



Explosives Magazine Licence Application - Supporting Documentation Requirements

CAGC INFORMATION ALERT

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The new Explosives Act and its empowered Explosive Regulations come into force on February 1, 2014. This alert describes the document requirements that must accompany an application for an explosives magazine.

Useful links:

Here is a link to the new Explosives Act...

<http://laws-lois.justice.gc.ca/eng/acts/E-17/>

Here is a link to the new Explosives Regulations...

<http://www.gazette.gc.ca/rp-pr/p2/2013/2013-12-18/html/sor-dors211-eng.php>

Here is a link to Part 6 of the new regulations...

<http://www.nrcan.gc.ca/explosives/acts-regulations/9841#p6>

Here is a link to ERD Form -10 Magazine Licence Application...

<http://www.nrcan.gc.ca/explosives/acquisition-storage-sale/9835>

Here is a link to ERD Bulletin # 16 ...

[Bulletin #16 NOTIFICATION OF CHANGE OF LOCATION OF ...](#)

Part 6 of the explosives regulations sets out how to obtain a vendor magazine licence, a user magazine licence, or a user magazine zone licence. It also set out the rules applicable to holders of these licences. If a magazine licence to store is required in another Part, this is the Part used to obtain that licence. Here are the new requirements.

Some additional information is required in the application under the Explosives Regulations, 2013 and there is the requirement to have or provide additional documents. Additional documentation includes:

- the requirement to submit a Security Plan with the application for a magazine licence for explosive types E (high explosives), D (military and law enforcement explosives), and I (initiating explosives) explosives, and to implement and update it;
- the requirement to submit a Fire Safety Plan;
- the requirement for a Key Control Plan; and
- if applicable, the requirement to submit an expired marine flare destruction plan.

In addition to the above, the Explosives Regulations, 2013 include:

- a change of location requirement for user magazine zone licences; and
- regulations addressing deteriorated, expired and misfired explosives.

Frequently Asked Questions about Explosive Magazine Licence Applications

Q- 1. What additional information is needed to apply for a licence?

Support documentation will be made available with the application explaining the information required in each block on the form. There are also guidance documents to assist in developing other documentation required such as the Security Plan, Fire Safety Plan, and Key Control Plan.

Q-2. Why is a Security Plan required?

The requirements for a Security Plan are contained in the Explosives Regulations, 2013 and are required for magazine licences storing type E (high explosives), type I (initiation systems), and type D (military and law enforcement) explosives. It is intended to ensure licensees have addressed specific elements involved in the security of the explosives under their control and a response to security issues. The plan is required to be submitted with the initial application and upon renewal following the coming into force of the Explosives Regulations, 2013. The Explosives Regulations, 2013 also require that it be implemented and updated if there is a change of circumstances with could adversely affect the security of the explosives. A guideline document is available to assist licensees with their Security Plan and contains a sample plan.

Q-3. What is a Fire Safety Plan? Why do I need one?

The requirements of a Fire Safety Plan are included in the Explosives Regulations, 2013 and are required for all magazine licences. It is a plan outlining measures to be taken in the event of a fire involving or threatening explosives under the licensee's control and includes notifications and training. The plan must be put into place and updated if a change of circumstances adversely affects the explosives. The Fire Safety Plan must be prepared and submitted with the initial application or upon renewal following the coming into force of the Explosives Regulations, 2013. A guideline document is available to assist licensees with their Fire Safety Plan.

Q-4. What is a Key Control Plan?

Prior to the Explosives Regulations, 2013, the requirements for a Key Control Plan were included in the Storage Standards for Industrial Explosives, 2001. With the inclusion in the Explosives Regulations, 2013, a Key Control Plan is now required for all magazine licences. Key control is an integral part of explosives security and the inclusion of the requirement in the Explosives Regulations, 2013 reflects its importance. The requirements include numbering of the keys, providing a list of persons who have access to the keys, and securing keys when not in the possession of a person on the list. The plan must be updated to reflect any change of circumstances. A guideline document is available to assist with the development of a Key Control Plan.

Q-5. What does "changes of circumstances" mean?

A change of circumstances means any issue that adversely affects a site and requires plans to be updated. These can include such things as the addition of a magazine or building, encroachment, or increased security risks, and may also include a change in personnel.

Q-6. Why is a marine flare disposal plan required?

Marine flares have an expiry date after which they must be replaced. This is a requirement under the Canada Shipping Act administered by Transport Canada, which mandates that these flares have a maximum service life of four years. Under the Explosives Regulations, 2013, distributors are required to provide plans for their collection and disposal along with their vendor magazine licence application.

Q-7. What is “acceptable distance”?

Magazines containing explosives are sited on the basis of risk. The prime reference is the Quantity Distance Principles – User’s Manual (the tables are on the Explosives Regulatory Division web site, but the complete manual is available for purchase from the Explosives Regulatory Division). Before issuing a licence, an Explosives Regulatory Division inspector will ensure that the distances given in the application meet requirements. However, an Explosives Regulatory Division inspector will not be at the new site when a magazine is relocated under a user magazine zone licence. It is the responsibility of the zone licence holder to ensure that the distances meet the requirements of the Manual.

Q-8. How much longer will it take to get a licence under the Explosives Regulations, 2013? How much more will it cost?

Under the Explosives Regulations, 2013, the only additional requirement is to submit a Security Plan and a Fire Control Plan for review prior to getting a new licence or upon renewal following the coming into force of the Explosives Regulations, 2013. Delays may be seen if there is information missing from the plans. The only other delay may be due to an applicant waiting on their security clearance (see Part 8). Additional costs may be associated with the additional time required to develop a Security Plan, a Fire Safety Plan, and a Key Control Plan if these are not already in place.

Q-9. What is repackaging?

Repackaging is taking the contents out of the boxes or containers they are shipped in and placing them in another package. A repackaging certificate will be required if it is done in a different type of package or if it will be done differently since this might affect its transport classification and approval.

Q-10. Why do I need to put two distances on my application form?

One is the actual distance and the other is the required distance from the Quantity Distance Principles – User’s Manual. Should the required distance be greater than the actual distance, the applicant can address it prior to submitting the application or request an exemption.

Q-11. Are signs still required?

Signs will still be required, but they will be addressed using Terms and Conditions on the licence.

Q-12. Will I need a third magazine (in addition to powder and detonator magazines) for storing deteriorated explosives awaiting disposal?

Only if the deteriorated explosives present an increased storage hazard will they be required to be stored in a dedicated magazine.

List of Apendices

Appendix A – CAGC Security Plan Sample 7
Appendix B – CAGC Fire Safety Plan Sample 21
Appendix C – CAGC Key Control Plan Sample 25



Appendix A





SECURITY PLAN

FOR STORAGE AND TRANSFERRING EXPLOSIVES

JOB NAME HERE

Revisions

| Date | Version | Comments |
|------------|---------|---------------------------------|
| 05/01/2012 | 00 | Initial Draft Document Created. |
| | | |
| | | |
| | | |
| | | |

Approval

| | Author | Checked by | Approved by |
|----------|------------------------|------------|-------------|
| Function | Mgr. Safety & Training | | |
| Name | | | |
| Date | 05/01/2012 | | |
| Visa | | | |

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1. INTRODUCTION

1.1. Purpose of Document

The purpose of this Security Plan is to provide an overview of the specific actions that will be taken for the **XXXXXXXXXXXXXXXXXXXXXXX** project to prevent the threat of theft of explosives during operations in order to ensure workers integrity is maintained, protect equipment, materials and operations against the risk of loss or damage.

1.2. Scope

In formulating and implementing the Security Plan, we will identify reasonably foreseeable risks of theft; assess the vulnerability and potential impact of this threat.

This Plan sets out the requirements to be observed and the procedures to be followed in relation to the storage and transport of explosives during the operations in order to prevent the theft.

The plan comes in addition to applicable national rules and regulations concerning storage, transporting and handling explosives.

1.3. Responsibilities

- The PM and / or RCM is responsible for the application of this plan.
 - Ensuring that sufficient resources and attention are devoted to the security.
 - Development of an effective notification and reporting system for security incidents and emergencies
- The Drill Push is in charge of access keys of the storage and he is responsible:
 - For maintaining and ensuring the security of explosives held on the site.
 - For reporting any unexplained loss, theft, attempted theft, or any other security incident involving explosives.

- All Personnel

All personnel must understand and adopt their roles and responsibilities during normal operations and in emergency conditions.

- Immediately reporting all suspicious activity, no matter how insignificant it may seem, to the PM/RCM or the HSE Advisor.
- Immediately reporting all security incident involving explosives.

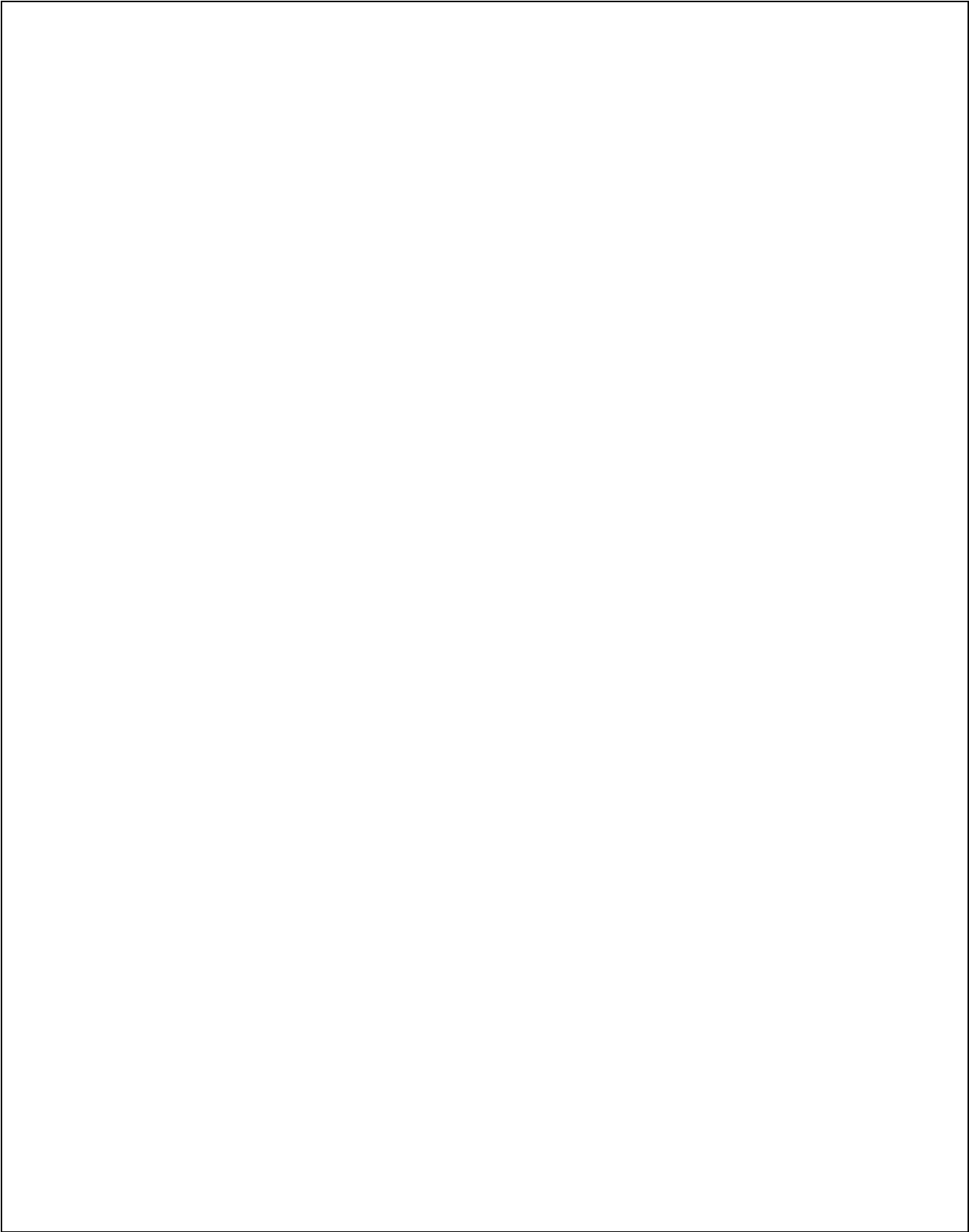
2. VULNERABILITY ASSESSMENT

Over the past years, few actual thefts or attempted thefts of explosives in seismic operations have occurred. In order to face this issue, some actions have been already implemented through the regulation in the past projects, however the threat still exists.

Taking into account all actions that have been already implemented, we consider that the principal potential threats that are most likely to arise are:

- Threat: During the loading of explosives in the vehicle, thieves could break into the storage and take over the explosives.
 - ↳ Vulnerability: The area of the storage accessible to third party.
- Threat: En route from the storage to the field, the vehicle of explosives can be attacked.
 - ↳ Vulnerability: The prospect roads are used by third party.
- Threat: En route or in the field, thieves could steal the explosives.
 - ↳ Vulnerability: Explosive Vehicle or Drilling rig is left unattended.

3. SKETCH/MAP OF SITE.



4. CONTINGENCY PLANS AND OPERATING PROCEDURES

4.1. Security Systems

A number of security systems designed to help protect the operations will be implemented. These systems complement the policies, procedures, and measures that will form the security plan and include:

4.1.1. Site Lighting

Exterior lighting will be strategically placed throughout the camp to emphasize and highlight gate access points, explosives storage area.

4.1.2. Gate

The number of access point onto the camp will be limited and if feasible, the gate will be situated in location that is highly visible with a control access point.

4.1.3. Signage

Warning signs "Restricted area", "No Trespassing" and "Authorized Access Only" will be posted in storage area to discourage trespassing.

4.1.4. Secure storage

The design, construction of the explosives storage and the locks will comply with the Regulations.

4.1.5. Storage location area

Storage sites will be kept if possible visible and located at safe distances from other occupied locations so that the accidental explosion of its contents is not likely to cause any serious damage to other buildings or injury to persons. If possible, the area perimeter will be delineated by hazard ribbon.

4.1.6. Access to storage area

There must be procedure for controlling access to the explosive magazine. This access will be limited to only authorized personnel.

4.1.7. Communications

A communication tree with double redundancy (radio and cellular) will be established to ensure communications remain effective in the event of a major security or safety incident. The radio will consider as primary mean of communication.

4.1.8. Secure transport of explosives

The route to be used for the journey will be identified and the vehicles transporting explosives will comply with the applicable regulations.

4.2. Operating Procedures

4.2.1. Access to Explosives Storage

➤ Authorized persons

Only the PM / RCM / HSE Advisor / Drill Push and a designated Helper/Assistant are to enter the explosive storage.

- Only the Drill Push will have the keys or codes to access to the storage.
- A designated Helper/Assistant will be appointed to help loading or unloading explosives into vehicle. He will be all times supervised and the loading/unloading operations monitored by the Drill Push.
- PM / RCM / HSE Advisor will enter the storage for general inspection.

Important: The Drill Push is the only person to have unsupervised access and is mandated to escort at all times all other authorized persons.

➤ Access procedure

The following are the minimum general rules and guidelines

- The Drill Pushes will practice pertinent radio operational procedures and ensure all transmitters are fully operational and available for immediate use on distress.
- Prior to entering the Explosives storage, the Drill Push must inform the MEDIC of his intention to access the explosives area and the purpose (loading/unloading explosives or Routine inspection).
- Regular check-ins will be made to the MEDIC when safe to do so.
- A record of the access and leaving time will be recorded by the MEDIC.

4.2.2. Transport of explosives / Journey Management

The following are the minimum general rules and guidelines

- The Drill Push responsible for the transportation of explosives is to ensure:
 - That suitable communications systems are available that will allow for communication from the vehicle to the organization throughout the complete journey.
 - That an appropriate communication plan (covering as a minimum a radio check prior to leaving the start location and informing on arrival at destination) is in place for the journey.
 - That a route map is prepared covering the complete journey.
 - That the vehicle employed to transport explosives is well maintained, in good working order and inspected to avoid any breakdown during the transit.
 - That the driver and drivers assistant are aware of all actions to be taken covering all possible eventualities during the journey i.e. breakdown, accident, robbery, etc.
- No passengers are to be carried in vehicles transporting explosives.
- Vehicle transporting explosive will not be left unattended at any time.
- The journey management will be reinforced, and the Drill Push must communicate his position when moving to drilling points
- If vehicle carrying explosives are to be travelling in convoy, then the distance between vehicles is to be a minimum of 100 meters on Highway and 50 meters on private roads.

4.2.3. In case of vehicle breakdown

In case of vehicle breakdown, the Drill Push must:

- Inform immediately the MEDIC and if possible the PM/RCM and HSE Advisor.
- Take necessary measures to prevent any danger to other vehicles or people in the area.
 - Place warning triangles as defined in Road Site Protocol to indicate the vehicle is stationary.
 - If it is a control road, use the radio to alert oncoming vehicles while specifying the location.
 - If safe to do, stay at a distance of 25m with a flag to warn oncoming traffic and ensuring traffic slows down, stops or overtakes safely.
- Be in alert to third parties.
- Avoid leaving the vehicle unattended.

4.2.4. Employee Assault

As a general rule, during an assaulting, the more time that passes without incident, the better. Following are general guidelines in the event of a assaulting:

- Remain calm.
- Do not resist unless there is a clear life-threatening situation.
- Broadcast a distress message, if possible.



Appendix A

APPENDICES

A1 – Glossary, Definitions, Abbreviations and Acronyms

A2 – Journey Management Plan

A3 – Inventory of Various Magazines on Site

35
YEARS

CAGGC

Prosper Together, Falter Alone.

APPENDIX A1 – Glossary, Definitions, Abbreviations and Acronyms

ERP – Emergency Response Plan

ERAP – Emergency Response Assistance Plan

HSE – Health, Safety & Environment

JMP – Journey Management Plan

PM – Project Manager

RCM – Regional Construction Manager

SP – Security Plan



APPENDIX A2 – Example Journey Management Plan

| NO | DATE | TIME | DONE | DATA |
|----|------|------|------|---------------------|
| 1 | | | | DRIVER NAME |
| 2 | | | | HELPER NAME |
| 3 | | | | VEHICLE ID |
| 4 | | | | VEHICLE INTERVAL |
| 5 | | | | ROUTE MAPPED? |
| 6 | | | | FATIGUE REST #1 |
| 7 | | | | FATIGUE REST #2 |
| 8 | | | | EMERGENCY KIT |
| 9 | | | | COMMUN. WORKS? |

ROUTE DESCRIPTION

| |
|--|
| |
| |
| |
| |
| |

APPENDIX A3 – SITE LIST OF VARIOUS MAGAZINES

1. Magazine Type
2. License #
3. Floor Area
4. Overnight Storage?
5. Powder Capacity (kg)
6. Detonator Capacity (ea)
7. Detonator cord (meters / Spools)

| ITEM # | 4 | 6 | 9 | 10 | Day Box |
|--------|--------|-----|-------|--------------------|---------|
| 1 | | | | | |
| 3 | | | | | |
| 4 | | | | | |
| 5 | 20,000 | 100 | 2,000 | 25 | |
| 6 | 20,000 | 500 | 2,000 | 1000 ea | |
| 7 | | | | 600m / 2 spl | |

Appendix B



Sample Seismic Fire Safety Plan

Fire Safety Plan for ABC Limited – Merivale Site

Last Updated: May 17, 2013

Next Review: May 2014

Revision Number: 01

Responsible Person for Review: J. Smith

The contents of this Fire Safety Plan are confidential and are only to be provided to those persons who have a responsibility under the plan. The plan must not be provided to any persons outside ABC Limited except to those persons who have a legitimate need (Explosives Inspectors, peace officers, and fire departments).

Licensee Information and Site Identification

Company Name: ABC Limited

Licence Number: X99999

Address: 500 Booth Street, Ottawa, ON

Phone: 613-948-5200, Fax: 613-948-5195

Site Address: 1431 Merivale Road, Nepean, ON

Site GPS: 45° 21' 48.50" N, 75° 43' 55.57" W

Site Contact: John Smith, 613-999-9999

Alternate Contact: Jane Doe, 613-999-9988

Site Description

The site is located west of Ottawa. There are two fireworks magazines containing display fireworks (type F.2) and family fireworks (type F.1) on the site located approximately 300 metres from a building containing offices and maintenance facilities. The building is metal clad construction with a metal roof. There is a 2000-litre fuel storage tank located 250 metres from the magazines and the site is surrounded by dense bush. The total quantity of fireworks stored is 10 000 kilograms and there is no power going to the magazines. The number of employees on site is 10, of which 3 have access to the magazines.

Identification of Fire Hazards and Measures Taken

To minimize the risk of fire on the site, the fireworks are stored in seacans modified to comply with the Auxiliary Explosives Storage Guide. All dense growth and combustibles in the vicinity of the magazines have been removed to a distance of 10 metres. No smoking or open flames are permitted around the magazine and signs have been posted. Appropriate portable lighting is available if access to the magazines is required during non-daylight hours. Employees are also trained to identify and remove any potential sources of fire from the vicinity of the magazines such as fallen branches or debris. The office and maintenance facility have been constructed to comply with the national building codes, electrical codes, and fire codes. Fire extinguishers have been installed and inspected on a regular basis. In the event of lightning in the area, the magazines are closed and locked and the area is evacuated.

Note: If company procedures are available, then reference can be made to them and attached as part of the Fire Safety Plan.

Example:

- *Prevention of fire hazards are found in Procedure # 200 (Prevention of Fire at ABC Limited – Merivale Site) (Annex A).*

Emergency Procedures

In the event of any fire at the Merivale site, the fire department is to be notified by calling 613-555-7890 (or 911 if available in the area). The person who first noticed the fire is responsible for ensuring the fire department is notified. The site manager (or most senior person on site if the manager is not available) must take charge. If the fire involves or is threatening the fireworks, evacuation procedures must be initiated.

The manager (or alternate) must ensure all persons on the site have evacuated to the designated assembly area and are accounted for.

The manager (or alternate) will meet the fire department at the gate and provide details on the fire, including recommendations.

Note: If company procedures are available, then reference can be made to them and attached as part of the Fire Safety Plan.

Example:

- *Emergency Procedures are found in Procedure # 201 (Emergency Procedures at ABC Limited – Merivale Site) (Annex B).*

Determination for Fighting a Fire

Note: This is an example only. The determination to fight a fire must be appropriate for the site.

A fire involving fireworks or within 10 metres of the fireworks magazine is not to be fought and evacuation procedures are to be initiated. Fires greater than 50 metres from the fireworks magazine can be fought. For fires within 10 to 50 metres of the fireworks magazine, the site manager will determine if the fire will be fought based on fire size, wind direction, wind speed, and available personnel and equipment.

Note: If company procedures are available, then reference can be made to them and attached as part of the Fire Safety Plan.

Example:

- *Detailed procedures for determining if a fire can be fought can be found in Procedure # 202 (Evacuation Procedures for ABC Limited – Merivale Site) (Annex C) and Procedure #203 (Fire-Fighting Procedures) (Annex D).*

Training

Training on the procedures contained in this Fire Safety Plan and the attached annexes is to be provided to all who will be required to follow them. It is the duty of the person responsible for the plan to ensure all necessary training has been provided and recorded in the employees' training files. Training is to be provided once per year.

Note: If reporting is described in the company procedures, they can be referenced here and attached as part of the Fire Safety Plan.

Example:

- *Training of personnel is described in Procedure # 204 (Training of Personnel) (Annex E).*

Reporting

All incidents involving explosives must be reported to the local fire department immediately and to the Chief Inspector of Explosives (CIE) as soon as circumstances permit. The fire department is reached by calling 613-555-7890 (or 911). Incidents to be reported to the CIE include fire, explosion, injury, death, and property damage. An incident can be reported by calling, emailing, or faxing your regional office or by phoning 613-948-5200, e-mailing canmet-erd@nrca-nrcan.gc.ca, or faxing 613-948-5195. The form contained in Annex F (Form F07-01) can be used to report incidents to the CIE.

Any injuries or deaths are to be reported to Workplace Health and Safety at 555-111-2222.

All reporting is the responsibility of the person in charge at the time of the incident with follow-up by the person in charge of the Fire Safety Plan for this site.

Annex A

- Procedure # 200: Prevention of Fire at ABC Limited – Merivale Site

Annex B

- Procedure #201: Emergency Procedures at ABC Limited – Merivale Site

Annex C

- Procedure #202: Evacuation Procedures for ABC Limited – Merivale Site

Annex D

- Procedure #203: Fire-Fighting Procedures

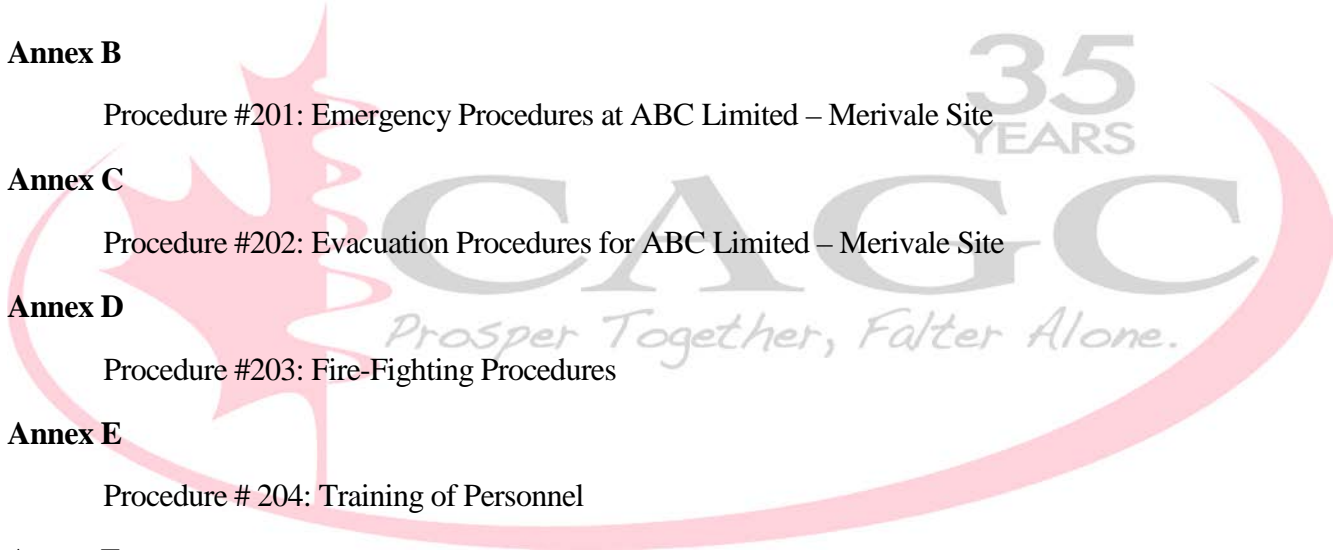
Annex E

- Procedure # 204: Training of Personnel

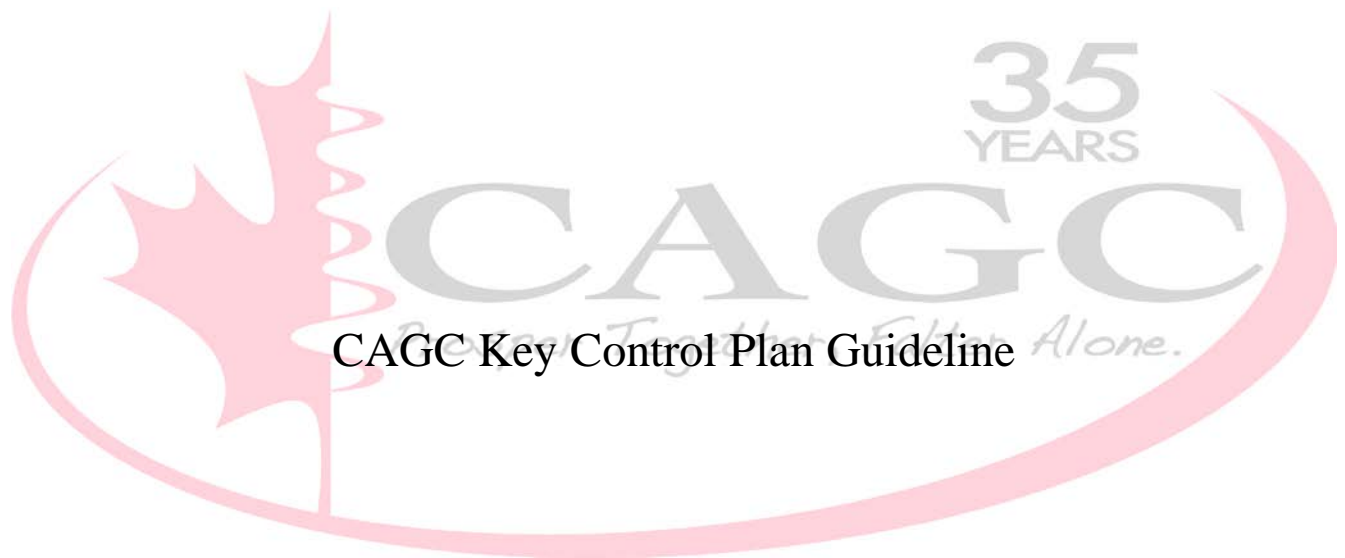
Annex F

- Form F07-01 (Incident Report Form)

Date Modified:
2013-12-18



Appendix C



Key Control Plan

In order to minimize unauthorized entry, access to a magazine must be limited by key control through procedures and restricted keyways. A restricted keyway means there are controls on its duplication and availability, and procedures are addressed in a Key Control Plan. A Key Control Plan is required for all explosives magazines, not just for high explosives. The plan must show how security will be maintained and how access to explosives and raw material will be controlled. Unlike the Security Plan or Fire Control Plan, the Key Control Plan must be in place, but it does not need to accompany the licence application or renewal.

1.0 REQUIREMENTS

Section 153(1) under Part 6 of the Explosives Regulations, 2013 provides the requirements of the Key Control Plan. A Key Control Plan must include the following:

1. every key to the magazine must be numbered;
2. a person may only have possession of a key to the magazine if they are named in the plan;
3. the number of people named in the plan must not exceed the number necessary for the operation of the magazine;
4. the lock on the magazine must be of a type for which keys can be obtained only from the lock's manufacturer or a certified locksmith designated by the manufacturer; and
5. each key must be kept in a locked and secure location when it is not in the possession of a person named in the plan.

The plan must be updated to reflect any change in circumstances that could adversely affect the security of the magazine and, if a key is lost or stolen, the lock must be immediately replaced.

2.0 CONTENTS OF A KEY CONTROL PLAN

Part II, Section 5.0, Key Control, in the Storage Standards for Industrial Explosives, May 2001, provides some details on what should be included in a Key Control Plan while Appendix B in Part I provides a list of acceptable locks meeting the requirements for the key itself. There is no specific format for the plan; however, all the listed requirements must be addressed.

2.1 Keys

Every key must have a number that is used to issue keys from a locked and secure location to an individual listed in the plan. The number must not be the serial number issued by the manufacturer as this must be removed as part of the security measures. The key can only be obtained from the manufacturer or copied by a certified locksmith designated by the manufacturer.

2.2 Locked and Secure Location

All keys must be kept in a locked and secure location when not being used. While a key may be issued for the work day due to access requirements, it must be returned to the secure location prior to leaving for the day. In cases where access is infrequent, obtaining and returning the key each time access is required is appropriate. Access to the keys must be limited to those permitted to possess them by card or code access or by another means of ensuring the key cannot be accessed by someone not permitted. How access is controlled needs to be included in the plan.

Key Control Plan

2.3 Persons Named in the Plan

The plan must include the names of those persons permitted to have access to the keys and thus the explosives. The number of persons named in the plan must not exceed the number reasonably required to efficiently operate the magazine(s). In the case of types E, I, and D explosives, the person named in the plan must be security screened and have an approval letter or equivalent document.

2.4 Lost, Stolen, or Misplaced Keys

If a key is lost or stolen, the lock must be replaced immediately. A key that has been misplaced and is later found should also require the lock to be replaced. The plan must detail the process to follow when replacing a lock due to lost, stolen, or misplaced keys.

3.0 ADDITIONAL CONSIDERATIONS

Section 2.0 provides details on what the Key Control Plan must include. Additional things to consider are:

1. assigning someone to review the plan on a regular basis to ensure it is up to date; and
2. providing training to ensure everyone is familiar with the plan and its procedures.

