



FERTILIZER CANADA

FERTILISANTS CANADA

APPENDICES

Agricultural Calcium Ammonium Nitrate Security Code of Practice

JANUARY 2019

A circular graphic with a green gradient background, overlaid on a faded industrial facility image. The text 'Where Stewardship Grows' is written in white, bold, sans-serif font.

**Where
Stewardship
Grows**

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SECTION A – INBOUND SHIPMENTS

**SECTIONS A1 & A2 – SECURITY OF INBOUND CAN CARGO
PROVIDING TRANSPORT FROM SOURCE VIA RAIL/TRUCK**

PROTOCOLS:

NO.		Y/N
A1.1	The distribution and/or retail facility has undertaken measures to ensure the security of inbound CAN cargo aboard import vessels.	

NO.		Y/N
A1.2	The distribution and/or retail facility has undertaken measures to ensure the security of inbound CAN cargo aboard railcars/trucks.	

NO.		Y/N
A2	The distribution and/or retail facility has undertaken measures to ensure all companies providing transportation services for CAN have appropriate security measures and clearances.	

AUDIT REQUIREMENTS:

- Signed and dated letter from the receiving facility manager indicating requirements have been reviewed and actions completed
- Letter is current and renewed every two years

NOTE:

- Auditors may spot check documentation to ensure policies are being followed

EXAMPLE COMPLIANCE VERIFICATION LETTER

[TO BE PRINTED ON COMPANY LETTERHEAD]

March 16, 2018

COMPLIANCE VERIFICATION LETTER

To be placed in Calcium Ammonium Nitrate Audit Verification File

In accordance with Protocols A1 & A2 of the Calcium Ammonium Nitrate Security Code of Practice (2019), our facility located at:

Street Address: _____

City/Town: _____

Province: _____

has undertaken a review and is in compliance with the following requirements:

PLEASE CHECK THE BOX IN FRONT OF THE SECTIONS THAT ARE APPLICABLE:

Import by Marine Vessel

The following requirements have been reviewed and our operation is in compliance based upon our internal audit.

Protocol A1.1 – by Marine:

All Companies providing marine transportation services are in compliance with the following:

- *Canada Marine Act*
- *Port Authorities Operations Regulations, Practices and Procedures for Public Ports; Public Ports and Public Port Facilities Regulations*
- *Canada Shipping Act*
- *Cargo, Fumigation and Tackle Regulations*

Protocol A2:

All Companies providing road/rail transportation services inbound to our operation have provided written verification that:

- a) They are bonded or pre-approved by an internal review;
- b) They have adequate insurance coverage before shipment;
- c) They have developed a security plan for shipments or have agreed to operate under the provisions of Section A3 of the Agricultural Calcium Ammonium Nitrate Security Code of Practice; and
- d) They will keep records of the shipment for a minimum of two years.

Import by Rail/Road

The following requirements have been reviewed and our operation is in compliance based upon our internal audit.

Protocol A1.2 – by Rail/Road:

- Carrier agrees to immediately notify the importer/receiver of any theft or tampering during transport.

Protocol A2:

All Companies providing road/rail transportation services inbound to our operation have provided written verification that:

- a) They are bonded or pre-approved by an internal review;
- b) They have adequate insurance coverage before shipment;
- c) They have developed a security plan for shipments or have agreed to operate under the provisions of Section A3 of the Agricultural Calcium Ammonium Nitrate Security Code of Practice; and
- d) They will keep records of the shipment for a minimum of two years.

The signature below signifies that the calcium ammonium nitrate operation listed above is in compliance with the requirements as indicated.

Name (print): _____ **Date:** _____

Position: _____ **Title:** _____

SECTION A3 – ACCESS TO PRODUCT DURING SHIPMENT

PROTOCOL:

NO.		Y/N
A3	The distribution and/or retailer facility has undertaken measures to prevent unauthorized access to CAN during shipment.	

AUDIT REQUIREMENTS:

- Written policy and procedure containing steps to comply with requirements signed by facility manager or designated responsible person
- Records/documentation of policy implementation

NOTE:

- Auditors will spot check documentation to ensure policies are being followed

EXAMPLE ACCESS DURING SHIPMENT POLICY/PROCEDURE

POLICY NAME: Access to Calcium Ammonium Nitrate (CAN) Product during Shipment

OBJECTIVES:

1. To ensure measures are taken to minimize the exposure of CAN to theft or tampering during shipment.
2. To ensure measures are taken to restrict access to CAN during shipment by securing access points on the transport vehicle.
3. To ensure processes are in place to regularly inspect for and report any signs of tampering or theft on vehicles transporting CAN.

CRITICAL TASK PROCEDURES:

- 1. Stops in Transit** – In order to ensure the security of all shipments of CAN, the following measures must be followed:
 - a. If possible, all road shipments of CAN will be delivered from the loading facility to the receiving facility with no stops to minimize risks of tampering.
 - b. If short stops are required (less than 1 hour), the driver must be in constant visual contact with the delivery vehicle at all times.
 - c. If the driver cannot be in constant visual contact with the load during a short stop, all access slides/gates and trailer disconnect points (i.e. fifth wheel or trailer disconnect) on the delivery vehicle must be locked/sealed OR the delivery vehicle parked in a secured compound (i.e. 2-meter chain link fenced compound with locked gates).
- 2. Securing of Access Points** – All gates and hatches on any railcars and trucks delivering CAN must be locked or sealed with a cable-type seal once they have been loaded.
- 3. Inspection of Locks/Seals** – The locks or seals on the gates and hatches on railcars and trucks delivering CAN will be inspected as follows:
 - a. All locks/seals on gates and hatches on railcars and trucks must be initially inspected by the transport operator or the shipper once the railcar/truck is loaded. The bill of lading for the shipment will be initialed by the transport operator or the shipper indicating the locks/seals are in place.
 - b. All locks/seals of trucks are to be inspected at each stop by the transport operator.
 - c. All locks/seals on trucks/railcars will be inspected once they have arrived at destination.

REVIEW:

This policy/procedure is to be reviewed with all existing personnel, reviewed with all new hires and updated at least annually at employee meetings or a dedicated update session.

EXAMPLE TRANSPORT INSPECTION LOG

Consignor (Shipper) Name: Address: City: Prov/State:		Consignee (Destination) Name: Address: City: Prov/State:	
Shipment Date:		Point of Origin (city, prov/state):	
Name of Carrier: Transport Unit #:		Shipping Document #:	
Unit #	Description of Articles	Net Weight (scale ticket)	
Consignor Contact #:			

SECURITY INSPECTIONS – NOTE: INSPECTIONS MUST BE CONDUCTED AFTER EACH STOP

Date (MM/DD/YY)	Time of Inspection	Location of Inspection	Evidence of Tampering with Hatch Locks or Seals? (Y/N)	Hatch Locks or Seals Broken? (Y/N)	Breach of Truck Cabin or other? (Y/N)	Evidence of Product Loss? (Y/N)

If “Yes” (Y) was selected for any of the above, please fill out the following accordingly:

Estimated Weight of Product Loss (Quantity/Weight):	
Description of Damage/Tampering:	Comments:

SECTION A4 – LOSS OR TAMPERING OF PRODUCT DURING SHIPMENT

PROTOCOL:

NO.		Y/N
A4	The distribution and/or retail facility has undertaken measures to assess, investigate and report shortages in shipments of CAN.	

AUDIT REQUIREMENTS:

- Written policy and procedure with steps to comply with the requirements of this section signed by the facility manager or designated responsible person
- Records/documentation of policy implementation

NOTE:

- Auditors will spot check documentation to ensure policies are being followed

EXAMPLE LOSS/TAMPERING POLICY/PROCEDURE

POLICY NAME: Loss or Tampering of Product during Shipment

OBJECTIVES:

1. To identify loss of calcium ammonium nitrate (CAN) during shipment.
2. To identify potential tampering of the transport vehicle while in transit.

CRITICAL TASK PROCEDURES:

- 1. Tampering of Locks/Seals** – All locks and/or seals on the gates and hatches on the truck/railcar will be inspected prior to unloading to ensure they are not missing, broken or tampered with. Any missing or tampered locks and/or seals will be documented and reported to management immediately.
- 2. Verification of Quantities** – In order to verify the actual quantities of the load at destination versus the shipped weights, the following steps must be taken:
 - a. If the receiving facility is equipped with a scale system large enough to weigh the transport vehicle, the net weight of the load will be determined and compared to the shipped weights.
 - b. If the receiving facility is not equipped with a scale system large enough to weigh the transport vehicle, the load will be visually inspected for any short compartments.
 - c. Railcar shipments will be visually inspected for any short compartments prior to unload at destination.
 - d. Any shortages beyond historical norms of 1% of the shipped weight will be documented and reported to management.

REVIEW:

This policy/procedure is to be reviewed with all existing personnel, reviewed with all new hires and updated at least annually at employee meetings or a dedicated update session.

Reporting Requirements – Management Responsibilities:

The company must report any loss, tampering, theft or attempted theft immediately to the seller and local authorities. Management may choose to report the incident separately to the Suspicious Incident Reporting (SIR) Program through the Royal Canadian Mounted Police.

SECTION A5 – DELIVERY OF CALCIUM AMMONIUM NITRATE

PROTOCOL:

NO.		Y/N
A5	The distribution and/or retail facility has undertaken measures to ensure proper documentation and authorization of all incoming deliveries of CAN.	

AUDIT REQUIREMENTS:

- Written policy and procedure with steps to comply with the requirements of this section signed by the facility manager or designated responsible person
- Records/documentation of policy implementation

NOTE:

- Auditors will spot check documentation to ensure policies are being followed

EXAMPLE DELIVERY AUTHORIZATION POLICY/PROCEDURE

POLICY NAME: Calcium Ammonium Nitrate (CAN) Delivery Authorization

OBJECTIVES:

1. To ensure proper authorization and clearance for delivery of CAN to avoid delivery errors.
2. To ensure accurate and complete documentation for all loads of CAN prior to authorization for unload.
3. To ensure all deliveries of CAN arrive as scheduled at their designated destination and to identify loads that have been delayed or lost.

CRITICAL TASK PROCEDURES:

- 1. Documentation Review Prior to Unloading** – Prior to authorizing a shipment/unload at a CAN storage site, the receiver must:
 - a. Verify the name and physical address of the company supplying the CAN (i.e. importer, manufacturer or distributor).
 - b. Verify the quantity of CAN being ordered.
 - c. Verify the name and address of the receiving company.
 - d. Verify the storage location identified on the shipping documents.
 - e. Verify the projected date of delivery.
- 2. Authorization for Unloading of Shipment** – Prior to unloading the CAN shipment, the transport operator must:
 - a. Have written or verbal authorization for unload from the receiving company.
 - b. Confirm the address for the delivery.
 - c. Have a written or verbal indication of the exact storage location for the load to be deposited on the storage site.
 - d. Have a representative from the receiving company sign the bill of lading.
- 3. Verification of Arrival at Destination** – In order to verify the arrival of a shipment of CAN:
 - a. The shipping company will determine an estimated time of arrival for the shipment based upon the distance to the receiving location.

- b. The transport operator will notify dispatch upon arrival at the storage location. Alternatively, dispatch can call the receiving location after estimated time of arrival.
- c. The transport operator will notify dispatch of any delays or mechanical problems that may delay the delivery time.
- d. The dispatcher will monitor the delivery time in order to determine if the estimated time of arrival has been exceeded. If it has, the dispatcher will attempt to contact the transport operator/receiver. If any issues are identified, the management of the shipping company will be notified immediately.

REVIEW:

This policy/procedure is to be reviewed with all existing personnel, reviewed with all new hires and updated at least annually at employee meetings or a dedicated update session.

SECTION B – STORAGE OF CALCIUM AMMONIUM NITRATE

SECTION B1 – PRODUCT STORAGE SECURITY

PROTOCOL:

NO.		Y/N
B1	The distribution and/or retail facility has undertaken measures to ensure the security of CAN storage.	

AUDIT REQUIREMENTS:

- Implementation of security measures
- Weekly inspection records

NOTE:

- Auditors will spot check procedures, records and perform a visual inspection of the CAN storage facility

EXAMPLE KEY CONTROL SYSTEM POLICY/PROCEDURE

POLICY NAME: Key Control System for Calcium Ammonium Nitrate (CAN) Storage

OBJECTIVES:

To control and track access to all keys to CAN storage.

CRITICAL TASK PROCEDURES:

In order to control the assignment and tracking of keys that provide access to CAN storage, a key control system has been implemented. The critical requirements for this system are:

- 1. Duplication of Keys** – All duplication of keys that provide access to the CAN storage areas is done under the strict consent of the facility manager. NO duplication is allowed without the written consent of the facility manager.
- 2. Assignment of Locksmith** – A designated licensed locksmith has been chosen to manage all duplication of keys providing access to CAN. The locksmith has been instructed in writing to not duplicate any keys for the facility without written consent from the facility manager.
- 3. Marking of Keys** – The locksmith has been instructed to mark all keys as “Do Not Duplicate” (DND) and keys have been stamped with an identification number.
- 4. Approval for Assignment of Keys** – Assignment of keys is to be done with the approval of the facility manager.
- 5. Documentation for Assignment of Keys** – Assignment of keys must be documented utilizing the “Key Control Tracking Sheet”.
- 6. Retrieval of Keys** – All assigned keys will be retrieved from employees once they are re-assigned to a new area of responsibility or leave the company.
- 7. Lending of Keys** – Employees who have been assigned CAN storage keys must not lend the keys to other employees or individuals. They are solely responsible for the care and custody of the keys in their possession.

REVIEW:

This policy/procedure is to be reviewed with all existing personnel, reviewed with all new hires and updated at least annually at employee meetings or a dedicated update session.

EXAMPLE KEY CONTROL LOG

CALCIUM AMMONIUM NITRATE KEY CONTROL SYSTEM

Date of Assignment of Key	Key ID #	Employee Name	Employee Signature	Manager Signature Of Approval	Date of Return of Key	Employee Signature on Return	Manager Signature Verifying Return

Policy Created: _____

Last Reviewed and Updated: _____

EXAMPLE WEEKLY SECURITY CHECKLIST

Section B1 – Weekly Security Inspection Checklist			
Date: _____	Time: _____		
Inspector: _____			
	Yes	No	Notes:
Perimeter Security (if applicable)			
Fencing in good condition	<input type="checkbox"/>	<input type="checkbox"/>	
Padlocks present and secure	<input type="checkbox"/>	<input type="checkbox"/>	
Ground around fencing in good condition	<input type="checkbox"/>	<input type="checkbox"/>	
Lighting	<input type="checkbox"/>	<input type="checkbox"/>	
Facility Security			
Doors and entrances in good condition	<input type="checkbox"/>	<input type="checkbox"/>	
Locks on Doors and Entrance ways	<input type="checkbox"/>	<input type="checkbox"/>	
Windows in good condition	<input type="checkbox"/>	<input type="checkbox"/>	
Locks on windows present and secure	<input type="checkbox"/>	<input type="checkbox"/>	
Signage – intact and visible	<input type="checkbox"/>	<input type="checkbox"/>	
Lighting present and operational	<input type="checkbox"/>	<input type="checkbox"/>	
Access to Facility			
Documentation is complete for visitors	<input type="checkbox"/>	<input type="checkbox"/>	
Documentation of authorized personnel is complete	<input type="checkbox"/>	<input type="checkbox"/>	
_____ Inspector's Signature			

SECTION B2 – SECURITY PLAN

PROTOCOL:

NO.		Y/N
B2	The distribution and/or retail facility has a written, up-to-date security plan that has been disclosed to local law enforcement on an annual basis.	

AUDIT REQUIREMENTS:

- Completed security plan, updated annually, signed by the facility manager
- Letter or other documentation notifying the local authorities of the presence of CAN at the retail facility

NOTE:

- Auditors will verify the presence of an up-to-date security plan and documentation confirming notification of local authorities

EXAMPLE SECURITY PLAN

Templates to follow - In preparation by NRCan

EXAMPLE NOTIFICATION LETTER TO LOCAL AUTHORITIES

March 16, 2018

Mr. John Smith
Anytown Police Chief
1234 Main Street
Anytown, ON, T6T 7T9

Dear Chief Smith:

As part of our annual review and update of our security plan at our fertilizer storage facility, we would like to inform you of the presence of agricultural calcium ammonium nitrate at the storage facility located at:

6456 Storm Road
Anytown, ON

We typically store calcium ammonium nitrate in quantities of XX tonnes. This inventory can fluctuate up and down throughout the year depending on the season. We have implemented security precautions to ensure the security of this product and report any suspicious incidents.

If you have any questions, please do not hesitate to call me at (613) 777-8000.

Sincerely,

Joe Barnes
Facility Manager
A1 Fertilizer Services Ltd.

SECTION B3 – ACCESS BY ONSITE PERSONNEL

PROTOCOL:

NO.		Y/N
B3	The distribution and/or retail facility has procedures in place to ensure proper security clearance and authorization for employees handling CAN.	

AUDIT REQUIREMENTS:

- Written policy and procedure with steps to comply with the requirements of this section signed by the facility manager or designated responsible person

EXAMPLE PERSONNEL SECURITY POLICY/PROCEDURE

POLICY NAME: Calcium Ammonium Nitrate (CAN) Facility Personnel Security

OBJECTIVES:

1. To ensure adequate review of employee past work references.
2. To ensure adequate review of contractor past work references.

CRITICAL TASK PROCEDURES:

In order to ensure adequate review of employees and non-employees working at the storage facility, the following requirements are to be followed:

1. **Existing Employees** – All employees who have worked less than five years at the storage facility must provide at least two past work references. If this is not possible, the employee may elect to provide personal references from two persons in the community who cannot be a relative of the employee.
2. **Past Work References for New Hires** – As a condition of employment, all new hires must consent to disclose any previous criminal convictions. In addition, they must provide a minimum of two past work references that can be validated by the hiring manager.
3. **Contractors** – All contractors must provide documentation indicating past work references that can be validated by the hiring manager prior to authorization to proceed with work. This requirement is waived if the contractor has an established work history with the facility that satisfies the facility manager that there is not security risk.
4. **Written Authorization for Contractors** – All contractors providing services at the CAN storage facility must have documentation from the facility manager, or designate, authorizing them to perform the work. The documentation must include the date of authorization, the name of the contractor, a description of the work to be performed and the signature of the facility manager.

REVIEW:

This policy/procedure is to be reviewed with all existing personnel, reviewed with all new hires and updated at least annually at employee meetings or a dedicated update session.

SECTION B4 – LOSS OF PRODUCT DURING STORAGE

PROTOCOL:

NO.		Y/N
B4	The distribution and/or retail facility has developed and implemented a process to assess, investigate and report shortages in the storage of CAN.	

AUDIT REQUIREMENTS:

- Written policy and procedure with steps to comply with the requirements of this section signed by the facility manager or designated responsible person
- Records/documentation of policy implementation

NOTE:

- Auditor will spot check records and perform a visual inspection of the CAN facility

EXAMPLE INVENTORY MANAGEMENT POLICY/PROCEDURE

POLICY NAME: Calcium Ammonium Nitrate (CAN) Inventory Management

OBJECTIVES:

1. To identify shortages of in the CAN inventory above historical levels.
2. To investigate shortages in order to determine cause.

CRITICAL TASK PROCEDURES:

In order to ensure adequate reconciliation of actual inventory levels against stated inventory levels, the following actions are required:

- 1. Inventory Audit Reconciliation** – The storage facility will conduct an annual reconciliation of inventory levels at the storage facility. A weighed audit at points of low inventory is the preferred approach. However, if a weighed audit is not possible, an estimate can be conducted. The procedure for both of these processes, including the process for counting bagged product, is as follows:

a. Bulk Weighed Audit

- i. All remaining inventory in the storage facility must be unloaded and the product weighed.
- ii. The actual weight of the weighed product will be compared to the stated inventory level in order to determine the discrepancy in inventory.

b. Estimated Inventory Audit

- i. The approximate volume of the product remaining in storage will be determined by measuring the size of the pile remaining in storage.
- ii. The dimensions of the pile will then be used to determine the volume of the pile.
- iii. Utilizing the density of the product by volume, the weight of the product will be determined and compared to the stated inventory level to determine the discrepancy in inventory.

c. Bagged Product

- i. The number of bags of CAN will be counted including any damaged bags that may have been repackaged.
- ii. The actual of bags will be compared to the stated inventory level in order to determine the discrepancy in inventory.

- 2. Reporting** – Any discrepancy in the amount of product will be documented, investigated for potential cause and reported to management. A discrepancy

greater than 1% (or the historical norm of the site) of the product sold between actual/estimated weight of the product and the stated value will be documented, investigated for potential cause and reported to management.

- 3. Weekly Inspection** – A weekly inspection will be conducted on all CAN storage areas to identify any tampering or loss of product. If any tampering or product loss is noted, it must be reported immediately to management.

REVIEW:

This policy/procedure is to be reviewed with all existing personnel, reviewed with all new hires and updated at least annually at employee meetings or a dedicated update session.

EXAMPLE WEEKLY INVENTORY INSPECTION CHECKLIST

Storage Area A

Date	Time	Evidence of Loss? (Y/N)	Evidence of Tampering (Y/N)	Inspector's Initials	Notes

Storage Area B

Date	Time	Evidence of Loss? (Y/N)	Evidence of Tampering (Y/N)	Inspector's Initials	Notes

SECTION C – OUTBOUND SHIPMENTS/PRODUCT SALES

SECTION C1.1 – SECURITY AROUND INDIVIDUALS OR COMPANY RESPONSIBLE FOR PROVIDING TRANSPORTATION

PROTOCOL:

NO.		Y/N
C1.1	The distribution and/or retail facility has undertaken measures to ensure that all companies providing transportation services for CAN have implemented appropriate security clearances.	

AUDIT REQUIREMENTS:

- Written policy and procedure with steps to comply with the requirements of this section signed by the facility manager or designated responsible person

EXAMPLE TRANSPORT CERTIFICATION POLICY/PROCEDURE

POLICY NAME: Calcium Ammonium Nitrate (CAN) Transport Company Certification

OBJECTIVES:

1. To ensure proper review of companies providing transportation services for CAN.
2. To ensure transport companies have proper insurance coverage.
3. To ensure transport companies will treat CAN shipments as security-sensitive.
4. To ensure transport companies retain records of CAN shipments.

CRITICAL TASK PROCEDURES:

Prior to issuing clearance to the transportation company to transport a load of CAN, the following requirements must be completed and verified in writing by the transport company:

1. **Bonding or Pre-Approval** – The transport company must be able to provide written proof of bonding or be pre-approved by an internal review.
2. **Insurance** – The transport company must be able to provide a certificate of insurance that will cover the shipment of CAN. Amount of coverage to be set at a minimum \$5,000,000 per shipment in aggregate.
3. **Security Plan** – The transport company must provide written verification that they have developed a security plan for CAN shipments that includes the security measures defined in Section C2 of the Calcium Ammonium Nitrate Security Code of Practice. The written verification also indicates that all transport operators have been trained on the security plan.
4. **Records of Shipments** – The transport company has provided written verification that records of CAN shipments will be kept for a minimum of two years.

REVIEW:

This policy/procedure is to be reviewed with all existing personnel, reviewed with all new hires and updated at least annually at employee meetings or a dedicated update session.

SECTION C1.2 – DELIVERY RECEIPT ACKNOWLEDGEMENT

PROTOCOL:

NO.		Y/N
C1.2	The distribution and/or retail facility has implemented measures to ensure proper receipt acknowledgement by the retailer/ end-user upon arrival of the shipment at destination.	

AUDIT REQUIREMENTS:

- Written policy and procedure with steps to comply with the requirements of this section signed by the facility manager or designated responsible person
- Records/documentation of policy implementation

NOTE:

- Auditor will spot check records shipping records

EXAMPLE POLICY FOR OBTAINING A DELIVERY RECEIPT ACKNOWLEDGEMENT FROM BUYER

POLICY NAME: Calcium Ammonium Nitrate (CAN) Delivery Receipt Acknowledgement

OBJECTIVES:

1. To ensure the customer receives the shipment as per the product order.
2. To ensure customer is prepared to receive the shipment and to acknowledge ownership.

CRITICAL TASK PROCEDURES:

1. Carrier must obtain a signature from the customer prior to offloading.
2. Customer to confirm quantity received.

REVIEW:

This policy/procedure is to be reviewed with all existing personnel, reviewed with all new hires and updated at least annually at employee meetings or a dedicated update session.

SECTION C2 – ACCESS TO PRODUCT DURING SHIPMENT

PROTOCOL:

NO.		Y/N
C2	The distribution and/or retailer facility has undertaken measures to prevent unauthorized access to CAN during shipment.	

AUDIT REQUIREMENTS:

- Written policy and procedure with steps to comply with the requirements of this section signed by the facility manager or designated responsible person

EXAMPLE OF IN TRANSIT SECURITY POLICY/PROCEDURE

POLICY NAME: Security of Calcium Ammonium Nitrate (CAN) in Transit

OBJECTIVES:

1. To ensure measures are taken to minimize the exposure of CAN to theft or tampering during shipment.
2. To ensure measures are taken to restrict access to CAN during shipment by securing access points on the transport vehicle.
3. To ensure processes are in place to regularly inspect for and report any signs of tampering or theft on vehicles transporting CAN.

CRITICAL TASK PROCEDURES:

- 1. Stops in Transit** – In order to ensure the security of all shipments of CAN, the following measures must be followed:
 - a. If possible, all road shipments of CAN will be delivered from the loading facility to the receiving facility with no stops to minimize risks of tampering.
 - b. If short stops are required (less than 1 hour), the driver must be in constant visual contact with the delivery vehicle at all times.
 - c. If the driver cannot be in constant visual contact with the load during a short stop, all access slides/gates and trailer disconnect points (i.e. fifth wheel or trailer disconnect) on the delivery vehicle will have to be locked OR the delivery vehicle parked in a secured compound (i.e. 2-meter chain link fenced compound with locked gates).
- 2. Securing of Access Points** – All gates and hatches on any railcars and trucks delivering CAN must be locked or sealed with a cable type seal once they have been loaded.
- 3. Inspection of Locks/Seals** – The locks/seals on the gates and hatches on railcars and trucks delivering CAN will be inspected as follows:
 - a. All locks/seals on gates and hatches on railcars and trucks must be initially inspected by the transport operator or the shipper once the railcar/truck is loaded. The bill of lading for the shipment will be initialed by the transport operator or the shipper indicating the seals are in place.
 - b. All locks/seals of trucks are to be inspected at each stop by the transport operator.
 - c. All locks/seals on trucks/railcars will be inspected once they have arrived at destination.

- d. If at any point the transport operator discovers that CAN has been stolen or tampered with, or that there has been an attempt to steal or tamper with it, the driver must immediately notify the seller so that the local police can be contacted.

REVIEW:

This policy/procedure is to be reviewed with all existing personnel, reviewed with all new hires and updated at least annually at employee meetings or a dedicated update session.

SECTION C3 – VALIDATION OF CUSTOMERS

PROTOCOL:

NO.		Y/N
C3	The distribution and/or retail storage facility has undertaken measures to ensure all CAN customers have been validated.	

AUDIT REQUIREMENTS:

- Written policy and procedure with steps to comply with the requirements of this section signed by the facility manager or designated responsible person
- Records/documentation of policy implementation

NOTE:

- Auditor will spot check records shipping records

EXAMPLE CUSTOMER VALIDATION POLICY/PROCEDURE

POLICY NAME: Validation of Calcium Ammonium Nitrate (CAN) Customers

OBJECTIVES:

1. To ensure proper review of all direct to end use shipments of CAN from a manufacturer/distributor to an end user.

CRITICAL TASK PROCEDURES:

Prior to issuing clearance for a direct to end use shipment, the retailer coordinating the shipment must provide written verification of the following requirements:

1. **Customer Validation** – The retail has validated the customer through the provision of identification such as one of the following:
 - Pesticide License
 - Government-issued photo identification
 - Two pieces of identification; both with buyer's name, at least one government-issued and at least one with the buyer's address
 - Proof of registration under the Controlled Goods Regulations
 - Producteur Agricole number
 - If the purchaser is a reseller, proof of the purchaser's enrolment on the component sellers list
2. **Validation of Size of Order** – The retail has validated the size of the order of CAN against the size of area to be applied and the application rate.
3. **Knowledge of End User** – The retail has verified that they have knowledge of the end user and the need for CAN is legitimate.
4. **Delivery Authorization** – Once the retail has completed their review, they will issue written authorization to the manufacturer/distributor for the shipment that includes:
 - a. The defined location for the delivery
 - b. The date of the order
 - c. Contact numbers for the retail location and the end user

REVIEW:

This policy/procedure is to be reviewed with all existing personnel, reviewed with all new hires and updated at least annually at employee meetings or a dedicated update session.

SECTION C4 – TRACEABILITY OF SALES RECORDS

PROTOCOL:

NO.		Y/N
C4	The distribution and/or retail facility has documentation to track sales of CAN for the past 24 months.	

AUDIT REQUIREMENTS:

- Written policy and procedure with steps to comply with the requirements of this section signed by the facility manager or designated responsible person
- Records/documentation of policy implementation

NOTE:

- Auditor will spot check shipping records

EXAMPLE OF RECORD RETENTION POLICY/PROCEDURE

POLICY NAME: Record Retention for Shipments of Calcium Ammonium Nitrate (CAN)

OBJECTIVES:

1. To ensure proper and accurate record retention for CAN sales.

CRITICAL TASK PROCEDURES:

All CAN records of sales must be kept for a minimum of two years and must provide the following information:

- a. Customer's name
- b. Customer's address or legal land description
- c. Customer's telephone number
- d. Identification: type of document verified
- e. Quantity of CAN (bulk or bagged)
- f. Trade name, quantity and package size of CAN (bagged) sold
- g. Description of how the CAN will be used
- h. Carrier and operator details
- i. Dates of delivery (estimated and actual)
- j. Location of delivery
- k. If delivery is made at the time of purchase, a receipt signed by the purchaser containing the information contained in the above

The records will be kept in either paper or electronic form.

REVIEW:

This policy/procedure is to be reviewed with all existing personnel, reviewed with all new hires and updated at least annually at employee meetings or a dedicated update session.

NOTE: All information collected respecting the sale of CAN must be kept under lock and key or password protection in the case of electronic records, and may be accessed only by persons who require such access in the course of their employment. The collection, use and protection of the information above must also comply with the obligations under the *Personal Information Protection and Electronic Documents Act* (PIPEDA).

SECTION C5 – CRITERIA SPECIFIC TO END-USERS (CUSTOMERS)
– POST SEASON STORAGE OF CALCIUM AMMONIUM NITRATE
– COMMUNICATION OF END USER STORAGE SAFETY AND SECURITY
– USAGE DOCUMENTATION AND RECORD KEEPING
– SMALL QUANTITY PURCHASERS INFORMATION

PROTOCOLS

NO.		Y/N
C5.1	The retail storage facility has provided communication to the end-use customer that post-season storage of CAN should be avoided if possible by matching purchase quantity with agronomic need.	

NO.		Y/N
C5.2	The retail storage facility has provided guidance and recommendations to the end-use customer for enhancing the safety and security of CAN storage on their farm.	

NO.		Y/N
C5.3	The distribution and/or retail storage facility has provided recommendations to all end-user customers of CAN to maintain consumption and post season storage information for a period of 24 months.	

NO.		Y/N
C5.4	The distribution and/or retail storage facility has provided information to and has documentation to demonstrate that all small quantity purchasers of CAN have reviewed and indicated their understanding of the Fertilizer Canada Calcium Ammonium Nitrate Safety and Security Information brochure prior to sale.	

AUDIT REQUIREMENTS:

- Written guidelines and procedures for customer communications or Fertilizer Canada’s brochure
- Signed small quantities acknowledgement form with copies of associated sales receipt or purchase order
- Records/documentation of policy implementation

NOTE:

- Auditor will spot check communication records

EXAMPLE HANDOUT MATERIAL TO END-USERS/CUSTOMERS

Some Important Points to Remember when Storing Calcium Ammonium Nitrate (CAN):

Post-season storage of calcium ammonium nitrate should be avoided if possible by matching the amount purchased with the amount needed on-farm. However, if left over product must be stored, here are some important points to remember when storing CAN:

1. Segregation from non-compatible products

Maintaining a clean storage area is key for safe storage. High levels of contamination with incompatible products can decrease the stability of the product. The storage area for CAN must be kept free from the following incompatible products to avoid contamination:

- **Fuels** – Such as gasoline, diesel fuel, oil, etc. This includes storing near fuel powered vehicles. .
- **Combustible or other Organic Material** – Such as grease, sawdust, grains, seeds, etc.

Please consult your provincial Building, Electrical and Fire Codes for storage area construction requirements.

2. Site Security

It is recommended that basic security measures be taken for the CAN storage area. These measures could include:

- **Securing of Product** – Any unused product must be secured. CAN remaining in an applicator or other equipment should also be parked in a secured location.
- **Securing of Access Points** – All doors, windows and other points of access to buildings storing bagged or bulk CAN are secured with a high quality lock. Any bin gates providing access to storage bins containing CAN be locked and secured. It is recommended that the locking device be designed to be resistant to bolt cutters.
- **Perimeter Security** – Where possible, 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 CAN. 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.
- **Security System** – It is a recommended best practice to equip all buildings storing CAN 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 from dusk to dawn and can be motion activated.
3. **Fire Suppression** – Only water should be used for CAN fires. A fire suppression system containing sufficient amounts of water must be available near the area being used to store CAN. Chemical fire extinguishers, foam or attempts to smother a fire should not be used. Serious fire conditions should be left to your local fire department.

The local fire department must be made aware if you intend to store over 1000kg of CAN on your farm. Please consult your provincial Fire Code for more information on the requirements in your area.
 4. **Records of Application** – It is a best practice to keep a paper trail including records of all CAN purchases, in-season usage and post season storage for two years.
 5. **Reporting** – Any sign of theft, attempted theft, or tampering and any loss that is not attributable to normal operations must be immediately reported to the local police force.
 6. **Small Quantities** – Smaller bags of CAN are a particular target for theft. Extra care needs to be taken to ensure access is controlled and inventory is reconciled on a frequent basis.
 7. **Re-sale of Calcium Ammonium Nitrate** – Re-selling of CAN should be avoided.

EXAMPLE OF SMALL QUANTITIES ACKNOWLEDGEMENT FORM

"I, customer name, confirm that I have read the information provided in the name of information package and affirm that I understand the best practices regarding the safe and secure handling and use of calcium ammonium nitrate. Without limitation to my other legal obligations, I affirm that I will to the best of my abilities:

- (a) NOT sell, give or make available calcium ammonium nitrate to another person;
- (b) Secure the calcium ammonium nitrate to prevent theft or inappropriate use, and;
- (c) Report any theft, attempted theft, tampering or loss to the police.

I have read and understand the name of information package.

Customer Signature: _____ Date: _____

Witness Signature: _____ Date: _____
(Retailer)

SECTION D – TRAINING RECORDS

SECTION D – TRAINING

PROTOCOL:

NO.		Y/N
D1	All distribution and/or retail facilities involved in the storage, handling and/or selling of CAN should ensure employees have received training on the Fertilizer Canada e-Learning Calcium Ammonium Nitrate Security Course, renewed annually. At a minimum Site and/or Operation Managers are required to have successfully completed the course.	

AUDIT REQUIREMENTS:

- Record of course completion through certificate with expiration date

EXAMPLE TRAINING RECORD RETENTION POLICY/PROCEDURE

POLICY NAME: Employee Training for Calcium Ammonium Nitrate (CAN)

OBJECTIVES:

1. To ensure retail employees working with CAN have received training on safe and secure, storage and handling of CAN.

CRITICAL TASK PROCEDURES:

Employees should complete the following training:

1. Fertilizer Canada e-Learning

- Completion of the “Calcium Ammonium Nitrate Security” course.
- Certificate of completion is sufficient to demonstrate successful completion of the online ammonium nitrate training course.
- All employees should complete the course annually.

The records will be kept in either paper or electronic form.

REVIEW:

This policy/procedure is to be reviewed with all existing personnel, reviewed with all new hires and updated at least annually at employee meetings or a dedicated update session.