

Agricultural Calcium Ammonium Nitrate Security Code of Practice – Amendments & Clarifications

Section	Description	Item	Current Language	Final Amendment Language
-	Storage of AN and CAN	<p>Clarification – Does a process exist for sites which have already completed the audit requirements to achieve their certification under the AN Code of Practice to fast track certification for CAN? Would a site storing both products have to do separate audits for both programs or would they automatically be considered compliant with the new CAN Code?</p> <p>Request for a protocol/statement to this topic be included.</p>	N/A	<p><u>Combined Audits</u></p> <p>Sites handling or storing both AN and CAN may be eligible for a combined audit. This process expedites the audit process by jointly accessing the requirements under the Agricultural Ammonium Nitrate Code of Practice (AN Code) and the Agricultural Calcium Ammonium Nitrate Security Code of Practice (CAN Code). Spot checks conducted by the auditor as part of this process of the relevant documents and physical requirements will still include both products.</p> <p>Audits performed to re-instate a lapsed certification under either Code must be completed in full.</p> <p>For more information, please contact the CAN Code Program Manager at:</p> <p>Tel: 1-877-236-AWSA (2972) Fax: (416) 968-6818 Email: awsa@funnel.ca</p> <p><i>Rationale:</i> <i>A process exists under AWSA, who jointly administers this program, for combining common program requirements and audit processes between different programs into a joint audit. This process would also be applicable to Fertilizer Canada’s Codes of Practice where eligible.</i></p> <p><i>The AWSA program typically requires sites to complete a separate initial audit for the new program before a combined audit can be completed. However, given the similarities in the security requirements under the AN Code and the requirements of CAN Security Code, sites which store AN and whose AN Code certification is in “good standing” will have access to the option of a combined audit. In this case, sites who choose to complete their initial CAN Security Code audit during their next scheduled AN audit (prior to the December 31, 2019 deadline) can do so as a combined audit. If a site does not choose to perform a combined audit for their initial CAN Security Code audit, a combined audit process can be adopted at any time so long as</i></p>

Section	Description	Item	Current Language	Final Amendment Language
				<i>timing of the audit does not allow certification under either program to expire. This may mean advancing an audit prior to the sites certification expiry.</i>
-	French Translation	Amendment – The term used for CAN in the French language version of the CAN Security Code is “Nitrate d’ammonium et de calcium” which is not consistent with the term used throughout industry.	Nitrate d’ammonium et de calcium	The French language CAN Code will be corrected to include the term “Ammonitrate de calcium”.
-	Compliance Requirement Date	Amendment to the deadline for compliance.	Compliance Requirement Date: January 1, 2019	Compliance Requirement Date: December 31, 2019 <i>Rationale:</i> <i>Extra time has been provided for sites to complete their audits and implement any outstanding actions. Audits will begin January 1, 2019. It is recommended that sites complete their audit prior to September 30, 2019 to ensure completion of any compliance actions by the deadline. Certification deadline is December 31, 2019.</i> <i>A pre-audit period is scheduled from March – December 2018 which will allow sites to work with an auditor to go through the CAN Code requirements and assess their current operations. This process helps provide a head start on what a site will be required to do prior to their actual audit. A pre-audit showing that a site meets all requirements of the CAN Code will be qualified for early certification.</i>
Preface	Definition of CAN	Clarification requested on the CAN products captured under the CAN Security Code, the treatment of CAN blends and the meaning of “carbonaceous material”.	The CAN Code applies to all CAN products meeting the following criteria: <i>Mixtures of dry, solid ammonium nitrate and carbonaceous materials (e.g. calcium carbonate/limestone and/or calcium magnesium carbonate/dolomite) containing greater than 60% ammonium nitrate and a minimum 20% carbonaceous material.</i>	Calcium ammonium nitrate (CAN) is defined under this Code as: <i>A fertilizer containing as its essential ingredients only AN and calcium carbonate (for instance limestone) and/or magnesium carbonate and calcium carbonate (for instance dolomite), prepared as a homogenous prill or granule, which:</i> <ul style="list-style-type: none"> <i>i. Has a maximum combustible material content, expressed as carbon, of 0.4% by weight; and</i> <i>ii. Has a minimum content of carbonates of 20% by weight with a purity level of 90% by weight</i> <i>The CAN Code applies to all dry, solid products which will be used</i>

Section	Description	Item	Current Language	Final Amendment Language
				<p>for agriculture and which meet the following criteria:</p> <ul style="list-style-type: none"> a) Are designated as CAN as per the definition above and have a total AN content greater than 70% but less than 80% by weight; or b) Are mixtures/blends containing CAN as defined above and where the total AN content of the mixture/contains greater than 70% but less than 80% AN; or c) Are physical mixtures of AN and carbonates giving the same average chemical composition as the definition above where the total AN content of the mixture contains greater than 70% but less than 80% AN¹. <p>¹While physical mixtures have an equivalent level of security sensitivity due to their same average chemical composition as CAN, it must be noted that physical mixtures (e.g. AN and limestone chips) do not meet the definition of CAN as stated here and will not have the same chemical properties as a product which meets the definition of CAN above.</p> <p>Rationale: Blends which are above the minimum AN content would be captured. However, it is recognized that CAN may be blended prior to delivery with other products for specific farm nutrient requirements. The intent of the CAN Security Code is to apply security requirements on CAN or blends which still have a high content of CAN which will be used for agriculture. In light of this, the definition has been amended to clarify the scope of products captured.</p>
A2 a)	Providing Transportation From Source Via Rail/Truck – Transport Company Security Requirements	Clarity requested on bonding or pre-approval of a transportation company.	The transportation company will: a) Be bonded or pre-approved.	No changes. Rationale: Language to be added to the CAN Security Code Implementation Guide (see below).
A2 a) – IG			Bonding or Pre-approval – The transportation firm has either been bonded or has been pre-approved. A record must be available from the company responsible for the shipment 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.	Bonding or Pre-approval – Bonding or pre-approval of the transportation company through internal review is intended to validate the driver(s) and services to be provided and minimize security risks to the retail site when shipping a security-sensitive product. A record must be available from the company responsible for the shipment indicating that the transportation firm has been bonded or pre-approved by internal review. The pre-approval process must include a review of past references,

Section	Description	Item	Current Language	Final Amendment Language
				<p>licensing and any necessary certifications.</p> <p><i>Rationale:</i> <i>Bonding of a person or transportation company provides a business responsibility guarantee for the services provided. It generally also provides a number of advantages for the transportation logistics and security of cargo during transit. Typically, bonding is performed by the Canada Border Service Agency. While the best practice is the use of an officially bonded transportation company, a pre-approval process can also be used in lieu of this. Pre-approval is performed by the person commissioning transport services at the retail or distribution site. It is intended to validate the services to be provided in order to establish the same level of trust as a bonded company and minimize security risks to the retail site.</i></p> <p><i>The process must include a review of past references, certifications and licensing. The transportation company must be made aware of the product, its security sensitivities, and ensure that the company is committed to operate under the security requirements during transport set out by the CAN Security Code. In the case of a larger company, the pre-approval must extend to the drivers that will be actually be carrying out the transportation services.</i></p>
A2 f)	Providing Transportation From Source Via Rail/Truck – Transport Company Security Requirements	Clarification requested on what transportation companies must keep records on.	The transport company will: [...] f) Retain records for a minimum of 2 years.	<p>No changes.</p> <p><i>Explanation:</i> <i>The CAN Code Implementation Guide is a companion document which provides additional guidance and clarification on the requirements under the CAN Security Code. Section A2 of the Implementation Guide states that records kept by a transportation company can be the Bill of Lading or other combination of documents containing, at a minimum, the following information:</i></p> <ul style="list-style-type: none"> <i>• Product Shipped</i> <i>• Date of Shipment</i> <i>• Load Quantity</i> <i>• Point of Origin of Shipped Product</i> <i>• Location of Destination</i> <i>• Applicable Signatures of Shipper, Transport and Receiver</i>

Section	Description	Item	Current Language	Final Amendment Language
				<i>Maintaining a record trail is an essential component of any plan for the treatment of security-sensitive products.</i>
A3 a)	Access to Product During Shipment:	Clarification requested on what constitutes “properly locked down” and the use of tarp covers on trucks.	Truck shipments of CAN cannot be left unattended by the driver at any time unless the load is parked in a secured area or the unit/load is properly locked down (i.e. high security padlocks, fifth wheel locks, etc.)	No changes. <u>Explanation:</u> <i>The CAN Code Implementation Guide is a companion document which provides additional guidance and clarification on the requirements under the CAN Security Code. For Section A3, properly locked down refers to measures taken to ensure that access to a load of CAN is prohibited in the event of a stop during transit. If a vehicle cannot be stored in a secure area, the vehicle and access points to the CAN load must be locked using items such as high security padlocks, fifth wheel locks and other measures to prevent theft of the vehicle and/or product. A tarp cover, so long as it is locked and secured, will meet this requirement. An inspection of the load and locks/seals must be conducted for theft and/or tampering after every stop and upon arrival at its intended destination. It is a recommended best practice for shipments of CAN by non-stop if possible.</i>
A3 b) & c)	Access to Product During Shipment	Clarification to harmonize with existing regulatory requirements.	b) Hatches on trucks and railcars must be secured and sealed with security cables. c) Seals are to be inspected and validated after each stop and upon arrival at the destination. All tampering of seals must be investigated, documented and any losses reported.	b) Hatches on trucks and railcars must be secured with locks or sealed with a security cable. c) Locks, and/or seals if they are present, are to be inspected and validated after each stop and upon arrival at the destination. All tampering of locks or seals must be investigated, documented and any losses reported. <u>Rationale:</u> <i>This practice is based off of the requirements for AN under the <u>Explosives Regulations, 2013</u> which only require locking or sealing all access points on transportation vehicles during transit – not both. Changes have been made to ensure consistency with these practices.</i>
A3 b) & c) – IG			Securing of Hatches on Trucks and Railcars – All access hatches and gates on trucks and railcars transporting CAN must be secured and sealed. The recommended best practice for seals is a cable type seal.	Securing of Hatches on Trucks and Railcars – All access points (e.g. hatches or gates) on trucks and railcars transporting CAN must be secured with a lock or sealed with a security cable regardless of distance travelled. Inspection of Locks/Seals – All locks/seals installed on the

Section	Description	Item	Current Language	Final Amendment Language
			<p>Inspection of Seals – Seals installed on the access hatches and gates are to be inspected and validated after each stop and upon arrival at the 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.</p>	<p>access hatches and gates are to be inspected and validated after each stop and upon arrival at the destination. The inspection at the 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.</p> <p><u>Rationale:</u> <i>This practice is based off of the requirements for AN under the Explosives Regulations,2013 which only require locking or sealing all access points on transportation vehicles during transit – not both. Changes have been made to ensure consistency with these practices.</i></p>
A4 a)	Loss or Tampering of Product During Shipment	Clarification requested on the weighing of product loads. Weigh scales can sometimes see a 1-2% difference in the measured weight. How do you compensate for this?	a) Verify quantities for all shipments of bulk CAN against shipped quantities where possible. Shortages in excess of historical norms should be investigated, documented and reported.	<p>No changes.</p> <p><u>Explanation:</u> <i>The CAN Code Implementation Guide is a companion document which provides additional guidance and clarification on the requirements under the CAN Security Code. For Section A4, a process must be in place which helps prevent theft and/or tampering but also sets out steps to take in the event that theft or tampering may occur. Part of this process involves monitoring for losses that are not normal for a site in their day-to-day and shipment operations which may indicate that theft/tampering has occurred.</i></p> <p><i>Transactions are generally based on origin weight. If possible, it is highly recommended that the actual weight of CAN delivered be determined against shipped quantities to determine if there are any shortages upon arrival to the facility. However, if determining an actual weight is not possible, a visual inspection looking for empty or short compartments in the load will meet this requirement. All shortages must be documented if in excess of historical norms. Usually a 1% loss is expected along the fertilizer industry supply chain. The bottom line is to look for shortages that are not normal for the given operation. This protocol, in combination with inspections for tampering and process for documenting and reporting losses to the seller/supplier form a process for assessing losses or tampering during transportation consistent with good security practices.</i></p>

Section	Description	Item	Current Language	Final Amendment Language
A4 b) – IG	Loss or Tampering of Product During Shipment	Clarification to harmonize with existing regulatory requirements.	Tampering of Seals – Upon arrival at destination, all tampering of seals noticed during shipment or upon arrival must be documented and reported to the seller.	Tampering of Locks/Seals – Upon arrival at destination, all tampering of locks/seals noticed during shipment or upon arrival must be documented and reported to the seller. Rationale: <i>This practice is based off of the requirements for AN under the <u>Explosives Regulations, 2013</u> which only require locking or sealing all access points on transportation vehicles during transit – not both. Changes have been made to ensure consistency with these practices.</i>
B1 a)	Storage of CAN – Product Storage Security	Clarification requested on the use of tarps to secure buildings.	a) All bin gates providing access to storage bins containing CAN are locked and secured. Where possible, it is a recommended best practice to provide perimeter security. This may include fencing with lockage gates or other means of perimeter security around bins and/or buildings storing CAN.	No changes. Explanation: <i>A tarp across the entrance to a bin which is not contained within a larger lockable structure such as a warehouse is not a sufficient method of securing a CAN storage bin. CAN must be stored within a storage structure whose doors, windows or other points of entry can be locked to form a secured storage area.</i>
B1 a)	Storage of CAN – Product Storage Security	Clarification requested on what constitutes perimeter security.	a) All bin gates providing access to storage bins containing CAN are locked and secured. Where possible, it is a recommended best practice to provide perimeter security. This may include fencing with lockage gates or other means of perimeter security around bins and/or buildings storing CAN.	No changes. Explanation: <i>The CAN Code Implementation Guide is a companion document which provides additional guidance and clarification on the requirements under the CAN Security Code. For Section B1, perimeter security is a physical barrier that keeps trespassers off the site premises. Most examples will come in the form of fencing with lockable gates surrounding the bins or buildings containing CAN. The recommended standard for fencing is a 2-meter chain link fence complete with lockable gates and 3-strand barb wire barricade at the top of the fence. However, other means of perimeter security that functions to prevent unauthorized access to stored CAN in an equivalent manner would also be acceptable. <i>Perimeter security is a suggested best practice for security but is not mandatory.</i></i>
B1 b)	Storage of CAN – Product Storage Security	Clarification requested on high security locks. Are locks required for windows or does high security mean measures	b) All doors, windows and other points of access to buildings storing bagged or bulk CAN are secured with a high security lock.	No changes. Rationale: <i>Language to be added to the CAN Security Code Implementation</i>

Section	Description	Item	Current Language	Final Amendment Language
		such as bars on windows?		<i>Guide (see below).</i>
B1 b) – IG	Implementation Guide: Storage of CAN – Product Storage Security		Access Points on Buildings – All doors, windows and other points of access to buildings storing bagged or bulk CAN are secured with a high quality lock. It is recommended that the locking device be designed to be resistant to bolt cutters.	Access Points on Buildings – All doors and other points of access to buildings storing bagged or bulk CAN are secured with a high quality lock. Windows must also be secured using a high quality lock, internal locking mechanism, bars on the window or other mechanism designed to prevent unauthorized access. It is recommended that the locking device be designed to be resistant to bolt cutters. <u>Rationale:</u> <i>In addition to doors and other access points into a building storing CAN, any windows must also be locked. This can be in the form of a high security lock (resistant to bolt cutters), internal locking mechanism on the window, bars on the window or other system designed to prevent a trespasser from gaining access to the product storage area through a window. Language has been added to the CAN Security Code Implementation Guide to provide additional clarification.</i>
B3	Access by Onsite Personnel	Clarification requested on security measures for hiring practices: a) Whether disclosure of a criminal record prohibits the ability to hire that person; and b) How to avoid discrimination when hiring a person with a criminal record and complying with human rights and employment law.	a) All employees working at the CAN storage facility for a period of 5 years or less to provide valid past work references. b) All new hires to provide valid past work references and disclose previous criminal charges.	a) All employees working at the CAN storage facility for a period of 5 years or less to provide valid work references. b) All new hires to provide valid past work references and disclose any previous criminal convictions. <u>Rationale:</u> <i>In general, it is not discriminatory to make hiring or other employment law decisions based on a record of criminal offenses unless the offence(s) have been pardoned or the offence is a summary offence. The CAN Security Code has been clarified that this is in reference to a scenario where a person has been found guilty of an offence (i.e. convicted).</i> <i>The disclosure of past criminal convictions is not intended to dictate hiring decisions but to ensure there is a screening process in place for a retail site to assess and be aware of their security risks including those posed by prospective employees.</i>
B3 c)	Access by Onsite Personnel	Clarification requested on the relevance of the past work history of a contractor, as well	c) All contractors to provide documentation indicating past work history.	No changes. <u>Rationale:</u>

Section	Description	Item	Current Language	Final Amendment Language
		as the time period and record sufficient to meet this requirement.		<i>Language to be added to the CAN Security Code Implementation Guide (see below).</i>
B3 c) – IG	Implementation Guide: Access by Onsite Personnel		Past Work References for Contractors – All contractors must provide documentation indicating past work history. This is not required if the contractor has established a work history with the facility for a period equal to or greater than five years.	<p>Past Work References for Contractors – All contractors must provide documentation indicating past work history. If possible work history for the past 5 years should be obtained; however, this may not exist for all contractors. This is not required if the contractor has established a work history with the facility for a period equal to or greater than 5 years.</p> <p><u>Rationale:</u> <i>It is a best practice to receive work history for the past 5 years, however it is also recognized that this may not exist for all contractors. What is important is to have a process in place to ensure that all employees, including contractors, at the CAN storage facility have been screened to prevent possible security risks. Screening past work history and work references can help validate the services that a person is contracted to provide. All contractors must provide documentation (e.g. resume, proposal to an RFP, etc.) to indicate past work history. However, the screening process should not infringe on an individual's personal rights and freedoms. Therefore, it is a good practice to ensure authorization is received from that individual prior to any review of their past references.</i></p>
C1.1 a)	Providing Transportation From Source Via Rail/Truck – Transport Company Security Requirements	Clarity requested on bonding or pre-approval of a transportation company.	The transportation company will: a) Be bonded or pre-approved.	No changes. <u>Rationale:</u> <i>Language to be added to the CAN Security Code Implementation Guide (see below).</i>
C1.1 a) – IG			Bonding or Pre-approval – The transportation firm has either been bonded or has been pre-approved. A record must be available from the company responsible for the shipment 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.	Bonding or Pre-approval – Bonding or pre-approval of the transportation company through internal review is intended to validate the driver(s) and services to be provided and minimize security risks to the retail site when shipping a security-sensitive product. A record must be available from the company responsible for the shipment indicating that the transportation firm has been bonded or pre-approved by internal review. The pre-approval process must include a review of past references, licensing and any necessary certifications.

Section	Description	Item	Current Language	Final Amendment Language
				<p>Rationale: <i>Bonding of a person or transportation company provides a business responsibility guarantee for the services provided. It generally also provides a number of advantages for the transportation logistics and security of cargo during transit. Typically, bonding is performed by the Canada Border Service Agency. While the best practice is the use of an officially bonded transportation company, a pre-approval process can also be used in lieu of this. Pre-approval is performed by the person commissioning transport services at the retail or distribution site. It is intended to validate the services to be provided in order to establish the same level of trust as a bonded company and minimize security risks to the retail site.</i></p> <p><i>The process must include a review of past references, certifications and licensing. The transportation company must be made aware of the product, its security sensitivities, and ensure that the company is committed to operate under the security requirements during transport set out by the CAN Security Code. In the case of a larger company, the pre-approval must extend to the drivers that will be actually be carrying out the transportation services.</i></p>
C1.2	Outbound Transportation – Delivery Receipt Acknowledgement	A concern was raised regarding the practicality of the requirement to obtain a signature from the farmer upon delivery which can be challenging, particularly during rush periods, when the delivery is made straight to the field.	A facility has a written policy in place to confirm, manually or electronically, that the product has been delivered, in full quantity, to the shipment destination and the receiver acknowledges receipt of and responsibility for the product.	<p>No changes.</p> <p>Explanation: <i>A signature indicating that the CAN delivery has been received at its intended final destination must be obtained.</i></p>
C2 c), d) & e)	Access to Product During Shipment	Clarification to harmonize with existing regulatory requirements.	<p>c) Hatches on trucks and railcars must be secured and sealed with security cables.</p> <p>d) Seals are to be inspected and validated after each stop and upon arrival at the destination.</p> <p>e) All tampering of seals must be investigated, documented and any losses reported.</p>	<p>c) Hatches on trucks and railcars must be secured with locks or sealed with a security cable.</p> <p>d) Locks, and/or seals if they are present, are to be inspected and validated after each stop and upon arrival at the destination.</p> <p>e) All tampering of locks or seals must be investigated, documented and any losses reported.</p>

Section	Description	Item	Current Language	Final Amendment Language
				<p><u>Rationale:</u> <i>This practice is based off of the requirements for AN under the <u>Explosives Regulations,2013</u> which only require locking or sealing all access points on transportation vehicles during transit – not both. Changes have been made to ensure consistency with these practices.</i></p>
C2 c), d) & e) – IG			<p>Securing of Hatches on Trucks and Railcars – All access hatches and gates on trucks and railcars transporting CAN must be secured and sealed. The recommended best practice for seals is a cable type seal.</p> <p>Inspection of Seals – Seals installed on the access hatches and gates are to be inspected and validated after each stop and upon arrival at the 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.</p>	<p>Securing of Hatches on Trucks and Railcars – All access points (e.g. hatches or gates) on trucks and railcars transporting CAN must be secured with a lock or sealed with a security cable regardless of distance travelled.</p> <p>Inspection of Locks/Seals – All locks/seals installed on the access hatches and gates are to be inspected and validated after each stop and upon arrival at the 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.</p> <p><u>Rationale:</u> <i>This practice is based off of the requirements for AN under the <u>Explosives Regulations,2013</u> which only require locking or sealing all access points on transportation vehicles during transit – not both. Changes have been made to ensure consistency with these practices.</i></p>
C2	Access to Product During Shipment	<p>A number of clarifications were requested including:</p> <p>a) Applicability of these requirements to blends where the AN content is over 60% by weight</p> <p>b) The use of tarp covers to secure trucks</p> <p>c) The requirement for a rear gate to be closed on a spreader which would potentially create issues due</p>	<p>The facility has provided written notice to all drivers that:</p> <p>a) A process must be in place to verify arrival of a shipment at the intended destination.</p> <p>b) Truck shipments of CAN cannot be left unattended by the driver at any time unless the load is parked in a secured area or the unit/load is properly locked down (e.g. high security padlocks, fifth wheel locks).</p> <p>c) Hatches on trucks and railcars must be secured and sealed with security cables.</p>	<p>No changes.</p> <p><u>Rationale:</u> <i>The definition of CAN and its application to products has been revised – please see the row outlining changes to the Preface of the CAN Security Code for final language amendments.</i></p> <p><i>Blends which are above the minimum AN content would be captured. However, it is recognized that CAN may be blended prior to delivery with other products for specific farm nutrient requirements. The intent of the CAN Security Code is to apply security requirements on CAN or blends which still have a high content of CAN which will be used for agriculture. In light of this, the definition has been amended to clarify the scope of products captured</i></p>

Section	Description	Item	Current Language	Final Amendment Language
		to equipment limitations (e.g. gate closing and adjustment)	<p>d) Seals are to be inspected and validated after each stop and upon arrival at the destination.</p> <p>e) All tampering of seals must be investigated and documented, and any losses reported to the appropriate authorities</p> <p>f) If the vehicle used to transport the CAN from the retail facility to the end-use point includes dispensing equipment (i.e. spreader with auger), all dispensing parts must be secured in the closed position to ensure total product containment during transport.</p> <p>g) The driver must notify the seller in the event of a spill or other incident which could impact the total quantity delivered to the receiver.</p> <p>h) If a driver discovers that any 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, who in turn must immediately inform the local police.</p>	<p><i>The CAN Code Implementation Guide is a companion document which provides additional guidance and clarification on the requirements under the CAN Security Code. For Section C2, if a vehicle cannot be stored in a secure area, the vehicle and access points to the CAN load must be locked using items such as high security padlocks, fifth wheel locks and other measures to prevent theft of the vehicle and/or product. A tarp cover, so long as it is locked and secured, will meet this requirement. An inspection of the load and seals must be conducted for theft and/or tampering after every stop and upon arrival at its intended destination. It is a recommended best practice for shipments of CAN by non-stop if possible.</i></p> <p><i>Any vehicle which is being used to transport product should ensure that product is contained during transit, including specialized farm equipment which is sometimes used to transport product short distances. In the event that specialized equipment is used to transport product from retail to farm, any dispensing parts should be double checked to confirm that they are closed. It is recognized that there may be challenges with equipment adjustments however it must be made sure that product will remain contained during transport and not accidentally dispensed prematurely onto roadways.</i></p>
C2 b)	Access to Product During Shipment	Clarification requested on what constitutes “properly locked down”.	Truck shipments of CAN cannot be left unattended by the driver at any time unless the load is parked in a secured area or the unit/load is properly locked down (i.e. high security padlocks, fifth wheel locks, etc.).	<p>No changes.</p> <p><u>Explanation:</u> <i>The CAN Code Implementation Guide is a companion document which provides additional guidance and clarification on the requirements under the CAN Security Code. For Section C2, properly locked down refers to measures taken to ensure that access to a load of CAN is prohibited in the event of a stop during transit. If a vehicle cannot be stored in a secure area, the vehicle and access points to the CAN load must be locked using items such as high security padlocks, fifth wheel locks and other measures to prevent theft of the vehicle and/or product. A tarp cover, so long as it is locked and secured, will meet this requirement. An inspection of the load and seals must be conducted for theft and/or tampering after every stop and upon arrival at its intended destination. It is a recommended best practice for shipments of CAN by non-stop if possible.</i></p>

Section	Description	Item	Current Language	Final Amendment Language
C5.2 f)	Communication of End-Users Storage Safety and Security	Clarification request on what constitutes a combustible material and whether storage in a wooden structure is allowed for an end-user.	f) CAN must not be stored near any combustible material including internal combustion equipment.	<p>f) CAN must be protected from contamination by incompatible materials. Therefore, CAN must not be stored near materials such as fuels, oil, grease, sawdust, seed, grain or any other organic and/or combustible materials which could become mixed with the stored fertilizer. This includes storing near internal combustion equipment. Please consult your provincial building, electrical and fire codes for storage area construction requirements.</p> <p><i>Rationale:</i> <i>Section C5 refers to information to be provided by a retailer to their customers upon their purchase of CAN. Although it is preferred that a farmer does not store CAN on their farm, in the event that this is unavoidable it is important to ensure that they are educated on safe and secure storage and handling practices for CAN. A sample handout will be made available in the CAN Security Code Appendices or alternatively, the Fertilizer Canada CAN Information Brochure (release pending) can be used by distribution and retail facilities to meet this requirement.</i></p> <p><i>CAN must be protected against contamination by combustible materials. While storage in a wooden structure may be allowed for end-users who are storing small amounts of product, storage area construction requirements will be decided by local building requirements. A farmer who is considering storing CAN on their farm should consult their provincial building, electrical and fire codes and their associated authorities if they have questions regarding the suitability of their storage facilities for storage of CAN.</i></p>
C5.2 g)	Communication of End-Users Storage Safety and Security	Clarification request on what constitutes a fire suppression system for an end-user.	g) A fire suppression system containing sufficient amounts of water must be available.	<p>g) Only water should ever be used for fires involving CAN and a fire suppression system containing sufficient amounts of water must be available in the vicinity of any area being used to store CAN. Chemical fire extinguishers, foam, or attempts to smother the fire with sand should not be used. Serious fire conditions should be left to your local fire department.</p> <p>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.</p>

Section	Description	Item	Current Language	Final Amendment Language
				<p><i>Rationale:</i> <i>Section C5 refers to information to be provided by a retailer to their customers upon their purchase of CAN. Although it is preferred that a farmer does not store CAN on their farm, in the event that this is unavoidable it is important to ensure that they are educated on safe and secure storage and handling practices for CAN. A sample handout will be made available in the CAN Security Code Appendices or alternatively, the Fertilizer Canada CAN Information Brochure (release pending) can be used by distribution and retail facilities to meet this requirement.</i></p> <p><i>For CAN, a fire suppression system will consist of water in sufficient amounts and in the vicinity of the CAN storage area for quick access. Serious fire conditions should be left to your local fire departments. While storage of small amounts of CAN are allowed, larger amounts increase security risks and may trigger other requirements under federal, provincial and/or municipal regulations. Therefore, it is recommended that only the amount of product that is needed be purchased to avoid on-farm storage.</i></p>