



Explosives Regulatory Division
580 Booth Street
Ottawa, Ontario K1A 0E4

21 September 2015

Mr. Stewart McCallum
President
Canadian Explosives Industry Association
Stewart.McCallum@AustinPowder.com

RE: Unattended Site Access to Division 1 Licensed Explosives Facilities

References: CEAEC Letter: Subject – Unattended Site Access to Division 1 Licensed Explosives Facilities, dated 14 May 2015

Dear Mr. McCallum.

Thank you for reference letter, regarding the Canadian Explosives Industry Association (CEAEC) development of procedures and protocols to allow “vetted/trained third-party employees” to have unsupervised access to Division 1 factory or satellite sites, in which “vetted/trained third-party employees” include maintenance contractors (e.g., snow removal personnel) and carriers (i.e., personnel conducting pick-up and drop-off of empty van bodies or highway tankers that transport UN0332 AN emulsion).

We understand that CEAEC would like confirmation as to whether regulatory requirements would be met, if such procedures/protocols were to consist of the following conditions:

Site Access Control

- Non-Transferable Gate Cards or Keys: Either non-transferable gate card(s) or key(s) will be issued to each individual “vetted/trained third-party employee”. Records of the issuance of such card(s)/key(s) will be kept in the site’s key control manual.
- Extent of Site Access: Access by “vetted/trained third-party employees” will be limited to site grounds/exterior parking areas and not to any site buildings or magazines.

Screening

- Screening Requirements: “Vetted/trained third-party employees” that have unsupervised access to a factory or satellite site will possess either an “approval letter” issued by the Minister of Natural Resources under section 183 of the Explosives Regulations or an equivalent document as defined in section 175 of the Explosive Regulations.

Training

- **General Requirements:** The holder of a Division 1 Factory Licence must ensure that “vetted/trained third party employees”, who have unsupervised access to its factory or satellite sites, are subject to the training requirements specified at sections 81 to 83 of the Explosives Regulations.
- **Training Record and Content:** An explosives company must review/approve the training that it provides to its “vetted/trained third party employees” and keep copies of proof of training for each individual “vetted/trained third party employee”. Training will include:
 - **Review of the Explosives Act and Regulations.** Sections which are relevant to the tasks/duties of a “vetted/trained third-party employee” – to include sections 101 to 104 of the Explosives Regulations – will be conducted on an annual basis.
 - **Site Specific Safety, Health and Environment (SHE) Orientation and Induction.** Review and sign-off will be conducted on a bi-annual basis.
 - **Emergency Response Procedures and Protocols.** Review of Emergency Response Procedures and Protocols – to include after hour emergency contacts and company Emergency Response Assistance Plans (ERAP) – will be conducted on an annual basis at minimum, with periodic retraining as required.
 - **Review of the Site's Division 1 Factory Licence.** Review of the licence – to include site security procedures and protocols – will be conducted on an annual basis at minimum, with periodic retraining as required.
 - **Other Site Specific Training.** Other site specific training – to include restricted areas of travel, lone worker procedure and site specific procedures – will be conducted on an annual basis at minimum, with periodic retraining as required.

Driver's Licence Verification

- For all “vetted/trained third-party employees” that have unsupervised access to a factory or satellite site, copies of their valid driver's licences will be kept at the site.

Transportation of Dangerous Goods (TDG) Training Certificate Verification

- For all “vetted/trained third-party employees” that are carriers and have unsupervised access to a factory or satellite site, copies of their valid TDG training certificates will be kept at the site.

This letter serves as confirmation that a procedure/protocol consisting of these aforementioned conditions would be acceptable to the Explosives Regulatory Division (ERD) for regulatory compliance.

For further information on this matter, please do not hesitate to contact me at (613) 618-4946 / ian.lau@Canada.ca.

Sincerely,



Ian Lau
National Manager – Licensing and Inspections
Explosives Regulatory Division

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Cc: Mr. Jean-Luc Arpin
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Explosives Regulatory Division