice.

NO.	<b>STANDARD – Access to product while in storage</b>	Y/N
D1	The retail storage facility has undertaken measures to ensure the security of ammonium nitrate storage.	

### **SPECIFIC REQUIREMENTS:**

When reviewing the security risks at a storage facility, it is always best to start with an assessment of the security risks at the facility. Once these risks are assessed, it is recommended that a facility develop a multilevel security response plan for the facility. This multilevel plan will feature several “layers” of security that must be breached in order to gain access to the ammonia nitrate storage area. An example of a multilevel plan would be the installation of security lighting that is motion activated as the first level and locks on all doors/bin gates as a second level. Best practices in security have always shown a multilevel approach to be very effective in deterring theft. Remember, that the key issue is to put enough security measures in place that provide notification of potential theft (ie. lighting, alarms, etc.) or barriers to entry (ie. fences, locks, etc) that increases the risk of detection for criminals.

Given enough time and resources, criminals can gain access to most storage areas. However, thefts of ammonium nitrate usually occur very opportunistically in short periods of time to avoid detection. Putting measures in place that increase the effort and time required to access ammonium nitrate will usually deter most criminals.

As a minimum, the following security measures must be employed at all manufacturer and/or distributor locations:

**Securing of Bin Gates** - All bin gates providing access to storage bins containing ammonium nitrate must be locked and secured. It is recommended that the locking device be designed to be resistant to bolt cutters.

**Perimeter Security** – It is a recommended best practice to provide perimeter security. This may include fencing with lockable gates or other means of perimeter security around bins and/or buildings storing ammonium nitrate. The recommended standard for perimeter security is a 2 meter chain link fence complete with lockable gates and 3 strand barb wire barricade at the top of the fence.

**Access Points on Buildings** - All doors, windows and other points of access to buildings storing bagged or bulk ammonium nitrate are secured with a high quality lock. It is recommended that the locking device be designed to be resistant to bolt cutters.

**Key Control System** – A key control system for all locks is employed at the facility. The key control system must have the following features:

- All duplication of keys that provide access to the ammonium nitrate storage areas is done under the strict consent of the facility manager.
- All duplication of keys is to be done by a certified, licensed locksmith who has received permission from the facility manager.
- All keys must be marked as “Do Not Duplicate” and have been stamped with an identification number.
- Assignment of keys is documented and includes, the date of assignment, the ID number of key being assigned, the name of person to whom the key is assigned, the signature of the manager and the signature of the person receiving the key.
- The facility must also have a process in place to retrieve an assigned key once the person leaves the employ of the facility.

**Security Lighting** - After hours security lighting must be provided to illuminate main points of access to storage buildings or bins. The security lighting must be active dusk to dawn and can be motion activated.

**Signage** - the ammonium nitrate storage facility is equipped with signage indicating no unauthorized access. The signage must be placed in close proximity to the ammonium nitrate storage area to prevent confusion with customers to the facility. *Do not indicate the presence of ammonium nitrate on the sign.*

NO.	STANDARD – <i>Emergency Response Plan</i>	Y/N
D2	The retail storage facility has a written, up to date emergency response plan.	

**SPECIFIC REQUIRMENTS:**

An emergency response plan is a very effective tool for planning for a response to emergency situations. Unfortunately, security related incidents are often overlooked in the plan. In order to ensure that major risk events are planned for, including security related incidents, the following requirements must be key features of the emergency response plan:

**Written ERP** – Every facility that stores ammonium nitrate must have a written Emergency Response Plan. This plan must address all of the major risk events at the facility including security related incidents. As a minimum requirement, the plan must identify the process to be followed in the event of security breach at the facility. This would include contact numbers for security issues, contact numbers for local law enforcement and reporting procedures.

**Updating of ERP** - The ERP has been reviewed and updated within the previous 12 months. Issues to be reviewed may include:

- Updating of Names on the contact list
- Updating of Contact Numbers on the emergency contact list.
- Updating of changes at the storage facility.
- Communication of updated plan to local law enforcement and emergency responders

**Notification of Storage of Ammonium Nitrate** - A letter has been sent to local law enforcement informing them of the presence of ammonium nitrate at the storage facility. It is a recommended best practice to invite local law enforcement officials to the storage site in order to review the storage location of the ammonium nitrate and gain their input to security measures being employed at the facility.

NO.	STANDARD – <i>Access by onsite personnel</i>	Y/N
D3	The retail storage facility has a procedures and training in place to ensure proper security clearance and authorization for employees handling ammonium nitrate.	

**SPECIFIC REQUIRMENTS:**

One element of a well planned and executed security plan is a process to ensure that all employees and contractors at the storage facility have been screened to prevent possible security risks. it is critical that this screening process not infringe on an individuals personal rights and freedoms. Therefore, it is good practice to ensure authorization is received from an individual prior to any review of their past references.

The screening process must include:

**Past Work References for Existing Employees:**

All employees working at the ammonium nitrate storage facility provide valid past work references. This is not required the employee has been working at the facility for a period greater than five years.

**Past Work References on New Hires:**

As a condition of employment, a potential new hire must disclose any previous criminal charges and provide valid past work references. As a matter of due diligence, it is critical that all past work references be contacted to verify the work history of the new hire and any potential security related risks.

**Past Work References for Contractors:**

All contractors to provide documentation indicating past work history. This is not required if the contractor has established work history with the facility for a period equal to or greater than five years.

**Written Authorization for Contractors:**

All contractors at the ammonium nitrate storage facility have written authorization from the manager of the facility including the date of authorization, the names of the contractors and a description of the work to be performed.

NO.	STANDARD – <i>Loss of Product During Storage</i>	Y/N
D4	The retail storage facility has developed and implemented a process to assess, investigate and report shortages in shipments of ammonium nitrate.	

**SPECIFIC REQUIRMENTS:**

It is good inventory management practice, as well as good security risk management, to regularly reconcile inventories of ammonium nitrate. This will quickly identify any loss of product above historical norms in order that the potential cause(s) can be investigated. In addition, it is good practice to make regular visual inspections at the facility to identify potential issues of tampering.

The facility must have a written policy and procedure that contains the following elements:

**Inventory Audit Reconciliation**

The facility must have a written process describing the annual Inventory audit reconciliation for all ammonium nitrate bagged and bulk storage facilities. For bulk storage, the recommended best practice is a weighed audit executed at periods of low inventory levels. Where this is not possible, an estimate of inventory levels will suffice.

**Reconciliation and Reporting**

There must be a reporting process for any shortages in excess of historical norms. The reporting process must indicate the amount of the shortage and an investigation into the potential cause.

**Monthly Inspection**

A documented, monthly inspection must be conducted for all ammonium nitrate storage areas to identify any tampering or loss of product volume. If any tampering and/or product loss is noted, it must be reported immediately to company officials.

**SECTION E GUIDE FOR RETAIL OUTBOUND – COMMERCIAL CARRIER**

This section provides more detailed description of compliance requirements for Section E of the Code.

NO.	STANDARD – <i>Validation of Customers</i>	Y/N
E1	The retail storage facility has undertaken measures to ensure all ammonium nitrate customers have been validated.	

**SPECIFIC REQUIRMENTS:**

**Authorization from Retail** – The responsibility for coordinating the sale and delivery of the shipment resides with the retail facility operator. They have a greater knowledge of the local customers and can more easily validate the customer. Prior to issuing an authorization for shipment, the retailer must:

- Validated the customer through the provision of proper identification such as:
  - Pesticide License
  - Canadian Wheat Board Number
  - Valid credit application with Company
  - Valid picture identification
  - For Low Density Customers, proper licenses or certificates of authorization must be shown.
- Validate that the size of the order of ammonium nitrate is in accordance with the size of the end user’s needs.
- Ensure that customer is a farmer and is known in the community.
- Report any suspicious purchase attempts to the local police detachment.

**Authorization for Delivery** – Once the customer has been validated by the retail facility operator, a written invoice must be provided for the shipment that provides:

- The name of end user
- The quantity of the shipment
- The defined location for the delivery
- The date of the order
- Contact number for the customer.
- 

NO.	STANDARD – <i>Traceability of sales records</i>	Y/N
E2	The retail facility has documentation to track sales of ammonium nitrate for the past 24 months.	

**SPECIFIC REQUIRMENTS:**

Tracking of past sales of ammonium nitrate is important in order to provide an audit trail for investigations into criminal misuse of the product. At a minimum, the following information must be contained on each sales receipt:

- Customers Name
- Address or Legal Land Description
- Carrier
- Dates of Delivery
- Quantity of Ammonium Nitrate
- Bagged or Bulk Product

All sales records for ammonium nitrate must be kept for period of two years. The records can be kept in a paper or electronic form.

	<b>STANDARD – Security around individuals or company responsible for providing transportation</b>	<b>Y/N</b>
E3	The retail facility has undertaken measures to ensure the all companies providing transportation services for ammonium nitrate have implemented appropriate security clearances.	

## **SPECIFIC REQUIREMENTS**

In order to minimize security risks, companies responsible for transporting ammonium nitrate must be properly scrutinized from a security perspective. The following requirements are the basic elements that must be assessed to validate a transportation company:

**Bonding or Pre-approval** – the transportation firm has either been bonded or has been pre-approved. A record must be available from the retailer indicating that the transportation firm has been bonded or pre-approved. The pre-approval process must include a review of past references, licensing and certifications.

**Proof of Insurance Coverage** – the retailer must have written proof of valid insurance coverage for all transportation firms used for transporting ammonium nitrate within the last two years.

**Training** – The retailer must have written confirmation from all transportation firms used for transporting ammonium nitrate within the last two years indicating that employees have been provided the applicable training required for compliance to the Transportation of Dangerous Goods Regulations.

**Photo Identification** – All transport operators will have valid photo identification.

**Security/ERP Plan** – The retailer must have written confirmation from all transportation firms used for transporting ammonium nitrate within the last two years indicating that the transportation firm has developed an emergency response plan, including security related issues.

**Motor Carrier Evaluation** – It is a recommended best practice to utilize the Canadian Chemical Producers Association Motor Carrier Evaluation process for validating all transportation firms. A document describing this process is available from the CCPA ([www.ccpa.ca](http://www.ccpa.ca))

It is a mandatory requirement that records of ammonium shipments be kept for a period of two(2) years from the date of shipment.

NO.	STANDARD – <i>Delivery Receipt Acknowledgement</i>	Y/N
E4	The retail storage facility has implemented measures to ensure proper receipt acknowledgement by the end user upon arrival of the shipment at destination.	

**SPECIFIC REQUIRMENTS:**

An receipt acknowledgment must be receive from the end user for all shipments of ammonium nitrate once it is unloaded. The signature of the end use (or their representative) will indicate that they acknowledge:

- they name of the shipper,
- the quantity of ammonium nitrate,
- the name of the receiving end user, and
- the date of shipment.

NO.	STANDARD – <i>Access to product during shipment</i>	Y/N
E5	The retail facility has undertaken measures to unauthorized access to ammonium nitrate during shipment.	

**SPECIFIC REQUIRMENTS:**

**Security of Ammonium Nitrate in Transit** – All truck shipments of ammonium nitrate cannot be left unattended by driver at anytime unless the load is parked in a secured area or the unit/load is properly locked down (i.e. padlocks, fifth wheel locks, etc). A secured area refers to an areas surrounded by 2 meter high chain link fence with the three strand barb wire at the top. The area must also have lockable gates that are secured when the site is unattended. If storage is not possible in this type of secured area, the access hatches and gates to the load must be secured and locked. It is a recommended best practice that shipments of ammonium nitrate be non-stop to avoid increased security risks.

**Securing of Hatches on Trucks and Railcars** – All access hatches and gates on trucks and railcars transporting ammonium nitrate must be secured and sealed. The recommended best practice for seals is the cable type seal.

**Inspection of Seals** – Seals installed on the access hatches and gates are to be inspected and validated after each stop and upon arrival at destination. The inspection at destination must be documented and attached to the bill of lading for the shipment. It is a recommended best practice to have a check off sheet for the transport operator in order that they can document an inspection of seals at each stop.

NO.	STANDARD – <i>Loss of Product During Shipment</i>	Y/N
E6	The retail facility has undertaken measures to assess, investigate and report shortages in shipments of ammonium nitrate.	

**SPECIFIC REQUIREMENTS:**

The retail facility has a written procedure that describes the process for inspecting shipments of ammonium nitrate upon their arrival at their destination. The procedure must contain the following elements:

**Verification of Quantities** – if possible, it is highly recommended that the actual weight of ammonium nitrate be determined against shipped quantities to determine if there are any shortages. If determining an actual weight is not possible, a visual inspection will suffice to look for empty or short compartments in the load. All shortages must be documented if in excess of historical norms.

**Tampering of Seals** – Upon arrival at destination, all tampering of seals noticed during shipment or upon arrival must be documented and reported.

**Note:** The nature of the manufacturing and handling process for ammonium nitrate predicates that there will be a minor loss of product mass through the supply chain due to moisture loss, mechanical abrasion, settling and residues. Some industry members have reported the typical expected loss will range from .0.5% – 1.0% of the total weight of product.

NO.	STANDARD – <i>Product Spills during Transport and Unloading</i>	Y/N
E7	The retail facility has a process for ensuring the proper clean-up, documentation and reporting of spills of ammonium nitrate.	

The retail facility has a written procedure that describes the proper process for containing and cleaning up spills of ammonium nitrate. The procedure must contain:

**Containment** – the procedure must contain instructions on how to effectively contain a spill to limit contamination of the spilled product and segregate it from nearby water sources. One method to achieve this is to erect a simple wood barricade around the spill until it is cleaned up.

**Clean-up** – the procedure must contain instructions to employees involved in the clean-up of the proper personal protective equipment to wear during the clean-up and the proper equipment to use for the safely and effectively cleaning up the spill. The procedure must also designate an area where any contaminated product can be segregated and stored until it is disposed of.

**Disposal** – the procedure must describe the proper method of disposal of contaminated ammonium nitrate. The preferred method is to use the contaminated product as a fertilizer in land farming operation. However, if the contaminant in the ammonium nitrate makes this not agronomically possible, the product will have to be disposed of in accordance with the regulatory requirements.

**Reporting** - Provincial Environmental Regulations typically require that ammonium nitrate spills that produce more than 50 kg's of contaminated product must be reported to regulatory authorities. It is recommended that specific regulations be consulted to determine individual provincial requirements.

## **SECTION F GUIDE FOR RETAIL OUTBOUND – CUSTOMER PICK-UP**

This section provides more detailed description of compliance requirements for Section f of the Code.

NO.	<b>STANDARD – <i>Validation of Customers</i></b>	Y/N
F1	The retail storage facility has undertaken measures to ensure all ammonium nitrate customers have been validated.	

### **SPECIFIC REQUIRMENTS:**

**Authorization from Retail** – The responsibility for coordinating the sale and delivery of the shipment resides with the retail facility operator. They have a greater knowledge of the local customers and can more easily validate the customer. Prior to issuing an authorization for shipment, the retailer must:

- Validated the customer through the provision of proper identification such as:
  - Pesticide License
  - Canadian Wheat Board Number
  - Valid credit application with Company
  - Valid picture identification
  - For Low Density Customers, proper licenses or certificates of authorization must be shown.
- Validate that the size of the order of ammonium nitrate is in accordance with the size of the end user’s needs.
- Ensure that customer is a farmer and is known in the community.
- Report any suspicious purchase attempts to the local police detachment.

NO.	<b>STANDARD – Sale of Ammonium Nitrate to Non Essential End-users</b>	Y/N
F2	The retail storage facility has written policy and procedures to	

	prohibit sales of ammonium nitrate to customers who do not have an essential requirement for the agronomic or industrial benefits of ammonium nitrate.	
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**SPECIFIC REQUIREMENTS:**

Sales of ammonium nitrate to customers who do not have a direct agronomic or industrial need for the product must be curtailed.

The retail facility must have a policy that would instructs employees to:

- Restrict all sales of high density ammonium nitrate to agricultural and commercial horticultural use only.
- Restrict all sales of low density ammonium nitrate to the explosives market.

NO.	STANDARD – <i>Traceability of sales records</i>	Y/N
F3	The retail facility has documentation to track sales of ammonium nitrate for the past 24 months.	

**SPECIFIC REQUIRMENTS:**

Tracking of past sales of ammonium nitrate is important in order to provide an audit trail for investigations into criminal misuse of the product. At a minimum, the following information must be contained on each sales receipt:

- Customers Name
- Address or Legal Land Description
- Carrier
- Dates of Delivery
- Quantity of Ammonium Nitrate
- Bagged or Bulk Product

All sales records for ammonium nitrate must be kept for period of two years. The records can be kept in a paper or electronic form.

NO.	STANDARD – <i>Delivery Receipt Acknowledgement</i>	Y/N
F4	The retail storage facility has implemented measures to ensure proper receipt acknowledgement by the end user upon arrival of the shipment at destination.	

**SPECIFIC REQUIRMENTS:**

An receipt acknowledgment must be receipt must be received from the end user once the ammonium nitrate loaded on the end users vehicle. The signature of the end use (or their representative) will indicate that they acknowledge:

- they name of the shipper,
- the quantity of ammonium nitrate,
- the name of the receiving end user, and
- the date of shipment.
- their responsibility for the shipment

NO.	STANDARD – <i>Access to product during shipment</i>	Y/N
F5	The retail facility has undertaken measures to unauthorized access to ammonium nitrate during shipment.	

**SPECIFIC REQUIRMENTS:**

**Security of Ammonium Nitrate in Transit** – All truck shipments of ammonium nitrate cannot be left unattended by driver at anytime unless the load is parked in a secured area or the unit/load is properly locked down (i.e. padlocks, fifth wheel locks, etc). A secured area refers to an areas surrounded by 2 meter high chain link fence with the three strand barb wire at the top. The area must also have lockable gates that are secured when the site is unattended. If storage is not possible in this type of secured area, the access hatches and gates to the load must be secured and locked. It is a recommended best practice that shipments of ammonium nitrate be non-stop to avoid increased security risks.

**Securing of Hatches on Trucks and Railcars** – All access hatches and gates on trucks and railcars transporting ammonium nitrate must be secured and sealed. The recommended best practice for seals is the cable type seal.

**Inspection of Seals** – Seals installed on the access hatches and gates are to be inspected and validated after each stop and upon arrival at destination. The inspection at destination must be documented and attached to the bill of lading for the shipment. It is a recommended best practice to have a check off sheet for the transport operator in order that they can document an inspection of seals at each stop.

NO.	STANDARD – <i>Loss of Product During Shipment</i>	Y/N
F6	The retail facility has undertaken measures to assess, investigate and report shortages in shipments of ammonium nitrate.	

**SPECIFIC REQUIREMENTS:**

The retail facility has a written procedure that describes the process for inspecting shipments of ammonium nitrate upon their arrival at their destination. The procedure must contain the following elements:

**Verification of Quantities** – if possible, it is highly recommended that the actual weight of ammonium nitrate be determined against shipped quantities to determine if there are any shortages. If determining an actual weight is not possible, a visual inspection will suffice to look for empty or short compartments in the load. All shortages must be documented if in excess of historical norms.

**Tampering of Seals** – Upon arrival at destination, all tampering of seals noticed during shipment or upon arrival must be documented and reported.

**Note:** The nature of the manufacturing and handling process for ammonium nitrate predicates that there will be a minor loss of product mass through the supply chain due to moisture loss, mechanical abrasion, settling and residues. Some industry members have reported the typical expected loss will range from .0.5% – 1.0% of the total weight of product.

NO.	STANDARD – <i>Product Spills during Transport and Unloading</i>	Y/N
F7	The retail facility has a process for ensuring the proper clean-up, documentation and reporting of spills of ammonium nitrate.	

The retail facility has a written procedure that describes the proper process for containing and cleaning up spills of ammonium nitrate. The procedure must contain:

**Containment** – the procedure must contain instructions on how to effectively contain a spill to limit contamination of the spilled product and segregate it from nearby water sources. One method to achieve this is to erect a simple wood barricade around the spill until it is cleaned up.

**Clean-up** – the procedure must contain instructions to employees involved in the clean-up of the proper personal protective equipment to wear during the clean-up and the proper equipment to use for the safely and effectively cleaning up the spill. The procedure must also designate an area where any contaminated product can be segregated and stored until it is disposed of.

**Disposal** – the procedure must describe the proper method of disposal of contaminated ammonium nitrate. The preferred method is to use the contaminated product as a fertilizer in land farming operation. However, if the contaminant in the ammonium nitrate makes this not agronomically possible, the product will have to be disposed of in accordance with the regulatory requirements.

**Reporting** - Provincial Environmental Regulations typically require that ammonium nitrate spills that produce more than 50 kg's of contaminated product must be reported to regulatory authorities. It is recommended that specific regulations be consulted to determine individual provincial requirements.

## SECTION G GUIDE FOR END USE STORAGE

An end use site (ie. farmer, commercial horticulture or industrial user) is one of the most vulnerable points in the ammonium nitrate delivery chain due to the remote nature of many locations and the limited security presence at the facility. As a result, these facilities are often the focus of criminal activities. Therefore, it is critical that actions be taken to minimize the risks of theft.

NO.	<b>STANDARD – <i>Unauthorized access to product while in storage</i></b>	Y/N
G1	The retail storage facility has provided guidance and recommendation to the end use customer for enhancing the security of ammonium nitrate storage at their facility	

### **SPECIFIC REQUIREMENTS:**

The retail facility must provide written recommendation to all end use customers on the proper steps to take to improve the security of their end use storage facility. This must include the following recommended minimum requirements:

**Risk Assessment** – It is recommended that a security risk assessment be conducted of all end use storage facilities.

**Securing of Bin Gates** – It is recommended that all bin gates providing access to storage bins containing ammonium nitrate be locked and secured. It is recommended that the locking device be designed to be resistant to bolt cutters.

**Perimeter Security** – It is a recommended best practice to provide perimeter security. This may include fencing with lockable gates or other means of perimeter security around bins and/or buildings storing ammonium nitrate. The recommended standard for perimeter security is a 2 meter chain link fence complete with lockable gates and 3 stand barb wire barricade at the top of the fence.

**Access Points on Buildings** – It is recommended that all doors, windows and other points of access to buildings storing bagged or bulk ammonium nitrate are secured with a high quality lock. It is recommended that the locking device be designed to be resistant to bolt cutters.

**Security System** – It is a recommended best practice to equip all buildings storing ammonium nitrate with a monitored security system.

**Security Lighting** – It is recommended that after hours security lighting be provided to illuminate main points of access to storage buildings or bins. The security lighting must be active dusk to dawn and can be motion activated.

NO.	STANDARD – <i>Usage Documentation and Record Keeping</i>	Y/N
G2	The retail storage facility has provided instructions to all customers of ammonium nitrate to maintain consumption and post season storage information for a period of two years.	

**SPECIFIC REQUIRMENTS:**

As part of their guidance to end use customers, retail locations will provide guidance to all ammonium nitrate customers on the proper procedures they must follow for keeping records of ammonium nitrate usage at their operation. The guidance will include:

- End use customers must keep records of all ammonium nitrate purchases, in season usage and post season storage for two years.
- End use customers have also been advised that re-selling of ammonium nitrate is illegal.