



FERTILIZER CANADA

FERTILISANTS CANADA

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June 1, 2018

To: ALL FERTILIZER CANADA MEMBERS & STAKEHOLDERS

RE: 45-Day Comment Period for the Ammonia Code of Practice Proposed Site Security Amendment

Fertilizer Canada's Ammonia Code of Practice (Code) was first implemented in 2009 and provided a standardized approach to the safe and secure storage, handling and transportation of agricultural anhydrous ammonia. The Code was later revised in 2012, then in 2017 to incorporate the feedback of the first audit cycle and to address some of the challenges in compliance. Fertilizer Canada aims to revise the Code every 5 years in order to address concerns raised and to maintain its world-class status.

Next Revision

The Fertilizer Safety and Security Council's Ammonia Code Working Group has been actively reviewing the Code to ensure that it continues to reflect best practices. In more recent discussions, there have been some concerns raised regarding the consistent implementation of site security means to prevent unauthorized access to the stored anhydrous ammonia. The next revision publication is scheduled for January 2022.

Proposed Amendments to the Ammonia Code of Practice Security for Anhydrous Ammonia Storage and Handling Operations

Protocol A4.1 outlines a number of acceptable measures to prevent the unauthorized access to anhydrous ammonia while in retail storage. The proposed amendment would require the mandatory installation and use of fencing measures and forgoing the options of valve and tank securement or other physical means of security. All newly construction sites after January 1, 2019 must include fencing while currently certified sites must install fencing by January 1, 2021.

The complete proposed language can be found in the attached document. The document provides additional explanation as to the support for the proposal as well as a reference to the Code's original language for easy comparison.

As a Fertilizer Canada member and/or stakeholder, your feedback is important to us. Fertilizer Canada is committed to providing a robust Code and will continue to work with the fertilizer industry to maintain our social license to operate, keeping employees, farmers and the public safe.

All comments must be submitted in writing on or before **July 15, 2018** and should be submitted to:

Giulia Brutesco
Senior Director, Industry Standards
Fertilizer Canada
350 Sparks St. Suite 907, Ottawa, Ontario, K1R 7S8



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All comments received will be reviewed and incorporated as appropriate. We will make the greatest effort to reach out to all respondents to address all comments and questions.

Implementation

This protocol is intended to be implemented prior to the next revision of the Code with a target implementation date of September 1, 2018.

We look forward to hearing from you. Thank you.

Giulia Brutesco
Senior Director, Industry Standards
Fertilizer Canada