



FERTILIZER CANADA

FERTILISANTS CANADA

APPENDICES

Agricultural Calcium Ammonium Nitrate Security Code of Practice

JANUARY 2019

**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]

January 28, 2019

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.

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

NOTE: The template is an example only with the purpose of assisting responsible persons in developing a security plan for their site(s). It may not comprehensively include all scenarios, procedures and/or regulatory requirements for a given facility.

**CALCIUM AMMONIUM NITRATE (CAN)
SECURITY PLAN**

Name of Company

Location

Telephone Number

Manager's Name:

Office Phone Number:

Alternative Phone Number:

For events of theft, tampering, suspicious sale attempts or other security breaches during transportation, storage, handling and sale of calcium ammonium nitrate, phone:

Fire:

Police:

RCMP Hotline: 1-800-420-5805

Last Reviewed: (MONTH, DAY, YEAR)

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1.0 PURPOSE

This section could contain a brief introduction and description of the Security Plan, as well as a description of how it is organized and how it will be used at the site. In addition to this, sites may choose to use this section to list general responsibilities not associated with a specific procedure and assign the responsible person(s) for carrying out those tasks. The Security Plan must be renewed on an annual basis to ensure that the procedures and references persons/job titles are up to date. Also, staff must be trained on the procedures relevant to their roles and responsibilities. The annual review and training may be conducted by a single responsible person or broken up by section and assigned to multiple people as appropriate. An example of what this section could include can be found below.

EXAMPLE:

This Security Plan provides measures implemented to address identified threats to the security of calcium ammonium nitrate (CAN) and instructions for responding to a number of security events. These procedures will be used in training sessions and onboarding of new employees in order to develop and enable employees to act responsibly and appropriately in the event of a security-related incident.

CAN is a security-sensitive product which can be criminally misused for the manufacture of homemade explosives. Security threats concerning CAN at this site and along the supply chain can include:

- Unauthorized access resulting in:
 - Theft
 - Tampering
 - Sabotage
 - Criminal misuse of product
- Purchase for the purpose of criminal misuse of product

The instructions are organized to prioritize information based on need with emergency procedures foremost and everyday business procedures following. It must be reviewed and updated annually. All users of this Security Plan must be thoroughly familiar with their role and responsibilities in upholding a high standard of security in everyday business conditions and in the event of a security incident. Section 3.0 contains emergency procedures which will be enacted should a security breach occur. Sections 4.0 to 6.0 contain measures in place to address identified threats to product security. Section 4.0 describes the measures in place to control access to the site where product is stored and the measures by which authorization to the product storage area(s) is granted. Section 5.0 describes the procedures by which the product stock inventory is managed and secured during shipment to and from the facility as well as during storage

at the site. Section 6.0 includes relevant procedures for validating customers purchasing CAN, the collection and protection of customer information and refusal of sale measures. Lastly, Section 7.0 contains records of key supporting documentation.

Key Tasks and Responsible Persons

The following tasks are assigned to the listed responsible person(s):

Task	Responsible Person(s)
e.g. Annual Update of Security Plan and distribution	
e.g. Training and familiarization of staff and new employees of Security Plan procedures, roles and responsibilities	

Distribution of Security Plan

This Security Plan itself should be treated as a security-sensitive document. The original document and all approved copies of it should be stored in a secure location. Old versions of the Security Plan will be appropriately destroyed by deleting electronic versions and/or shredding physical paper copies. Upon review and update of the Security Plan, the following person(s) are in possession of an approved copy and will be forwarded the revised version:

Copy #	Name	Location	Mailing Address/E-mail
1			
2			
3			

2.0 RISK ASSESSMENT

A risk assessment helps identify the vulnerabilities at a given site which would give rise to an unwanted security breach event. Identifying these scenarios will then assist in the development of appropriate responses to help address them. The number of vulnerabilities and unwanted event scenarios will depend on the size and set up of your site. The following table provides a sample table framework for listing and assessing site security risks, as well as some examples.

EXAMPLE:

Unwanted Security Event	Example of Possible Causes	Potential Consequences	Control Mechanism to Eliminate/Reduce	Actions to Control
Unexplained Losses during Storage	Unauthorized access/theft Product shrink	Criminal misuse Business loss	Locks and monitored security on product storage area After-hours lighting Personnel/visitor authorization procedures Signage Inventory, inspections and record keeping	Reporting procedure to inform local authorities of security breach
Unexplained Losses during Shipping by Truck	Unauthorized access/theft Spill	Criminal misuse Business loss	Locks and/or seals on vehicles Inspection of locks/seals by drivers after stops Inventory measures upon arrival at storage facility Reporting of any spills to site	Reporting procedure to inform the shipper of the product and local authorities of security breach
Wrongful Sale	Lack of customer verification	Criminal misuse	Identification requirements for potential buyers Record keeping of customer and use information Sales procedures to determine customer is a farmer	Reporting procedure to report suspicious purchase attempts

3.0 EMERGENCY PROCEDURES

This section contains the procedures to be followed in order to respond to a security event at the site and the assigned individual(s) or job title of the person responsible for carrying out the emergency procedure(s). Potential scenarios to consider include theft, sabotage, unauthorized access by individuals (e.g. staff, contractors, visitors, outsiders), and unexplained losses. Examples:

3.1 THEFT OR TAMPERING DURING TRANSPORTATION

Describe the steps which would be taken by the site in the event that an incident of theft or tampering during shipping is reported to the site by the truck or rail operator. A copy of the site policies developed for the requirements of Sections A and C of the CAN Security Code could also be included in this section. An example of what this section could include can be found below.

EXAMPLE:

Site Personnel Responsibilities:

List the actions which would need to take place to respond to this situation and the staff or job title which is assigned to carry out the actions in the event an incident is reported. Examples:

Task	Name/Job Title	Contact Information (if applicable)
Responsible for overseeing incident response and ensuring procedures are followed		
Gathers relevant information about the incident from the driver/transportation company upon report such as: <ul style="list-style-type: none"> • Driver contact information • Description of the occurrence • Estimated losses (if applicable) 		
Reports incident to relevant agencies (local police must be notified immediately) and acts as liaison to any follow-up investigation procedures/questions		
Reports incident to corporate, president, and/or other management body		

(If receiving) Informs the seller of the CAN that theft/tampering was discovered		
Liaises with customers on any service delays		
Prepares documentation on incident as part of internal record keeping process		

Procedures

List the procedures that staff and the responsible persons listed above would need to follow to respond to this situation in the event that an incident is reported.

Agency Notification

(List the name/organization and respective telephone numbers that will be notified in the event that theft or tampering during transportation is discovered)

Name/Agency	Number
e.g. local police (immediately)	

3.2 THEFT OR TAMPERING DURING STORAGE

Describe the steps which would be taken by the site in the event that an incident of theft or tampering is discovered in the CAN storage area(s). A copy of the site policies developed for the requirements of Section B of the CAN Security Code could also be included in this section. An example of what this section could include can be found below.

EXAMPLE:

Site Personnel Responsibilities:

List the actions which would need to take place to respond to this situation and the staff or job title which is assigned to carry out the actions in the event an incident is discovered. Examples:

Task	Name/Job Title	Contact Information (if applicable)
Responsible for overseeing incident response and ensuring procedures are followed		
Investigates the suspected incident and gathers relevant information such as: <ul style="list-style-type: none"> • Estimated losses (if applicable) • Description of discovery • Evidence of unauthorized access (if easily noted) 		
Reports incident to relevant agencies (local police must be notified immediately) and acts as liaison to any follow-up investigation procedures/questions		
Reports incident to corporate, president, and/or other management body		
Prepares documentation on incident as part of internal record keeping process		
Coordinates repair of any damaged property/breaches of storage structure		

Procedures

List the procedures that staff and the responsible persons listed above would need to follow to respond to this situation in the event that an incident is reported.

Agency Notification

(List the name/organization and respective telephone numbers that will be notified in the event that theft or tampering during transportation is discovered)

Name/Agency	Number
e.g. local police (immediately)	

3.3 SUSPICIOUS PURCHASE ATTEMPT / REFUSAL OF SALE

Describe the steps which would be taken by the site in the event that an attempted purchase is deemed suspicious and/or the sale of CAN is refused. A copy of the site policies developed for the requirements of Section C of the CAN Security Code could also be included in this section. An example of what this section could include can be found below.

EXAMPLE:

Site Personnel Responsibilities:

List the actions which would need to take place to respond to this situation and the staff or job title which is assigned to carry out the actions in the event an incident is discovered. Examples:

Task	Name/Job Title	Contact Information (if applicable)
Responsible for overseeing incident response and ensuring procedures are followed		
Gathers relevant information such as: <ul style="list-style-type: none"> • Description of purchaser • Description of purchase attempt and efforts to validate customer for legitimacy 		
Reports incident to relevant agencies within 24 hours and acts as liaison to any follow-up investigation procedures/questions		
Reports incident to corporate, president, and/or other management body		
Prepares documentation on incident as part of internal record keeping process		

Procedures

List the procedures that staff and the responsible persons listed above would need to follow to respond to this situation in the event that an incident is reported.

Agency Notification

(List the name/organization and respective telephone numbers that will be notified in the event that theft or tampering during transportation is discovered)

Name/Agency	Number
e.g. local police (within 24 hours)	
RCMP Hotline	

4.0 ACCESS CONTROL

This section describes the procedures in place to control access to the CAN storage area and sales records and prevent unauthorized access. Procedures should address both the management of those who need to be on site (e.g. authorized and unauthorized staff, contractors, authorized visitors, etc.) and those who are trespassing. An example of what this section could include can be found below.

4.1 SITE SECURITY

Describe the security measures which are in place for the site and/or CAN storage area as well as the routine inspection/maintenance procedures that are implemented to keep all security equipment in good working order. In addition, the site rules for staff in maintaining a high level of security should also be described. A copy of protocols developed for Section B of the CAN Security Code and reference templates for record keeping or check lists could also be included. Some sample templates can be found in the CAN Code Appendices. An example of what this section could include can be found below.

EXAMPLE:

Security of the Site Grounds:

Security Measures Implemented:

System	Yes	No	Description/Details
Door Locks			e.g. all entrances to CAN storage area
Signage			e.g. signs against unauthorized access posted at all entrances to CAN storage area
Window Locks			
Security Lighting			

Fencing			
Security System			

Site security measures must be inspected every week to ensure that they are in good physical condition, are operational, and that no breaches have occurred. Signage must be kept in good condition and be legible. The CAN storage area should also be inspected to make sure that all doors and windows are in good structural condition, are unbreached and that locks are still functional.

Task	Responsible Person(s) or Job Title(s)
e.g. Conducting weekly site security inspections	

Site Rules for Staff:

In order to maintain the security of the site, staff should ensure that the following measures are followed:

- All doors, windows or other points of access of building(s) storing CAN are locked when not attended to prevent unauthorized access.
- The security system alarm should be set by the last staff member to leave the site at the end of the day.
- Perimeter security fencing should be closed and locked by the last staff member to leave the site at the end of the day.
- Keys which have been assigned to provide access to the CAN storage area should not be duplicated.
- Keys which have been assigned to provide access to the CAN storage area are the sole responsibility of the person whom they are assigned to – they should not be given to another employee or individual.
- Only persons authorized by the site manager [or other responsible person] can assess the CAN storage area(s). Unauthorized persons, including staff, visitors and contractors, must always be accompanied by an authorized staff member within the CAN storage area(s).

Authorized Employee List
e.g. John Smith

4.2 KEY CONTROL PLAN

A Key Control Plan for keys which provide access to the CAN storage area(s) must be developed, implemented and managed. In this, the availability and ability to duplicate keys must be restricted, and associated procedures to manage this must be in place. The Plan must address the requirements for keys and locks used, how the keys are managed, the persons who are permitted to have keys, and the procedures for lost, stolen or misplaced keys. Keys should only be assigned to those who need it as part of their job function and there should be a procedure in place to retire keys upon end of employment at the site. The procedures developed for Section B1 of the CAN Security Code could also be included. An example of what this section could include can be found below.

EXAMPLE:

OBJECTIVE:

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

KEY CONTROL – SITE PERSONNEL RESPONSIBILITIES:

Task	Responsible Person(s) or Job Title(s)
e.g. Managing the integration of new and the retirement of old keys and locks	
e.g. Assignment and tracking of keys to staff and contractors (if appropriate)	

KEY MANAGEMENT:

Every key which provides access the CAN storage area must be assigned a number that is not its original serial number, which will be tracked. Serial numbers issued by its manufacturer which are displayed on a key must be removed. It must be ensured that keys used can only be obtained directly from the manufacturer or copied by a certified locksmith when permitted by the facility manager.

When not in use, keys must be kept in a locked, secure location which can only be accessed by an authorized person (e.g. lock, card, code access, etc.). Keys may be assigned for short-term or single-day use for persons who need

infrequent access so long as they are returned at the end of the period and this process is tracked.

CRITICAL TASK PROCEDURES: (e.g. Procedures developed for key control under Section B1 – “Product Storage Security” of the CAN Security Code with Key Control Tracking Sheet)

4.3 EMPLOYEE & CONTRACTOR MANAGEMENT

Describe the measures which are in place for the site and/or CAN storage area to manage the people working at the site such as employee and contractor hiring practices. A copy of protocols developed for Section B of the CAN Security Code and reference templates could also be included. Some sample templates can be found in the CAN Code Appendices. An example of what this section could include can be found below.

EXAMPLE:

CURRENT EMPLOYEE LIST

Name	Job Title	Contact

CONTRACTOR LIST

Name	Company	Contact

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. Contractors must sign in at the main office upon arrival to the site and sign out upon leaving the site (even if returning the next day).

PROCEDURES FOR NEW EMPLOYEE/CONTRACTOR: (e.g. Procedures developed for personnel security under Section B3 – “Access by Onsite Personnel” of the CAN Security Code)

4.4 TRANSPORT

Describe the measures used to screen potential transportation companies for hire as well as security measures which need to be followed when CAN is being transported from one location to another. This could include protocols for marine, rail and/or truck depending on the operation. Protocols developed for Sections A and C of the CAN Security Code as well as templates used for tasks and record keeping could be included in this section. An example of what this section could include can be found below.

EXAMPLE:

HIRING POLICY – TRUCKING SERVICES: (e.g. Procedures developed for compliance verification for inbound shipments under Section A1 and A2 – “Security of Inbound Cargo”, and for transport certification under Section C1.1 – “Security Around Individuals or Company Responsible for Providing Transportation” of the CAN Security Code)

CAN DELIVERIES:

In addition to regular shipping documentation, staff coordinating shipments of CAN to or from the site must provide to and review with the truck driver prior to loading product:

1. A copy of the “Secure Transport Procedures”
2. A copy of the transport inspection log template

Reference copies of both listed documents can be found in the section below.

If the shipping destination is to a customer, staff responsible for coordinating the delivery must also ensure that the location of the delivery is confirmed and also to provide the truck driver instructions as to whether the customer or the driver will be signing for the delivery (depending on the customer’s instructions from the time of sale). Staff must also ensure that a signed copy of the delivery receipt (whether signed by customer or driver) is provided back to the site to confirm delivery (electronically or physically).

Secure Transport Procedures

In order to ensure the security of all shipments of CAN, the following measures must be followed:

1. Stops in Transit –
 - 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 truck 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 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 the truck will be inspected once they have arrived at destination prior to unload.
 - 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 retail site so that the local police can be contacted.
4. Spills – In the event of a spill of any other incident which could impact the total quantity of CAN delivered to the destination, the driver must immediately notify the retail site for their records.

4.5 VISITOR AUTHORIZATION

Describe the measures which are in place for the CAN storage area to manage visitors, guests or other individuals who will have access to the CAN storage area and/or site grounds on an irregular basis and are not performing work for the site. Documenting guests and visitors also provides the benefit of having a record of who is on-site at a given time which can be important in the event of an emergency. Reference templates used for record keeping could also be included in this section. An example of what this section could include can be found below.

EXAMPLE:

Task	Responsible Person(s) or Job Title(s)
e.g. Sign in and sign out of visitors or guests at front desk	All staff

On occasion, persons who are not contractors or customers may be present on the site for various reasons. Depending on the nature of the visit, these visitors (e.g. auditors, inspectors, tour guests, etc.) may be present in areas beyond the main office or storefront. In order to maintain the security of the site, responsible staff for the visitors should ensure that the following measures are followed:

- Visitors must be accompanied by a responsible staff member when outside the main office at all times;
- Visitors should be approved by the site manager in advance (if possible);
- Visitors who will be in fertilizer storage areas (outside of the main office/store front) must sign in at the main office upon arrival to the site and sign out upon leaving; and
- Staff responsible for care of visitors should ensure that the other site staff is notified of the expected visitors and the nature of the visit.

4.6 ACCESS TO RECORDS

Describe the measures which will be used to control access to sales records and collected customer information and protect this information from unauthorized access. Records could be physical (kept under lock and key) or electronic (password protected). Access should only be allowed to those who need it as part of their job function and there should be a procedure in place to revoke access upon end of employment at the site. A copy of protocols developed for Section C of the CAN Security Code and reference templates used for record keeping could also be included. Sample templates can be found in the CAN Code Appendices. An example of what this section could include can be found below.

EXAMPLE:

RECORD MANAGEMENT – SITE PERSONNEL RESPONSIBILITIES:

Task	Responsible Person(s) or Job Title(s)
e.g. Collects and inputs customer information into the secure information management system	
e.g. Management of electronic records system database and retirement of old records	
e.g. Grants authority to collect information and access records by creating and assigning computer login access	
e.g. Able to view records	
e.g. Programming and technical management of secure information management system	

All information collected as part of a sale of CAN will be logged into the site's database at time of sale as part of the customer's file. Access to the site database for data input or view of historical customer files will be restricted by use of login identification and password. Database login identifications will be created and assigned to person(s) requiring access only by the responsible person/job title shown in the table above. Login privileges of a person will be revoked immediately upon end of employment or transition to a new role at the

facility which does not require access to customer records. Staff with login privileges should abide by the following rules:

- Only staff who have been granted permission (through assignment of a login identifier) are permitted to access the database
- Do not lend out assigned login information to other colleagues even if they are permitted access to the database
- Computers granting access to the site database should be locked out when not attended or in use

5.0 STOCK MANAGEMENT

A site must keep track of the quantity of CAN on their site. A stock management system provides a method to do this, allowing a site to reconcile their inventory against sales and/or use. The information generated from the stock management system will provide a base of information which can assist in better understanding the site's normal historical losses during storage, transportation and handling (e.g. shrink), enabling easier detection of unexplained losses and assisting in any investigations.

This section describes the procedures for the site's stock management system for CAN. A copy of protocols developed for Sections A, B and C of the CAN Security Code and any reference templates to be used for record keeping could also be included. An example of what this section could include can be found below.

5.1 INBOUND SHIPMENT

Describe the procedures in place used to verify that the quantity of CAN received in a shipment is close to the quantity expected and that any losses (e.g. shrink) are within historical norms for the site. This could include protocols for marine, rail and/or truck depending on the operation. Protocols developed for Sections A of the CAN Security Code as well as templates used for tasks and record keeping could be included in this section. An example of what this section could include can be found below.

EXAMPLE:

This Section includes the procedures that must be followed for all shipments of CAN to the facility. The follow people/job titles are responsible for delivering these described procedures as part of their daily job duties:

Name/Job Title

CAN DELIVERIES – INBOUND TO SITE

This site receives shipments of CAN primarily by truck. During the initial stages of coordinating a CAN shipment inbound to the site, the staff responsible for the delivery must work with the transport company put the following measures in place required to verify the arrival of the shipment, check for tampering or losses, and provide authorization to the transport operator to unload:

1. Verification of Arrival at Destination – In order to verify the arrival of a shipment of CAN:

(e.g. Procedures developed for delivery authorization under Section A5 – “Delivery of Calcium Ammonium Nitrate”)

2. Accepting a Delivery of CAN – When accepting a delivery, staff responsible for receiving the delivery must do the following:

- a. Ensure Delivery Authorization

(e.g. Procedures developed for delivery authorization under Section A5 – “Delivery of Calcium Ammonium Nitrate”)

- b. Check for Tampering or Loss of Product During Shipment

(e.g. Procedures developed for loss/tampering under Section A4 – “Loss or Tampering of Product During Shipment”)

Suspected incidents of theft or tampering, attempted theft or tampering or other losses not attributed to normal operations which are discovered by an employee or reported by a transporter should be reported to [insert assigned responsible person/job title] immediately.

5.2 STORAGE

This section should describe the procedures which are used to annually reconcile the quantity of product being stored at the site against inventory records and inspect the stock for signs of theft or tampering. Procedures should also note the person or job title responsible for carrying out weekly inspections of stored CAN. Protocols developed for Section B of the CAN Security Code as well as templates used for tasks and record keeping could be included in this section. An example of what this section could include can be found below.

EXAMPLE:

INVENTORY MANAGEMENT – SITE PERSONNEL RESPONSIBILITIES:

Task	Responsible Person(s) or Job Title(s)
e.g. Weekly inspection of CAN stock for signs of theft or tampering	
e.g. Annual CAN inventory audit	

WEEKLY INSPECTIONS: (e.g. Procedures developed for inventory management under Section B4 – “Loss of Product During Storage”)

ANNUAL INVENTORY AUDIT: (e.g. Procedures developed for inventory management under Section B4 – “Loss of Product During Storage”)

Suspected incidents of theft or tampering, attempted theft or tampering or other losses not attributed to normal operations should be reported to [insert assigned responsible person/job title] immediately.

5.3 OUTBOUND SHIPMENT

This section would describe the procedures in place to confirm the successful delivery of CAN from the retail site to its intended destination, such as another retail location or a farm. Protocols developed for Section C of the CAN Security Code as well as templates to be used for tasks and

record keeping could be included in this section. An example of what this section could include can be found below.

EXAMPLE:

This Section includes the procedures that must be followed for all shipments of CAN leaving the facility. The follow people/job titles are responsible for delivering these described procedures as part of their daily job duties:

Name/Job Title

DELIVERY CONFIRMATION: (e.g. Procedures developed for obtaining a delivery receipt acknowledgement from a buyer under Section C1.2 – “Delivery Receipt Acknowledgement”)

Suspected incidents of theft or tampering, attempted theft or tampering or other losses not attributed to normal operations which are discovered by an employee or reported by a transporter should be reported to [insert assigned responsible person/job title] immediately.

6.0 SALE OF CALCIUM AMMONIUM NITRATE

This section would include a description of the procedures which would be used to validate potential customers, document, manage and store customer information, and the instructions on refusing sales which are considered suspicious. An example of what this section could include can be found below.

EXAMPLE:

This Section includes the procedures that must be followed for all sales of CAN by the facility. The follow people/job titles are responsible for delivering these described procedures as part of their daily job duties:

Name/Job Title

6.1 VERIFICATION & SALE PROCEDURES

Describe the procedures used to verify customers who are interested in purchasing CAN – particularly new customers whom the retail outlet has never had prior business with before. Before a sale can proceed, the retailer must be satisfied that the potential customer has a legitimate agronomic need for CAN and staff must be trained to recognize the conditions which would not meet the verification requirements of the facility which could potentially lead to a sale refusal. Sales can also be refused if an employee has reasonable grounds to suspect that the CAN will be used for a criminal purpose. This section should describe the conditions which employees should look for that could result in a sale refusal.

Procedures should include the criteria which must be met and the acceptable conditions of meeting them, as well as any company policies set which may add other rules for the sale. Protocols developed for Section C of the CAN Security Code as well as templates to be used for tasks and record keeping could be included in this section. An example of what this section could include can be found below.

EXAMPLE:

CUSTOMER VALIDATION:

This outlet will abide by our corporate company policy which does not accept cash as a method of payment for sales of ammonium nitrate or CAN. Prior to proceeding with a sale and issuing clearance for a customer to acquire CAN from this outlet, the employee coordinating the sale must screen potential customers to ensure that they have a legitimate need for CAN.

CRITICAL TASK PROCEDURES: (e.g. Procedures developed for customer validation under Section C3 – “Validation of Customers”)

Potential “Red-Flag” Conditions: (examples)

- Orders an unreasonable quantity
- Orders out of season

- Claims to represent someone else
 - Only wants CAN and will not consider other products
 - Wants to pick up the product rather than take delivery
 - Is reluctant to provide identification
 - Only wants to pay cash; refuses to pay with credit card
-

6.2 SALE MEETING VERIFICATION REQUIREMENTS

This section would describe the procedures to follow to complete a sale. Once a retailer is satisfied that a customer meets the outlet’s validation requirements the retailer can move forward with the sale, collecting required information, coordinating delivery instructions and providing the customer with information on the safe and secure storage of CAN. Protocols developed for Section C of the CAN Security Code as well as templates to be used for tasks and record keeping could be included in this section. An example of what this section could include can be found below.

EXAMPLE:

SALE OF CAN:

If an employee is satisfied that a potential customer meets the outlet’s validation requirements, they can proceed with the sale by the following procedures:

COLLECTION OF INFORMATION: (e.g. Procedures developed for record retention under Section C4 – “Traceability of Sales Records”)

DELIVERY INSTRUCTIONS: (e.g. Procedures developed for obtaining a delivery receipt acknowledgement from a buyer under Section C1.2 – “Delivery Acknowledgement”)

END-USER INFORMATION: (e.g. Procedures developed for provision of information to end-users under Section C5 – “Criteria Specific to End-Users”)

6.3 REFUSAL OF SALE

This section should describe the procedures an employee should follow if they are not satisfied that a potential customer meets the company’s verification requirements. An example of what this section could include can be found below.

EXAMPLE:

If an employee is not satisfied that a potential customer meets the verification requirements or has reasonable grounds to suspect that the CAN will be used for a criminal purpose, the employee shall not complete the sale.

In such cases, the employee should attempt to retain a thorough description of the purchaser if in person or write down all conversation details if the purchase attempt occurred through phone call. The employee should keep all online conversations if the purchase attempt occurred over e-mail.

Suspicious purchase attempts should be reported to [insert assigned responsible person/job title] immediately.

7.0 OTHER DOCUMENTATION

This section is reserved as a section for other documents, communications or procedures that are required or supportive of the procedures contained in the sections above for easy reference. For example:

7.1 LETTER TO LOCAL POLICE DEPARTMENT

(e.g. Notification letter to local authorities under Section B2 – “Security Plan”)

EXAMPLE NOTIFICATION LETTER TO LOCAL AUTHORITIES

January 28, 2019

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

NOTE:

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

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

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.

In the event that the customer will not be available for a signature at time of delivery, the following alternative procedure will be followed.

1. At sale or prior to delivery:
 - a) Detailed delivery instructions must be provided by the customer either at sale or prior to the delivery date. Delivery instructions (one or more entries based on number of deliveries) will be attached to the paperwork to be filed under lock and key or documented electronically so that the record is directly accessible for future reference to the sales agreement and associated with the purchase order.
 - b) The CAN Safety and Security Information brochure will be reviewed with the customer.
 - c) The Driver-Sign Off Acknowledgement Form will be reviewed with the customer prior to signing by both customer and retail sales clerk. This form must be renewed annually.
2. For delivery:
 - a) Delivery instructions will be provided and reviewed with carrier. Carrier will be instructed to sign delivery receipt to confirm delivery as per instructions.
 - b) Signed delivery receipt will be provided back to the retail facility for their records.

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 DRIVER DELIVERY SIGN-OFF ACKNOWLEDGEMENT FORM

Retailer: _____

Purchaser: _____

Transport Service Operator: _____

"I, customer name, confirm that I understand that it is part of this retail facility's security procedures to confirm the delivery of name of product to its delivery location by way of customer signature at the time of delivery and that for unavoidable circumstances that I have detailed to my retailer, I will be unavailable to provide this signature at the time of delivery. By signing this I affirm that:

- (a) I am aware that name of product is a security-sensitive product and it is my responsibility to ensure that the delivery location is secure and protected against unauthorized access;
- (b) I 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 name of product and will follow these practices to the best of my abilities; and
- (c) I hereby authorize the transportation service operator, as chosen by this retail facility, to sign on my behalf to confirm the product purchased by me from this retail facility was delivered to its destination as per the sales agreement and delivery instructions (attached or as indicated below) provided by me to the retail facility

I have reviewed and understand my responsibilities and give permission to the transportation service, as chosen by this retail facility, to sign in my absence

Customer Signature: _____ Date: _____

Witness Signature: _____ Date: _____
(Retailer)

ORDER NUMBER: _____

NAME OF PRODUCT: _____

QUANTITY TO BE DELIVERED: _____

DELIVERY DATE: _____

DELIVERY INSTRUCTIONS:

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

NOTE:

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

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.

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 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.