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Explosives Regulatory Division

CEAEC Update
27 Apr 22



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Agenda

1. Intro - James Stuewe, Director ERD
2. Responses to CEAEC questions
3. Some reminders

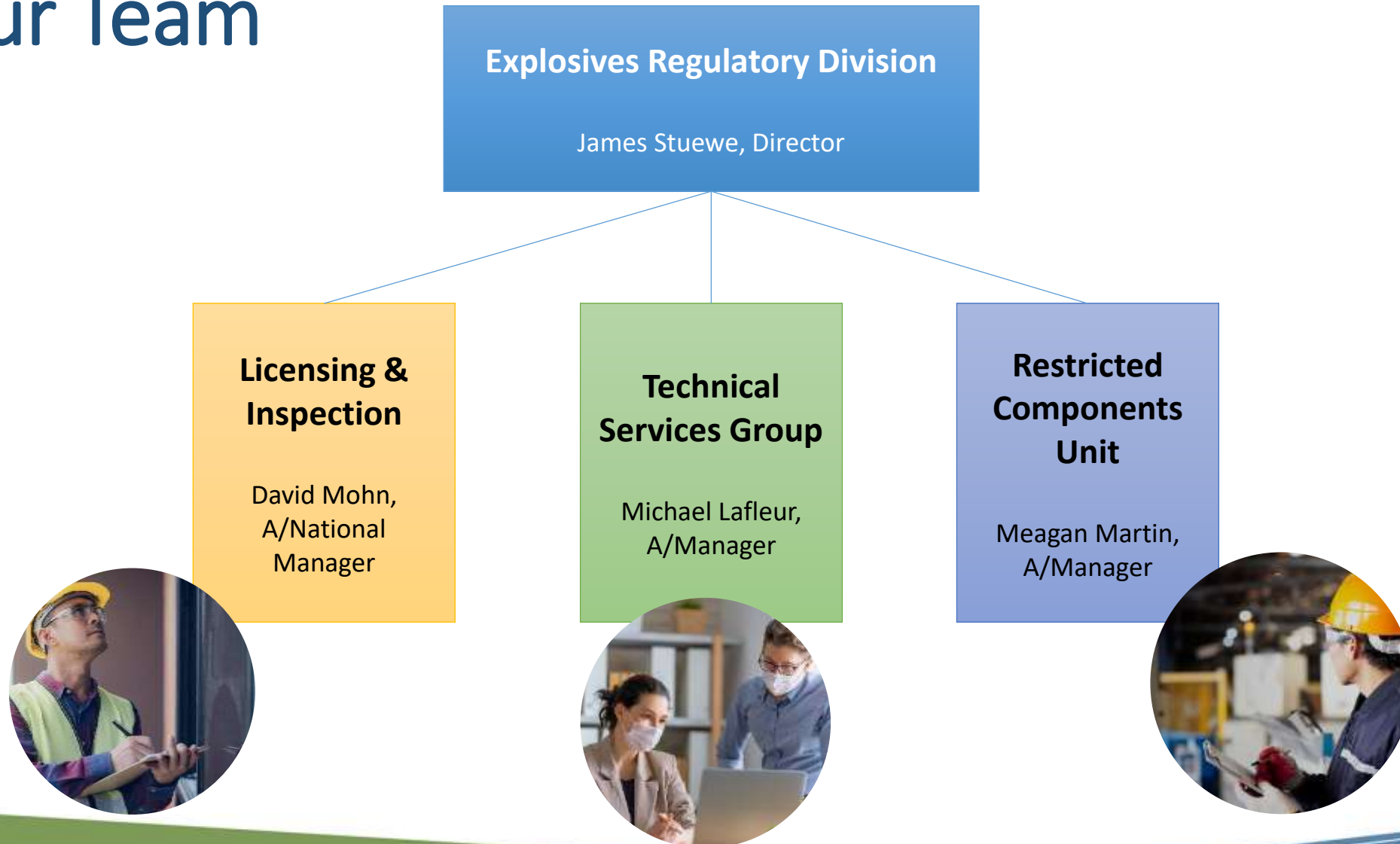


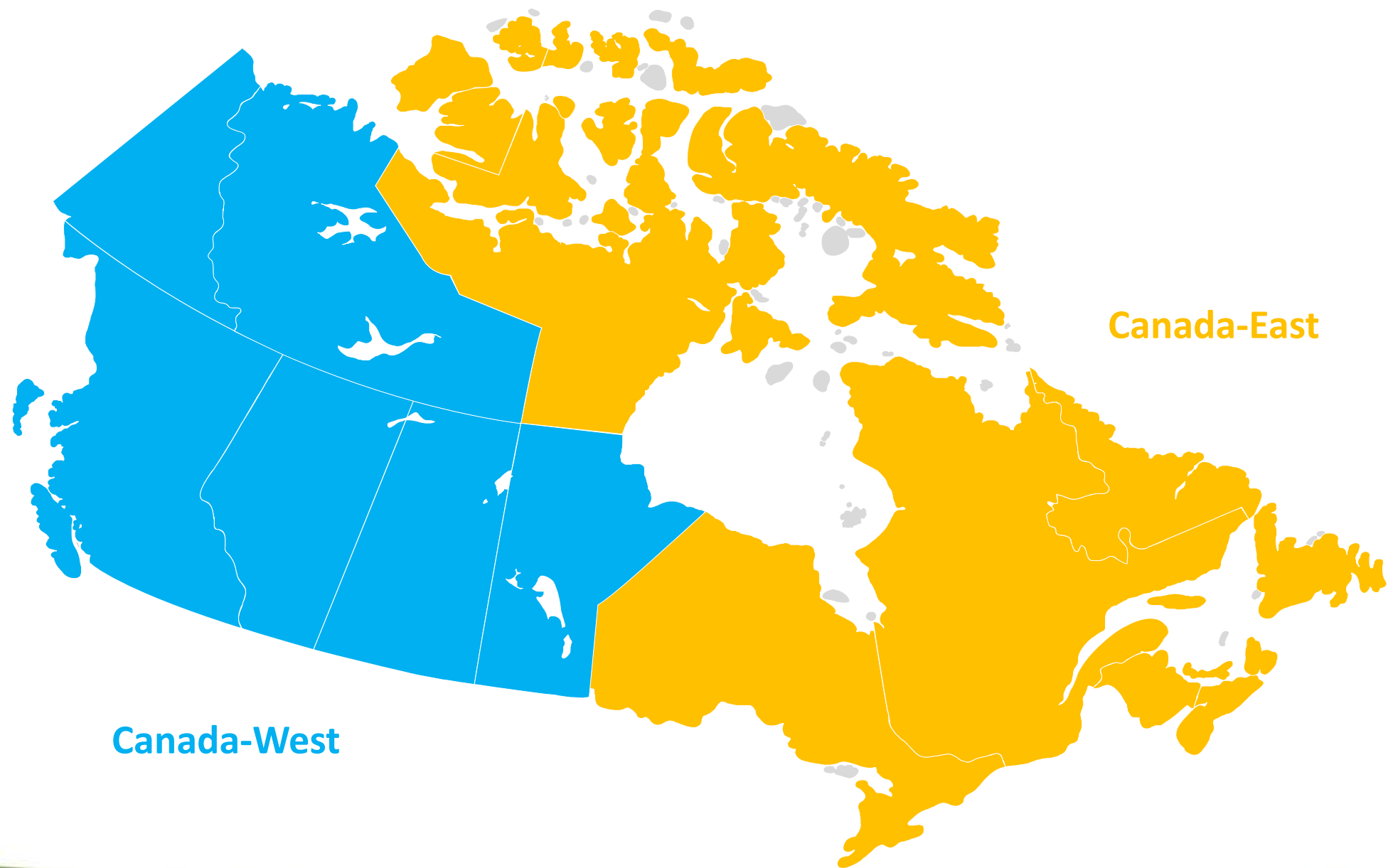
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Our Team





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Supplying Bulk Explosives to Other Sites

What are the requirements for supplying bulk explosives to a non-mine/quarry operation?

- Follow the current Terms and Conditions on your licence;
- If QD cannot be met – QRA (ex, road jobs);
- More to come – This topic is under review.



Quantity-Distance Exemptions

(to supersede *Derogations*)

What are the expected criteria for a QD Exemption?

- **Expected = Meet QD Standard**
 - QRA to support Exemption
 - Other risk-based approaches
 - Engineered measures
- Submit proposal to ERD
- More to come....



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QD to Power Lines



“IMESA FR cannot be used to address QD to power lines. What is ERD’s position regarding risk analysis to power lines that do not meet QD?”

- ERD is willing to review other quantitative approaches.



Update on work related to consideration of UN3375 for the Transportation of Specific ANE



eLMS

- Gap analysis conducted by third party.
- Report submitted and under review.
- No timelines established yet.



Other Questions:

- **Annual Reporting** requirements may change under the ongoing regulatory review.
- **Physical Surveillance of Magazines:** Unless otherwise specified on your licence, daily checks are required.
- **Fuel Storage** (as per the QD Standard):
 - When $< 10,000$ L = Min. 8 m away; or
 - When $> 10,000$ L = Min. 25 m away.
- When Guidelines and/or Standards do not align, contact ERD.
- No formal timeline for the review of the QD Standard.
- Definition of **Surface Blasting or Mining Operation** is a work in progress. More to come.
- Handling of **Carloads of Explosives on Railway Trackage Regulations SOR/79-15:** Please contact the authority having jurisdiction for questions relating to these regulations (Transport Canada).



Factory Licence Renewal Reminders

- Site and Area plans must match Form E.
- Include all Exposed Sites on Form E (*e.g.* fuel storage).
- Highlight any changes on Forms B-E to make it easier to review (remove highlights from previous amendments).
- Form C must indicate all client sites including road jobs, etc.
- Security Plan is a mandatory document to update and submit for each renewal.
- Submit all forms and plans in PDF format, if possible.



Shared (/Y) Magazine Licence Reminders

- Main licence holder is responsible for the shared licence holder's explosives during storage (including inventory, etc.).
- Shared licence holder is not permitted access to magazine keys.
- Shared licence holder must be accompanied / under supervision of main licence holder at all times while accessing the magazines.
- Exemptions may be granted to the above if shared magazine only contains shared licence holder's product. This requires a shared agreement letter to this effect, and resulting terms and conditions on the licence to reflect the exemption (ERD must approve).



Temporary Authorizations (TAs)

- TAs were originally intended for last-minute, short duration situations such as personnel-limit increases or emergency work within D5 at a mine site.
- ERD has been receiving many personnel limit increase TAs. This indicates personnel limits on certain licences are not appropriate for site operations.
- ERD has also been receiving requests for TAs that are months in duration. These will not be accepted. Such situations should be submitted as Exemption requests supported by QRA.
- Last year it was agreed with CEAEC that TAs could be used to grant MPU swaps between factories for no more than 30 days. This remains the policy.



Thank You



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