



Canadian Explosives Industry Association
Association Canadienne de l'Industrie des Explosifs

Technology and Manufacturing Committee Updates

November 17, 2021

Suggested changes to Explosives Regulations

ERD asked CEAEC for suggestions on how the current regulations could be improved.

MANUFACTURING

- The “manufacturing “ definition needs to be modified, particularly for bulk explosives
- Manufacturing definition currently has trigger words like gassing, blending, pneumatic handling, pumping, shearing or thickening. If any of these occur, its considered a manufacturing process and this has QD implications.
- **Example:** ERD just confirmed that an emulsion silo must be at Process Building distance from magazines. This is due to the presence of an emulsion pump at the silo. If the manufacturing definition is changed, this requirement would go away.



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ANE CLASSIFICATION

Changing the classification of Unsensitized ANE's in Canada was our number one suggestion. Canada's classification position is not in line with the global norm.

Maxam Operations:

Angola	UN3375 (5.1)
Australia	UN3375 (5.1)
Austria	UN3375 (5.1)
Bolivia	UN3375 (5.1)
Botswana	UN3375 (5.1)
Brazil	UN3375 (5.1)
Burkina Faso	UN3375 (5.1)
Canada	UN0332 (1.5)
Chile	UN3375 (5.1)
Congo	UN3375 (5.1)
Cote d'Ivoire	UN3375 (5.1)
Croatia	UN3375 (5.1)
Ecuador	UN3375 (5.1)
Egypt	UN3375 (5.1)
Eritrea	UN3375 (5.1)

Estonia	UN3375 (5.1)
Ethiopia	UN3375 (5.1)
Finland	UN3375 (5.1)
France	UN3375 (5.1)
Germany	UN3375 (5.1)
Ghana	UN3375 (5.1)
Greece	UN3375 (5.1)
Guinea	UN3375 (5.1)
Guinea Conakry	UN3375 (5.1)
Italy	UN3375 (5.1)
Kazakhstan	UN3375 (5.1)
Mali	UN3375 (5.1)
Mauritania	UN3375 (5.1)
Papua New Guinea	UN3375 (5.1)
Poland	UN3375 (5.1)

Portugal	UN3375 (5.1)
Romania	UN3375 (5.1)
Russian Federation	UN3375 (5.1)
Slovenia	UN3375 (5.1)
South Africa	UN3375 (5.1)
Spain	UN3375 (5.1)
Suriname	UN3375 (5.1)
Sweden	UN3375 (5.1)
Switzerland	UN3375 (5.1)
Tanzania	UN3375 (5.1)
Trinidad	UN3375 (5.1)
Turkey	UN3375 (5.1)
UAE	UN3375 (5.1)
United Kingdom	UN3375 (5.1)
United States	UN3375 (5.1)
Uzbekistan	UN3375 (5.1)
Zambia	UN3375 (5.1)

Possible Movement???

Following our May 2021 submission to ERD, CEAEC received a summary of the wider Industry submission package and while not directly mentioned, some of our suggestions will potentially be considered.

Safety and Security

Both internal and external stakeholders recommended that regulatory requirements be better aligned with risk. For example, we received suggestions to reduce requirements for explosives deemed to be low hazards, as well as to enhance requirements for explosives deemed to be of greater risk. More specific comments included:

- Acceptable distances should be reviewed;

Development of a regulatory proposal, such as a package of amendments, is a multi-step process beginning with policy analysis. As part of the federal regulation-making process, we are required to conduct detailed analysis, based on the best available information, to support our recommendations. This often includes:

- Comparison with international regimes;

CEAEC Committee Chairs

- The Chair term for the following Committees are concluded:
 - Regulatory
 - Transportation
 - Technology and Manufacturing (TM)
 - Safety, Security, and Environmental (SSE)
- CEAEC would like to propose that new Committee Chairs be selected at this meeting.
- The term for the Committee Chair is two years.
- Please speak with Nicholas Ebsworth or any of the current Committee Chairs if you are interested in assuming this responsibility.