



# Ammonium Nitrate Security Plan Guideline

Explosives Safety and Security Branch  
Explosives Regulatory Division

Document no. G20-01

October 2020

## Table of Contents

<b>1. Introduction</b>	3
<b>2. Contents of a Security Plan</b>	3
2.1 Seller Information	3
2.2 Emergency Procedures to Address Security Risks	3
2.2.1 Controlling Access to AN	4
2.2.2 Managing Stocks of AN	4
2.2.3 Reporting Incidents	4
2.2.4 Refusing a Sale	5
<b>3. Additional Regulatory Requirements</b>	5
<b>4. Other Considerations</b>	6
4.1 Confidentiality of the Security Plan	6
4.2 Update of the Security Plan	6
4.3 Employee Training	6
<b>APPENDIX</b>	7

## 1. Introduction

This guideline is intended to help sellers of Ammonium Nitrate (AN) develop a Security Plan for their site. As part of the application to enroll as a seller of AN, a declaration must be made that a Security Plan has been implemented for each location where AN will be sold or stored.

The purpose of a Security Plan is to enhance and maintain the security of an AN seller's operation. This is achieved by assessing a site for security risks, developing measures to address security issues and incorporating current security programs into the plan. This plan should formalize responses to security incidents. The plan will also assign people (or positions) within a company to implement specific portions of the plan.

The section numbers used in this document refer to the relevant sections under the [Explosives Regulations, 2013 \(ER, 2013\)](#).

## 2. Contents of a Security Plan

There is no specific format for the Security Plan; however, the listed requirements below must be included. An example of a Security Plan is provided in Appendix.

### *2.1 Seller Information*

A Security Plan must be submitted for each location where a seller stores or sells AN. The Security Plan is site specific and the Seller Information section identifies the company, the specific site, and a person responsible for the Security Plan at that site. The information that should be contained in the Seller Information section is identified below:

- Company identification;
- Site identification; and,
- The person responsible for the Security Plan at the site.

### *2.2 Emergency Procedures to Address Security Risks*

This section of the Security Plan provides or references the emergency procedures to be followed in responding to the risks identified, and should include assigning a person (or job title of the person) responsible for carrying out the emergency procedures.

An assessment of the security threats is designed to look at a specific site, determine vulnerabilities, and develop effective procedures to address these threats. Some of the scenarios may have a higher risk than others; however, appropriate responses need to be developed for all scenarios considered. Recognizing a potential threat is one of the most effective ways of dealing with it.

Consideration needs to be given to vulnerability to theft, sabotage and unauthorized access by staff, contractors, visitors or outsiders, and dealing with unexplained losses. New and/or existing measures should be described or referenced and a copy should be provided with the plan.

When an emergency response plan covering AN is already in place, there is no need to duplicate it in the Security Plan; however, a reference to the emergency response plan must be made. The seller must also ensure to review the emergency response plan to verify that all the requirements listed in this guideline are covered.

### 2.2.1 Controlling Access to AN

Measures must be in place to control access to the AN storage area and sales records. These procedures should address unauthorized personnel gaining access to the AN or the AN sales records during all hours, and may include:

- Those that need to be on site (contractors, visitors, unauthorized employees); and,
- Those who are on site surreptitiously (trespassers).

Mechanisms for access control may include fencing, locks, security systems, or other means of preventing access to the product or the sales records.

The access control measures must be described in the Security Plan or reference must be made to the appropriate procedures, and a copy of the procedures must be included with the plan.

### 2.2.2 Managing Stocks of AN

A stock management system must be put in place and a weekly inventory must be conducted and documented ([s. 460, 461](#)). A stock management system allows a seller to know the quantity of AN currently on hand and allows stock to be reconciled against sales or use. A procedure for dealing with losses must also be developed. As part of the management system, a person or job title of the person responsible for conducting the weekly inventory must be included.

The records may also be used to assist in the annual inventory report required by Natural Resources Canada ([s. 487](#)).

The stock management measures must be described in the Security Plan; or reference must be made to the appropriate procedures, and a copy of the procedures must be included with the plan.

### 2.2.3 Reporting Incidents

If any theft, attempted theft, or tampering with AN is discovered, it must be reported to:

- The local police immediately; and,

- The Chief Inspector of Explosives within 24 hours:
  - Phone: **1-855-912-0012**
  - Email: [nrcan.precursors-precurseurs.rncan@canada.ca](mailto:nrcan.precursors-precurseurs.rncan@canada.ca)

### 2.2.4 Refusing a Sale

Procedures must be developed and employees must be trained in recognizing conditions that could lead to the refusal of sales ([s. 460](#)). If the quantity of AN requested by a buyer is not proportional to their needs and/or it is suspected that AN might be used for criminal purposes, the sale must be refused ([s. 489 \(1\)](#)). If the buyer does not provide sufficient information as per record of sale requirements, the sale of AN must be refused. Other factors that will affect scrutiny of AN sales may include: method of payment, if the customer is new, and/or customer's experience with using AN for legitimate purposes. Procedures to determine need or to assess potential sales to new customers must be developed and employees must be trained in their use.

The refusal of sale measures must be described in the Security Plan or reference must be made to the appropriate procedure, and a copy of the procedure must be included with the plan.

Every refusal to sell AN must be reported to the local police and to the Chief Inspector of Explosives (1-855-912-0012 or [nrcan.precursors-precurseurs.rncan@canada.ca](mailto:nrcan.precursors-precurseurs.rncan@canada.ca)) within 24 hours ([s. 488, 489 \(2\)](#)).

## 3. Additional Regulatory Requirements

There are additional regulatory requirements an AN seller must follow in dealing with access, control, and reporting. It is recommended that the requirements below be discussed in the Security Plan:

- The local police force must be informed in writing of all locations where AN is to be stored or sold ([s. 480](#));
- All doors, windows, or other access points where AN is stored must be locked when not attended ([s. 481 \(1\)](#));
- All main entrances to a building in which ammonium nitrate is stored must be lit at all times outside business hours ([s. 481 \(3\)](#));
- A Key Control Plan must be prepared and implemented ([s. 481 \(2\)](#)) (refer to the *Key Control Plan Guideline (G20-02)* for more details);
- A sign must be posted at each entrance to an AN storage area warning against unauthorized access ([s. 483 \(1\)](#));
- Access to AN storage areas and sales records must be limited to persons authorized by the seller ([s. 483 \(2\), 492 \(3\)](#));
- A list of all employees who work at each location where AN is stored or sold must be kept ([s. 484](#)); and

- Procedures should be put in place for the verification upon receiving an AN shipment ([s. 485](#)), the identification of buyers ([s. 490](#)), and the completion of a record of sale ([s. 492](#)).

### **4. Other Considerations**

#### *4.1 Confidentiality of the Security Plan*

The Security Plan should be treated as a security-sensitive document. The seller should limit and control distribution of the Security Plan and ensure that the original and approved copies of the plan are stored in a secure location.

#### *4.2 Update of the Security Plan*

The Security Plan must be updated every 12 months ([s. 482](#)).

#### *4.3 Employee Training*

Training should be offered to employees regularly to ensure they are familiar with the plan/updated plan and its procedures and their responsibilities to report incidents related to AN.

**APPENDIX**

*Below is an example of an AN Security Plan. It is not required to follow the same format, as long as the requirements are still met. If company policies currently exist that address any of the AN Security Plan requirements, a copy may be placed in attachment or reference may be made as appropriate.*

**-EXAMPLE-  
Ammonium Nitrate Security Plan**

**1. Security Plan for Ammonium Nitrate**

Company Name: ABC Fertilizer  
Address: Brandon, MB  
Last Updated: September 11, 2020  
Next Review: September 2021  
Revision Number: 02  
Security Plan Contact: Jane Doe, 204-999-9988

*Confidentiality of the Security Plan:*

The contents of this AN Security Plan are confidential and are only to be provided to those persons who have a responsibility under the plan. The plan must not be provided to any persons outside ABC Fertilizer except to those persons who have a legitimate need (e.g. Explosives Inspectors, peace officers, fire departments).

*Update of the Security Plan:*

The plan must be updated every 12 months.

*Employee Training:*

Training on the procedures contained in this Security Plan is to be provided to all who will be required to follow them. It is the duty of the person responsible for this Security Plan to ensure all necessary training has been provided and recorded in the employees training file. A review of the training should occur annually to all staff members, and initially to new employees.

**2. AN Seller Information and Site Identification**

Company Name: ABC Fertilizer  
Enrolment Number (LCPO): RC-H009999C  
Address: 205 Wheat King Road, Brandon, MB  
Phone: 204-948-5200  
Fax: 204-948-5195  
Website: www.abcfertilizer.ca  
Email: abcfertilizer@gmail.com  
Site Contact: John Smith, 204-999-9999  
Security Plan Contact: Jane Doe, 204-999-9988

### 3. Site Description

The site is located near the NW outskirts of Brandon, Manitoba. There are two storage sheds on site located approximately 100 meters from a building containing the main office and warehouse. A 6-foot-high chain-link fence surrounds the premises that contain the main office building & warehouse, sheds and adjacent lot. The AN site details have been shared with the Brandon Police Service.

The AN stored is sold mainly to Manitoba and Saskatchewan farmers with up to 2000 kilograms being stored at any one time. The number of employees on site is 13; 4 of which have access to the AN. Most of the AN is delivered to customers. Those customers who come on site for pick-up are only permitted in the areas of the office/warehouse building where their order is verified before it is picked up from a storage shed by a company employee. The sheds can be seen from the office. All building entrances have adequate external lighting at night.

### 4. Emergency Procedures to Address Security Risks

Below are the procedures to address the various security threats. The Security Plan Contact and the Site Contact must be made aware of any incident related to AN as soon as the circumstances permit.

#### a. Theft

To prevent the theft of AN, access to the sheds containing AN is not permitted unless there is an authorized employee present. Employees who have unsupervised access to the AN must be approved to do so by management. Any employee not on the approved list must be accompanied by someone on the list when accessing the AN storage sheds.

#### b. Access to AN

Employees who do not have the proper authorization to access AN must be supervised to do so. Only persons who are deemed suitable by management can access the keys to the AN, which are kept in a lock box in the main office, warehouse. During operating hours, employees at the site will regularly monitor the area around the sheds and will challenge anyone not permitted in the vicinity. The AN sheds are always locked, when not in use. Appropriate signage on the sheds state 'authorized employees only'. To restrict access to the premises during off hours, there is also a closed gate at the sole entrance to the property, which is locked using a separate key. Note: *\*A copy of the AN Key Control Plan is attached.\**

**c. Access to AN Sales Records**

Only staff that require access to records of sale may be able to do so on the ABC Fertilizer online system. This includes staff that conduct the sales of AN, staff that must verify quantities, as well as management. A password protected folder on the local network contains the details required by the Explosives Regulatory Division (ERD). The password is routinely changed every few months.

**d. Stock Management and Unexplained Loss**

AN inventory is recorded electronically. The receiver counts the product received and enters it in the electronic inventory system. The count is verified upon being placed in the storage sheds. AN sold is removed from the shed, verified against the order, and confirmed by the shipper, who enters the sale into the electronic inventory system (formal AN notices from the ERD office are given to AN transporters & users). A weekly physical count of the inventory in the sheds is taken by the shift supervisor and verified against the electronic inventory. If a discrepancy is found, it is to be reported to the manager who will investigate.

**e. Sabotage or Threat from Disgruntled Employee**

The threats from sabotage and disgruntled employees have been considered and the procedures in place to prevent unauthorized access are considered sufficient to mitigate these threats.

**5. Reporting**

**a. Reporting Incidents Involving AN**

All incidents involving AN (theft, attempted theft, loss) are to be reported to the local police immediately and also to the Chief Inspector of Explosives (CIE) within 24 hours. It can be reported to the CIE by calling or emailing your local ERD office and/or:

- Phone: **1-855-912-0012**,
- E-mail: [nrcan.precursors-precurseurs.rncan@canada.ca](mailto:nrcan.precursors-precurseurs.rncan@canada.ca)

**b. Refusing a Sale**

If the quantity of AN requested by a buyer is not proportional to their needs and/or it is suspected that AN might be used for criminal purposes, the sale must be refused. If the buyer does not provide sufficient information as per record of sale requirements, the sale of AN must be refused. Other factors that will affect scrutiny of AN sales may include: method of payment, if the customer is new, and/or customer's experience with using AN

for legitimate purposes. The local police and the CIE will be notified within 24 hours thereafter to report any relevant incident involving a refusal of sale for AN.

**c. Reporting Fire or Explosion**

In the event of a fire or explosion, the fire department is to be notified immediately at **911**. The CIE must be notified as soon as circumstances permit.

**d. Responsibility to Report**

All reporting is the responsibility of the person in charge at the time of the incident with follow-up by the person in charge of the Security Plan for this site.

SAMPLE