



FERTILIZER CANADA

FERTILISANTS CANADA

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## MEMO

**DATE:** December 6, 2019  
**TO:** AWSA Calcium Ammonium Nitrate Security Code Auditors  
**FROM:** Fertilizer Canada  
**SUBJECT:** Environnemental Emergency (E2) Plans for CAN Sites

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This year, the federal government announced changes to their Environmental Emergency (E2) Regulations. The E2 Regulations require sites which handle specified amounts of certain substances to have Environmental Emergency (E2) Plans. With nitrate fertilizers regulated under the E2 Regulations, questions have been raised on how Fertilizer Canada's Calcium Ammonium Nitrate (CAN) Security Code of Practice treats E2 plans.

The CAN Security Code aims to provide uniform security practices for the CAN supply chain in Canada. **As such, its scope is limited solely to security measures.**

While sites who store CAN may have obligations under the E2 Regulations, including the need for an E2 Plan, this is outside of the scope of the CAN Security Code and is not an audited requirement of Protocol B2.

The scope of the CAN Code is different than the Agricultural Ammonium Nitrate Code of Practice (AN Code), which has a broader scope reflective of the more complex regulatory environment for ammonium nitrate. A comparison can be found below:

	CAN Security Code	AN Code
<b>Safety and Storage Construction</b> (e.g. housekeeping, ventilation, no trenches, etc.)	X	✓
<b>Security Measures</b> (e.g. locks, lighting, security plan, etc.)	✓	✓
<b>Environmental Measures</b> (e.g. E2 Plan, notification, etc.)	X	✓

Sites storing CAN who require more information on how the E2 Regulations could apply to them can be provided Fertilizer Canada's guidance document (attached)



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which addresses the application of these Regulations to ammonium nitrate-based fertilizers specifically.

If you have any further questions, please do not hesitate to contact myself or Anthony Laycock at [manager@awsa.ca](mailto:manager@awsa.ca).

Regards,

Amanda Pach  
Director – Industrial & Regulatory Affairs  
Fertilizer Canada