



# Guideline for Ammonium Nitrate Security Plan

February 2014

## 1. REQUIREMENTS

As part of the application to become a seller of ammonium nitrate (AN), or of products made from AN, a declaration must be made that a Security Plan has been prepared for each location where AN will be sold or stored. For the storage of AN, the Security Plan must include:

- 1.1 a description of the emergency procedures to be followed in responding to all risk events, including security-related events, and an indication of the title of the person who will be responsible for ensuring that each procedure is followed;
- 1.2 a description of the measures to be taken to control access to the AN, including control of keys; and
- 1.3 a description of the stock management system to be implemented and the title of the person who will be responsible for carrying out weekly inspections of the stock.

If AN is being sold, the Security Plan must also include:

- 1.4 a description of the measures to be taken to control access to sales records; and
- 1.5 a description of the measures to be taken to ensure that the sale of AN will be refused if the quantity requested is not proportional to the buyer's needs or if the component seller or an employee has reasonable grounds to suspect that the AN will be used for a criminal purpose.

The Security Plan must be implemented and updated every 12 months. There are other requirements that must be met, but that do not form part of the Security Plan. Their inclusion is recommended to ensure all security related procedures are in one place. These additional requirements are described in Section 3.6.

When an emergency response plan covering AN is already in place, there is no need to duplicate it in the Security Plan specific to AN; however, a reference to it must be made.

## 2. PURPOSE OF A SECURITY PLAN

The purpose of a Security Plan for AN is to enhance and maintain the security of a seller's operation by assessing a site for security risks, developing measures to address security issues by incorporating current security programs into the plan, and developing new ones if necessary; and to formalize responses to security incidents. It also assigns specific people or positions within a company to specific responsibilities for carrying out or implementing specific portions of the plan. A Security Plan also enables the seller to:

- 2.1 see how various elements of a security program integrate;
- 2.2 set out roles and responsibilities for the security program, thereby ensuring tasks are assigned, understood, documented, tracked, and organized in a consistent manner;

- 2.3 identify partners and resources in regards to enhancing and maintaining the security of its operations; and
- 2.4 adjust security preparations and operations in response to changing circumstances.

### **3. SECURITY PLAN COMPONENTS**

The following sections provide details of the components that a sound Security Plan for AN must contain.

Also addressed in this section are other requirements that must be met, but that do not form part of the Security Plan. Their inclusion, however, is recommended to ensure all security-related procedures are in one place.

#### **3.1 Seller Information**

A Security Plan must be submitted for each location where a seller stores or from which AN is sold. 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 the specified 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 (if different from the person making the application).

#### **3.2 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 procedure(s).

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.

Thought 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.

#### **3.3 Access Control**

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 sales records during business and off 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 sales records.

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

### **3.4 Stock Management System**

A stock management system must be put in place and a weekly inventory must be conducted and documented. As part of the management system, a person or job title of the person responsible for conducting the inspections must be included. As part of the weekly inspection, procedures for dealing with losses must be developed. 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. The records may also be used to assist in the annual inventory report required by the Explosives Regulatory Division of Natural Resources Canada's Explosives Safety and Security Branch.

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

### **3.5 Refusal of Sale**

Procedures must be developed and employees must be trained in recognizing conditions that could lead to the refusal of sales. Some of the conditions that could result in refusal to sell may include cases where the quantity is not proportional to the buyer's needs, the buyer refuses to pay by credit card, or if the seller or an employee has reasonable grounds to suspect that the AN will be used for criminal 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.

### **3.6 Other Considerations**

In addition to the minimum requirements for a Security Plan set out above, there are additional regulatory requirements a seller must follow in dealing with access, control, and reporting. It is recommended that these requirements be included with, or form part of, the Security Plan. This will ensure all required documentation and procedures are located in one place for easy reference. These additional regulatory requirements are as follows:

- 3.6.1 the local police force must be informed in writing of all locations where AN is to be stored or sold (Section 480);
- 3.6.2 all doors, windows, or other access points where AN is stored must be locked when not attended (Section 481(1));
- 3.6.3 a Key Control Plan must be prepared and implemented (Section 481(2)) (a Key Control Plan Guideline G06-06 is available);
- 3.6.4 a sign must be posted at each entrance to an AN storage area warning against unauthorized access (Section 483(1));
- 3.6.5 access to AN storage areas and sales records must be limited to persons authorized by the seller (Section 483(2) and Section 492(3));
- 3.6.6 a list of all employees who work at each location where AN is stored or sold must be kept (Section 484);
- 3.6.7 reporting (Sections 488 and 489(2)):
  - 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, and
  - if there is a refusal to sell, it must be reported to the Chief Inspector of Explosives and the local police within 24 hours; and

- 3.6.8 procedures for verification upon receiving an AN shipment (Section 485), identification of buyers (Section 490), and completing a record of sale (Section 492) should also be available.

### 3.7 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. The Security Plan must be reviewed annually.

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

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