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# Canadian Explosives Regulatory Regime Updates on Key Issues and Inspection Results

Canadian Explosives Association  
May 2023

Canada

# UN3375

## Classification

- Type E.1
- PE1
- Not Class 1
  - Confirmed to meet the requirements of SP309



## Potential Suitability for 75% NEEQ for Bulk Storage

- Previous 75% NEEQ decisions made based on policy letter that was sent to CEAEC
- Current evaluation based on similar language, but not tied to MBP only. Results of Test Series 8 are used, in addition to TNT equivalency and chemical analysis
- Previous approach was not captured in authorization files, so the new applications made for UN3375 suitable emulsions will be all-encompassing, and any amended product files will be complete



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# UN3375

## Parking while On-Route

Explosives being transported in accordance with Part 9 requirements are expected to not stop unnecessarily

- If a stop is necessary, the driver must stop for no longer than required under the circumstances and must park the vehicle away from areas where people gather
- The intent of “away” can be met when the vehicle is parked according to QD, or based on a risk assessment
- A risk assessment can be generalized for high-frequency routes, and for common parking locations
- The expectation is that the parking location that is chosen will be the location where the risk to people and property is as low as reasonably practicable



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## Electronic Attendance

- Language in Part 9 for attendance will no longer specify that attendance in person is mandatory
- An electronic system to monitor the vehicle, as described in the CGI publication can be used to attend the vehicle



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# Bulk Guideline – Revision 9

Revision 9 of the Bulk Guideline has been drafted, translated, and sent to CEAE

- Comment period of 30 days

## Key modifications/changes

- Language modernization to performance-based guidance
- Linking relevant regulatory references
- Removing outdated prescriptive requirements



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# Delivery of Bulk Explosives

## Delivery to sites that are not Mines or Quarries

- All Client Sites need to be identified on the licence

### QD is met at the Client Site:

- If QD is met at the Client Site, then pumping operations can proceed based on the NEQ and PE

### QD is NOT met at the Client Site:

- A QRA may be considered to evaluate the safety distances to exposed sites
- All exposed sites must be identified in the QRA, including occupancy and traffic data



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# eLMS – CEAEC Comments

## MPU Management

- Relocation of MPU
- Amending/Reviewed/Inactive statuses

## Issuance of Receipts



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# Magazine Construction

## Locking Mechanisms

- Deadline for upgrades is July 31, 2026
- ERD is working with fabricators

## Type 6 Magazines

- No new licences will be issued with Type 6 magazines
- Sunset clause for the use of Type 6 magazines is July 31, 2026
- Some use of Type 6 (such as storage within a GLF) will be considered for continued licencing

## Magazine Doors

- Not installed according to door drawings



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# Licensing and Inspection (L&I)



## *Compliance Verification*

Inspection of licensed and unlicensed explosives sites and outreach activities with explosives stakeholders.



## *Licensing*

Licensing of manufacturing, storage, sale and acquisition of explosives.



## *Enforcement and Investigation*

Incident reporting, complaint and incident investigation, emergency assistance.



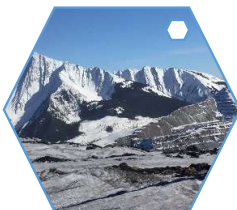
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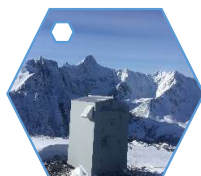
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# L&I – Canada-West

Canada-West  
(BC, AB, SK,  
MB, YT, NT)

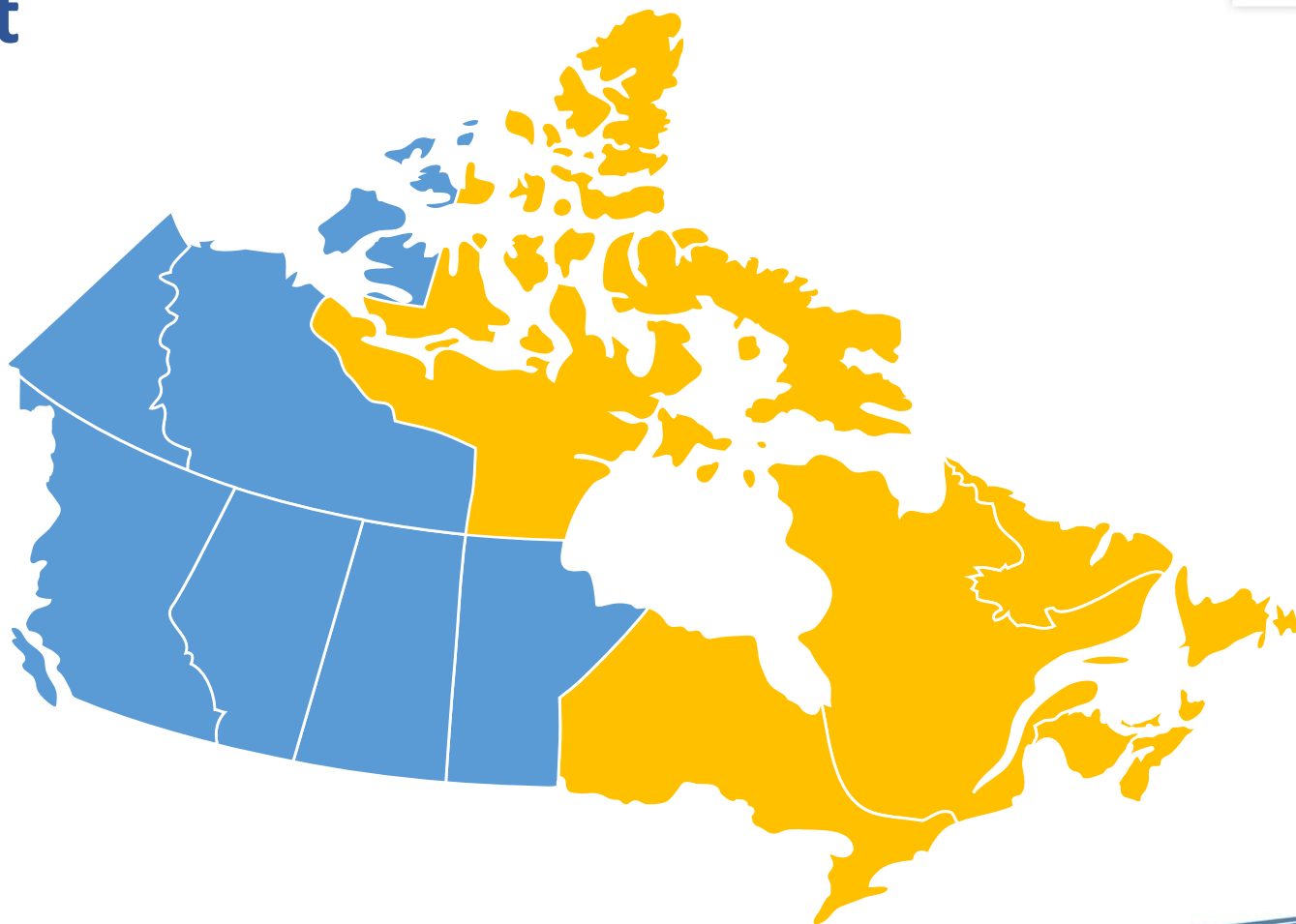


Manager  
David Mohn



## Inspectors

David Murdoch  
Ann-Marie Gorecki  
Grayson Owen  
Stewart McCallum  
Sean Wentzel  
Paul Houle



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# L&I – Canada-East

Eastern Region  
(ON, QC, NB,  
NS, NL, PEI,  
NU)

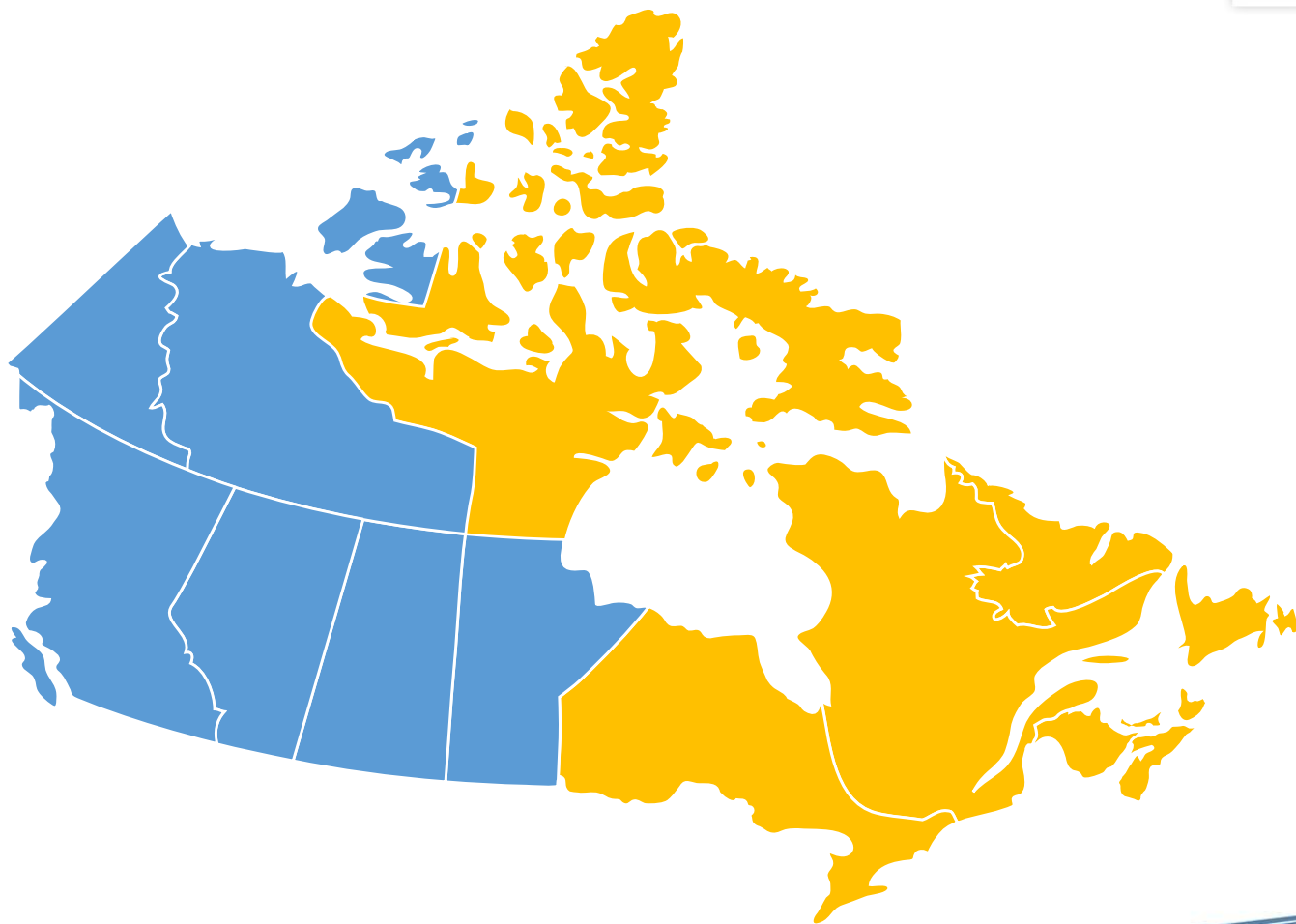


Manager  
Rebecca  
Holmberg



## Inspectors

Aiden Gammie  
Carlo Tesone  
Olivier Pichette  
Kim Tully  
Charles Montpetit  
Troy Glassel  
Michael Graham  
Bruce Bell  
Jean-François Viger



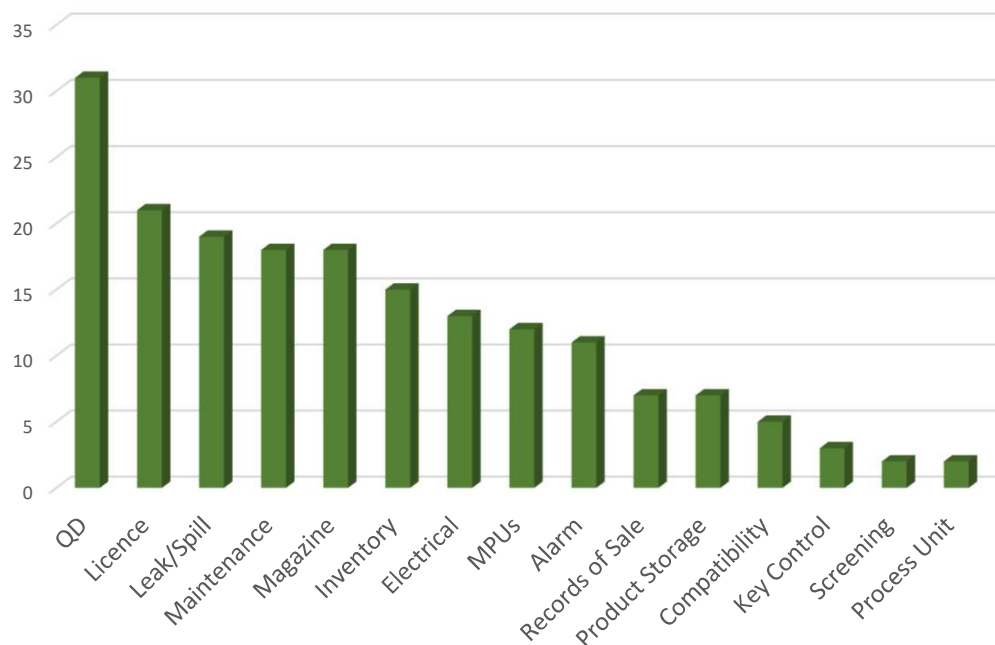
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# 2022/23 Critical and Major Inspection Issues: Manufacturing

Manufacturing Licences



QD

QD not met.

Licence

Licence not posted/available, not accurate, procedures and other documents missing/inadequate, etc.

Leak/Spill

Leaks/spills of explosives and/or AN observed.

Maintenance

Equipment maintenance required, records not kept, etc.

Magazine

Magazine construction, maintenance required, etc.

Inventory

Inventory not kept, count off, missing product, etc.

Electrical

Electrical not in conduit, classification not met, etc.

MPUs

MPU maintenance issues, pumps leaking, etc.

Alarm

No alarm, no call out, daily checks not performed, etc.

Records of Sale

Records of sale not kept or missing information.

Product Storage

Product deteriorated, mislabelled, packaging, etc.

Compatibility

Product compatibility not meeting guideline.

Key Control

Keys given to shared licensee, no key control, etc.

Screening

Screening not up-to-date, no screening, etc.

Process Unit

Process unit does not meet good engineering practices.



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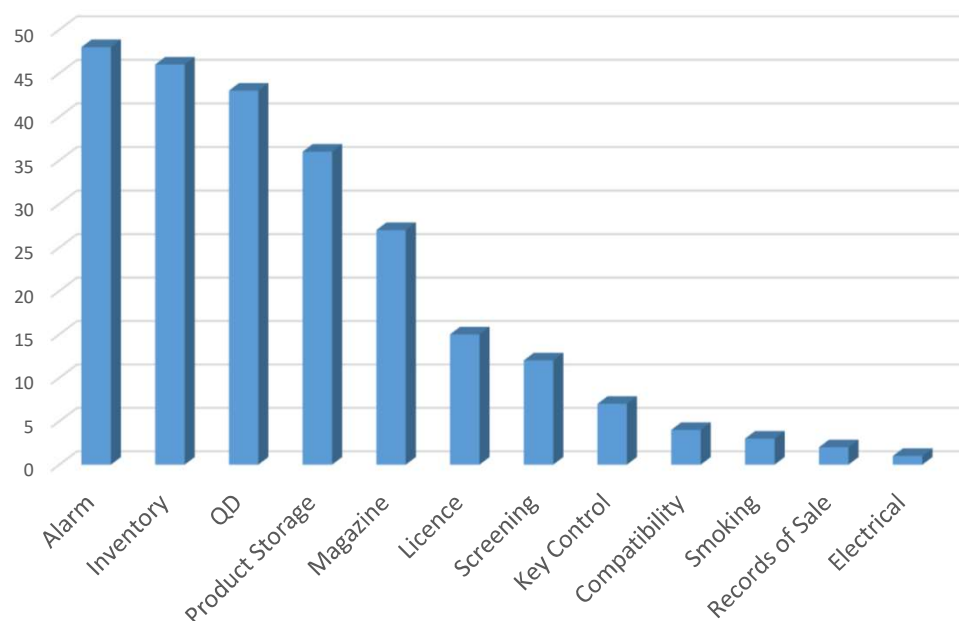
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## 2022/23 Critical and Major Inspection Issues: Storage/Vendor

Storage/Vendor Licences



Alarm

Alarm system not installed, no call out, daily checks not performed, etc.

Inventory

Inventory not kept, count off, missing product, etc.

QD

QD not met.

Product Storage

Product deteriorated, leaking, mislabelled, improperly stocked, etc.

Magazine

Magazine construction, maintenance required, etc.

Licence

Licence not posted/available, not accurate, etc.

Screening

Screening not up-to-date, no screening, etc.

Key Control

Keys given to shared licensee, no key control, etc.

Compatibility

Product compatibility not meeting guideline.

Smoking

Smoking near magazine(s)/process units, cigarette butts near magazine, etc.

Records of Sale

Records of sale not kept or missing information.

Electrical

Electrical not in conduit, not meeting requirements.



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# 2023/24 Inspection Forecast



2021/22

Sites up for inspection: 824  
Inspection weeks assigned: 56



2022/23

Sites up for inspection: 730  
Inspection weeks assigned: 79



2023/24

Sites up for inspection: 1572  
Inspection weeks assigned: 110

## Frequency of site inspections going forward:

Complex Manufacturing sites:

Minimum annually

Manufacturing sites:

Annually

Storage/Vendor sites:

Every 2 years with high rating or annually with low rating



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# Thank You



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