



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

CEAEC MEETING

Ottawa, Nov 7th 2019

Transport/Carrier Committee

LTL (less than truck load) Awareness

TDG Training

LTL

Small shipments of explosives(Less than full Truck Loads)

Examples:

2 cases of detonators to a mine (240g NEQ)

1 pallet of power line implodes (65kgs NEQ)

LTL

Need :

Explosives users such as Powerline Construction, Avalanche Control & OWP.

Large Users such as Mines, Quarry's and Seismic.

Hurdle:

Transport charges by explosives company's sometimes far outweighs the cost of the product.

LTL – What could possibly go wrong

No Placards

No Team Drivers - Attended Loads

In Refer Units (running and not running but fueled)
Delayed -10 days cross Toronto to Calgary (3 day run normally)

Lost/ Delayed Product due to delivery delays/schedules.

Mixed Loads/General Freight with Explosives (ERD Non-Explosives with Explosives ...Permits)

DG Segregation (Dets with Hi-Ex)

LTL

CEAEC is “contemplating” suggesting an amendment to ER-2013 to include the following to Part 9, 192(3 & 4) which currently reads:

Items transported with explosives

(3) The shipper and the carrier must ensure that things other than explosives are not transported with explosives unless

(a) in the case of a vehicle that contains no more than 2 000 kg of explosives, the things are stowed, or separated from, the explosives so as to minimize the likelihood of an ignition; and

(b) in the case of a vehicle that contains more than 2 000 kg of explosives, the vehicle has been authorized to transport the things by a permit issued by the Minister under paragraph 7(1)(b) of the *Explosives Act* and the permit is in the vehicle.

Permit to transport non-explosive items

(4) A shipper or a carrier who applies for a permit to transport things other than explosives in a vehicle that will contain explosives must complete, sign and send to the Chief Inspector of Explosives the application form provided by the Department of Natural Resources. The application must include the following information:

(a) the applicant's name, address, telephone number, fax number and email address;

(b) a list of the non-explosive items to be transported with the explosives in the vehicle; and

(c) the precautions that will be taken to eliminate any possibility of an ignition.

LTL

Suggest removing the under 2,000kg exemption for **Type E and Type I** explosives only

Resulting wording would imply:

ALL loads containing Type E & I explosives that contain cargo other than explosives would require the carrier to obtain the "Permit to Transport Non-Explosives Items with Explosives"

LTL

This would then require transporters that wish to engage with the explosive industry to apply for the permit as referenced in 192(4)

Companies would be required to :

- A) Contact the ERD (for those that don't know of its existence ...)
- B) Provide the ERD with the assurances they seek in granting the permit 192(4a)&(4b)

LTL

Positives:

- Explosives Companies and Clients could then request that permit as part of their vetting process...
- Explosive carriers will have better knowledge of the part 9 requirements.

Negatives:

- Permitting burden placed on the ERD.
- Drastic drop in the number of carriers “legally” able to transport explosives.

LTL

Future Possibilities:

ERD Enhanced Security Screening to include Transporters

TC CID (Client Information Database)

TDG Training

TDG Training

CEAEC has met with Transport Canada and the ERD several times over the last 2 years to discuss the inclusion of explosive content/requirements.

TDG Training

Specifically inclusion of explosive
specific training pertaining to Part 9 of
ER - 2013

TDG Training

The proposed amendment was released for public comment without CEAEC suggestions

CEAEC and member companies submitted comments requesting the following inclusion in the TDGR proposed training standard.

1	2	(3)	4	5	(6)	(7)
MB ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the MB Commentaires (justification) par le MB	Proposed change by the MB Changement proposé par le MB	Secretariat observations on each comment submitted <u>Note de la secrétaire sur chaque commentaire soumis</u>
A. L.	6.2		te	<p>In addition to the TDGR requirements, the handling, offering for transport and transporting of class 1 materials has specific requirements under the federal Explosives Regulation, (ER-2013).</p> <p>Part 9, Explosives Transportation of the ER-2013 contains special requirements / conditions for class 1 materials during the transport that are not included or covered within many of the current TDGR training courses.</p>	<p>Request that new section be added to 6.2 <i>Function specific Training and Assessment</i> that references the additional <u>training requirement</u> for class 1 materials.</p> <p>The reference must point directly to the part 9 of the ER-2013.</p> <p><u>Example</u></p> <p>6.2.x.x Task list for class 1</p> <p>In addition to the requirements of part 6.2.1.1, employers shall ensure that every person involved in the handling, offering for transport and transporting of class 1 materials are trained:</p> <ul style="list-style-type: none"> i) Explosives exemptions ii) Vehicle requirements iii) Driver requirements iv) Transportation requirements v) Security / Monitoring 	

Questions?