Package 1 Comments.

General Comment, (no comment)

Executive summary section, (no comment)

Issues section, (no comment)

Background section, (no comment)

Objective section,

To classify UN3375 as an explosive to keep control of the substance is going against UN Model regulations and accepted practice in most countries worldwide. CEAEC has proposed that UN3375 be classified for transport as: AMMONIUM NITRATE EMULSION or GEL or SUSPENSION, Class 5.1, PG II, to be in line with UN Model regulations.

The removal of the annual reports is a positive change supported by CEAEC.

Description section

CEAEC has been involved in the regulatory development, many of the regulatory changes were an adoption of CEAEC suggestions for change.

Regulatory development section, (no comment)

Regulatory analysis section

Clarification is required, is the referenced 40 days for explosives authorization business days of calendar days?

 Implementation, compliance and enforcement, and service standards section, (no comment)

PROPOSED REGULATORY TEXT section,

Item 2: CEAEC does not support the addition of UN3375 to part 6 of the ER-2013. This does not align wit the UN model regulations or with are nearest trading partner to the south.

Item 5: CEAEC supports the removal of the fax number requirement from the various sections in the ER-2013.

Item 19: CEAEC supports the clarification of the marking of the division 1 licence exemption on certain means of containment.

Item 22: CEAEC initiative to allow for untended MPU’s waiting towing at mine sites, 100% support.

Item 23: Removal of the words regarding “explosives properties” 100% support.

Item 36: CEAEC initiative to allow for two open packages in a magazine, this reflects industry best practice. , 100% support. Should this be revised to add the word “or add” Other packages or containers may be opened in a magazine for inspection or to remove **or add** explosives, but not more than two packages or containers at a time.

Item 40: 100% supported by CEAEC

Item 43: Positive addition that allows for foreign national security credentials.

Item 44: CEAEC supports the removal of the word “refused” as this adds a to greater security of our explosives materials.

Item 51: The addition of the words “non-sparking” is very problematic and does not align with truck box design where the floor near the rear of the box can be rolled steel. CEAEC ask that this be revised to remove the non-sparking reference.

Item 51: CEAEC supports the words “if feasible” regarding the flat decking permits.

Item 53: Language needs to be added that address the longer transport lanes that require the truck to be refueling en route.

Item 55: The allowance for the parking exemption of 25 kg’s of explosives is a dangerous practice. The reference of 30m separation to a residence is inadequate.

Item 56: The removal of MPUs from the Tracking and communication system is supported by CEAEC.

Item 57: This exemption ties into item 55, again not supported by CEAEC

Item 57: The electronic monitoring requires clarification. 1) what is an access-controlled location. 2) What quality of video surveillance is required? Our concern is fire and the ability to react, ie relocate the explosives if threatened. CEAEC believes that this electronic monitoring should be limited to bulk UN0332 and UN3375 materials only.

Item 59: The adding of word “use” aligns with provincial licensing. The bulk exemption is also a positive direction and align with language in the former BG.

Item 62: How does this fit into 220 (1) (b)?  *except in the case of a container holding industrial explosives in bulk, it contains no explosive residue;*

Item 141. This is refencing 479 which is authorized location. Should this not read point to section 487? We note there no changes to section 487 which is currently the annual inventory references. Please clarify,