

Agricultural Calcium Ammonium Nitrate Security Code of Practice – Technical Amendments & Audit Clarifications [MAY 2018]

Section	Description	Item	Current Language	Final Amendment Language
A1.1	Inbound Shipments By Marine	Clarification on the regulatory definition of “ammonium nitrate-based fertilizer”	d. Notify the Marine Safety Office of Transport Canada nearest to the location of unloading; as well as the harbour master at least 24 hours before 150 tonnes or more of AN-based fertilizer is to be unloaded.	<p>d. Notify the Marine Safety Office of Transport Canada nearest to the location of unloading; as well as the harbour master at least 24 hours before 150 tonnes or more of AN-based fertilizer* is to be unloaded.</p> <p>*AN-based fertilizer refers to any AN-containing fertilizer product. Further information on the products covered can be found in the International Maritime Solid Bulk Cargoes (IMSBC) Code.</p> <p>Explanation: The <u>Cargo, Fumigation and Tackle Regulations</u> require that the Marine Safety Office of Transport Canada be notified prior to the unloading of 150 tonnes or more AN-based fertilizer is unloaded. Under these Regulations, AN-fertilizer is defined as any fertilizer product containing AN as per the International Maritime Solid Bulk Cargoes (IMSBC) Code.</p>
A1.2	Inbound Shipments By Rail/Trucks	Option for a responsible person	c. Attend to the unloading of the shipment at all times.	<p>c. Attend or assure a responsible person attends to the unloading of the shipment at all times.</p> <p>Explanation: Option to allow a responsible person to be designated to oversee shipment unloading is allowed when shipping by marine under Section A1.1. Language added to allow for the equivalent option when shipping by road or rail.</p>
A1.2 – IG			None.	Responsible Representative – A responsible person designated by the importer/receiver should be available during unloading of the product to oversee its discharge. For example, this could be a bonded or pre-approved driver as part of their security responsibilities during transport.
A4	Loss or Tampering of Product During Shipment	Clarification that all quantities of CAN must be verified	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>a. Verify quantities for all shipments of CAN against shipped quantities where possible. Shortages in excess of historical norms should be investigated, documented and reported.</p> <p>Explanation: Quantity verification must be performed for both bulk and bagged CAN shipments.</p>
B1	Product Storage Security	Change in security inspection frequency to a monthly basis	Weekly inspections must be conducted in order to verify adherence to these requirements. Records of all inspections must be kept.	<p>No changes.</p> <p>Explanation: The requirements of the <u>Explosive Regulations, 2013</u> which are expected to become applicable to CAN require</p>

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				<p><i>weekly inspections of the product to check for theft or tampering. The other inspections under the CAN Security Code are harmonized to this inspection frequency as they are an important part of this process and greatly contribute to the detection of any unauthorized access to the facility and storage areas.</i></p>
B1 – IG	Product Storage Security	Guidance on key control plans and update frequency	None.	<p>The key control system must be kept up to date. A facility's system should be updated whenever there is a change in personnel or any other change at the facility which impacts the key control plan contents or the security of the product. Assigning a dedicated person to review the plan on a regular basis and update it with any new changes can be an easy way to ensure this.</p> <p>Natural Resources Canada (NRCan) provides guidance on how a key control system can be integrated into a facility's security plan (See B2 SECURITY PLAN) to help keep all implemented security procedures in the same place for easy reference. Guidance on creating security and key control plans can be accessed using the links below:</p> <p>NRCan Guidance on Security Plans: http://www.nrcan.gc.ca/explosives/acts-regulations/13971</p> <p>NRCan Guidance on Key Control Plans: http://www.nrcan.gc.ca/explosives/resources/guidelines/13961</p> <p><u>Explanation:</u> <i>The security requirements for CAN are based off of those listed for AN under the <u>Explosives Regulations, 2013</u> which includes a key control plan. While there is no formal deadline for updating a site's key control plan, it is expected that the plan will be updated whenever a change at the facility occurs that will have an impact, to ensure that security is maintained. Further guidance on developing a key control plan as well as security plans can be found on Natural Resource Canada's website via the links above.</i></p>
B1 – IG	Product Storage Security	Guidance on visitor reporting	None.	<p>Visitor Reporting – A process must be in place to ensure management and/or security personnel have an awareness of all on-site persons who are not regular staff for that location (e.g. guests, contractors, etc.) and are given authorization before gaining access to the facility grounds. This could include measures such as signs directing visitors to sign in at the main office structure or other location and guest sign-in/sign-out sheets.</p>

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				<p><u>Explanation:</u> A reporting process for visitors and contractors prior to receiving access to a facility is an essential practice as part of any facility's operating and security procedures. This can be as simple as a log in sheet for guest sign in at the front desk. The Implementation Guide is designed to give further information on the requirements of the CAN Security Code. Additional language has been added to the Implementation Guide to help clarify options for meeting requirements B1 h) in the CAN Security Code.</p>
B2	Security Plan	Clarification of "first responder agencies"	e. Communicated in writing to local law enforcement and first responder agencies informing them of the presence of CAN at the storage facility.	e. Communicated in writing to local law enforcement and fire department informing them of the presence of CAN at the storage facility. <p><u>Explanation:</u> As the focus of a security plan is security-related incidents such as procedures in place to prevent unauthorized access and theft, clarification has been provided on the scope of local authorities who should be informed of the presence of CAN.</p>
C1.2	Delivery Receipt Acknowledgement	Clarification on signature obtained	A facility has a written procedure in place to confirm, manually or electronically, that the product has been delivered, in full quantity, to the shipment destination and the receiver acknowledges the receipt and responsibility of the product.	No changes. <p><u>Explanation:</u> Language changes have been made to the Implementation Guide and a new documentation template has been added to the Appendices to provide additional clarity and guidance on meeting this protocol.</p>
C1.2 – IG			The seller must obtain acknowledgement (manually or electronically) from the buyer that the shipment has been delivered to its intended destination as per the agreed upon terms. Documentation of delivery receipt should be kept on file along with sales records and available for verification during the audit. A dated and signed delivery invoice could be sufficient as a documented delivery receipt.	The seller must obtain acknowledgement (manually or electronically) from the buyer that the shipment has been delivered to its intended destination as per the agreed upon terms. As per industry best practice, the preferred option for this is a dated and signed delivery invoice by the customer (grower) upon delivery of the product to its intended destination. However it is understood that on some occasions, particularly during the busy planting season, that the grower may be unavailable to sign for delivery. In this case, the delivery driver may sign to confirm delivery if the customer provides written acknowledgement of the following: a) The customer provides explicit delivery instructions (for each delivery) to the retailer at sale or prior to delivery; b) The customer provides permission to the delivery driver to sign on their behalf to confirm delivery as per the provided delivery instructions which is renewed at least annually;

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C1.2 – APP				<p>c) The customer acknowledges their responsibility for the security of the product; and</p> <p>d) The customer confirms that they have reviewed and understood provided documentation on the safety and security of the product (as per Section C5)</p> <p>Documentation of driver delivery signing permission, delivery instructions (for each applicable delivery), and receipt should be kept on file along with sales records and available for verification during the audit. An example acknowledgement form can be found in the associated section for C1.2 of the Appendices for the CAN Security Code.</p> <p><i>Explanation:</i> A documented chain of custody is an essential component for managing a security-sensitive product during its transportation throughout the supply chain. Upon delivery to a customer, the most common and best practice to maintain this procedure is to obtain a signature from the customer to confirm delivery. However it is recognized that in some cases, especially during the busy season, a grower may not be available to provide a signature. In this case, the delivery driver is able to sign to confirm drop-off, so long as the grower has provided their permission for the driver to do so prior to the date of delivery and has given detailed instructions to their retailer (prior to the date of delivery) on where to deliver the product.</p>
			None.	Added guidance template for a driver delivery sign-off acknowledgement form.
C3	Validation of Customers	Changes to valid identification documents options	<p>a. Customer identification such as validation of a customer purchasing CAN through the provision of one of the following pieces of proper identification:</p> <ul style="list-style-type: none"> i. Pesticide licence ii. Government-issued photo identification iii. Two pieces of identification; both with buyer's name, at least one government-issued and at least one with the buyer's address iv. Producteur Agricole number v. Canadian Wheat Board Identification Number 	<p>a. Customer identification such as validation of a customer purchasing CAN through the provision of one of the following pieces of proper identification:</p> <ul style="list-style-type: none"> i. Pesticide licence ii. Government-issued photo identification iii. Two pieces of identification; both with buyer's name, at least one government-issued and at least one with the buyer's address iv. Producteur Agricole number v. Ontario Federation of Agriculture number vi. Proof of registration under the <i>Controlled Goods Regulations</i> vii. Proof of the purchaser's enrolment on the component sellers list (if the purchaser is a re-

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			vi. Ontario Federation of Agriculture number vii. Proof of registration under the <i>Controlled Goods Regulations</i> viii. Proof of the purchaser's enrolment on the component sellers list (if the purchaser is a re-seller)	<p>seller)</p> <p><i>Explanation:</i> <i>The program to which this type of identification belongs no longer exists.</i></p>
C4	Traceability of Sales Records	Clarification of documentation requirements	<p>Purchase records of all sales of CAN must be kept for a period of two years. At a minimum, this should include:</p> <ul style="list-style-type: none"> a. Customer's name b. Customer's address or legal land description c. Customer's telephone number d. Identification: type of document verified and reference number (if applicable) e. Quantity of CAN purchased (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 	<p>Purchase records of all sales of CAN must be kept for a period of two years. At a minimum, this should include:</p> <ul style="list-style-type: none"> a. Customer's name b. Customer's address or legal land description c. Customer's telephone number d. Identification: type of document verified and reference number e. Trade name and quantity of CAN purchased f. An indication if purchased in bags or bulk and if applicable, the package size (weight or volume) of bagged CAN 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 <p><i>Explanation:</i> <i>Language amended to more closely follow the language under the <u>Explosives Regulations, 2013</u> and clarify documentation requirements for this section.</i></p>
C5	Criteria Specific to End-Users	Requirements clarification	None.	<p>NOTE: The Fertilizer Canada Calcium Ammonium Nitrate Safety and Security Information brochure is a compilation of the information required within Section C5 and can be used by Distribution and/or Retail facilities to meet the requirements of this section. The brochure can be found on the Fertilizer Canada website at www.fertilizercanada.ca. Large quantity customers need only receive the information brochure while small quantity customers (less than 500kg) must receive the information and have a review of the information documented.</p> <p><i>Explanation:</i> <i>Note clarifying that the Fertilizer Canada CAN</i></p>

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				<p><i>Safety and Security Brochure can be used for all information to be provided to a customer as required by Section C5. In addition, further clarification on the requirements differences for large quantity customers versus small quantity customers.</i></p>
C5.4	Small Quantity Purchasers Information	Clarification of the small quantity threshold and requirements	<p>* The Calcium Ammonium Nitrate Safety and Security Information brochure provided by Fertilizer Canada must be reviewed prior to purchase by customers that purchase less than 500kg of product within one growing season. Customers that require less than 500kg in one transaction but have purchased a minimum of 500kg of product within the same growing season do not fall under this requirement.</p> <p><i>Retailers will demonstrate compliance with this section by retaining copies of acknowledgement forms signed by customers and confirming the customer has reviewed and understood the information provided, along with copies of the respective sales receipt or purchase order associated with the small-quantity sale.</i></p>	<p>* The Calcium Ammonium Nitrate Safety and Security Information brochure provided by Fertilizer Canada must be reviewed prior to purchase by customers that purchase less than 500kg of product within one growing season. Customers that require less than 500kg in one transaction but have purchased a minimum of 500kg of product within the same growing season do not fall under this requirement.</p> <p>Compliance with this section will be indicated through the presence of written guidelines and procedures for customer communication and the presence of a written handout provided to all end-users. Copies of acknowledgement forms signed by customers and confirming the customer has reviewed and understood the information provided must be retained, along with copies of the respective sales receipt or purchase order associated with the small-quantity sale. The auditor may spot check records to verify procedures are being implemented.</p> <p><u>Explanation:</u> Additional language provided to qualify the amount of product which is considered a small quantity to trigger the requirements of this section. In addition, further language has been provided to clarify the expectations of this section which includes customer sign-off on an acknowledgement form in addition to the receipt of information on CAN safety and security.</p> <p>The Fertilizer Canada CAN Safety and Security brochure can be provided by the retail facility to meet the information requirements of this section. Further resources for the requirements of Section C5.4 can be found in the companion Appendices document. Both can be found on the Fertilizer Canada website under the CAN Security Code tab.</p>
D1	Training	Clarification of renewal frequency	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. At a minimum Site and/or Operation Managers are required to have	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.

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			successfully completed the course, renewed annually.	<u>Explanation:</u> Language explaining the training requirement under Section D1 amended to clarify that training must be renewed annually.