



Guideline for Key Control Plan

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In order to minimize unauthorized entry, access to a magazine must be limited by key control through procedures and restricted keyways. A restricted keyway means there are controls on its duplication and availability, and procedures are addressed in a Key Control Plan. A Key Control Plan is required for all explosives magazines, not just for high explosives. The plan must show how security will be maintained and how access to explosives and raw material will be controlled. Unlike the Security Plan or Fire Control Plan, the Key Control Plan must be in place, but it does not need to accompany the licence application or renewal.

1. REQUIREMENTS

Section 153(1) under Part 6 of the *Explosives Regulations, 2013* provides the requirements of the Key Control Plan. A Key Control Plan must include the following:

- 1.1 every key to the magazine must be numbered;
- 1.2 a person may only have possession of a key to the magazine if they are named in the plan;
- 1.3 the number of people named in the plan must not exceed the number necessary for the operation of the magazine;
- 1.4 the lock on the magazine must be of a type for which keys can be obtained only from the lock's manufacturer or a certified locksmith designated by the manufacturer; and
- 1.5 each key must be kept in a locked and secure location when it is not in the possession of a person named in the plan.

The plan must be updated to reflect any change in circumstances that could adversely affect the security of the magazine and, if a key is lost or stolen, the lock must be immediately replaced.

2. CONTENTS OF A KEY CONTROL PLAN

Part II, Section 5.0, Key Control, in the *Storage Standards for Industrial Explosives, May 2001*, provides some details on what should be included in a Key Control Plan while Appendix B in Part I provides a list of acceptable locks meeting the requirements for the key itself. There is no specific format for the plan; however, all the listed requirements must be addressed.

2.1 Keys

Every key must have a number that is used to issue keys from a locked and secure location to an individual listed in the plan. The number must not be the serial number issued by the manufacturer as this must be removed as part of the security measures. The key can only be obtained from the manufacturer or copied by a certified locksmith designated by the manufacturer.

2.2 Locked and Secure Location

All keys must be kept in a locked and secure location when not being used. While a key may be issued for the work day due to access requirements, it must be returned to the secure location prior to leaving for the day. In cases where access is infrequent, obtaining and returning the key each time access is required is appropriate. Access to the keys must be limited to those permitted to possess them by card or code access or by another means of ensuring the key cannot be accessed by someone not permitted. How access is controlled needs to be included in the plan.

2.3 Persons Named in the Plan

The plan must include the names of those persons permitted to have access to the keys and thus the explosives. The number of persons named in the plan must not exceed the number reasonably required to efficiently operate the magazine(s). In the case of types E, I, and D explosives, the person named in the plan must be security screened and have an approval letter or equivalent document.

2.4 Lost, Stolen, or Misplaced Keys

If a key is lost or stolen, the lock must be replaced immediately. A key that has been misplaced and is later found should also require the lock to be replaced. The plan must detail the process to follow when replacing a lock due to lost, stolen, or misplaced keys.

3. ADDITIONAL CONSIDERATIONS

Section 2. provides details on what the Key Control Plan must include. Additional things to consider are:

- 3.1 assigning someone to review the plan on a regular basis to ensure it is up to date; and
- 3.2 providing training to ensure everyone is familiar with the plan and its procedures.

If you have any questions, the Explosives Regulatory Division can be reached at the coordinates below.

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