

AMSA newsletter

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Ammonia Code of Practice Update – A closer look at security requirements in the Code of Practice

With the mandatory audit phase underway, it is a good opportunity to review in more detail how agri-retailers can meet the security requirements outlined in the Ammonia Code of Practice.

The Ammonia Code of Practice, launched by the Fertilizer Safety & Security Council, applies to all agri-retail facilities in Canada that store or retail anhydrous ammonia. All anhydrous ammonia retail sites in Canada will need to pass an audit and be fully compliant with the standards outlined in the Ammonia Code of Practice by the end of 2010.

Security for ammonia storage and handling

Retail facilities must ensure that access to ammonia is controlled at all times to deter theft and vandalism. As outlined in Section A4.1 of the Ammonia Code of Practice, there are three acceptable ways to meet the security requirements.

1) Fencing with a 6-foot chainlink fence topped by three strands of barbed wire is considered a best practice. While barbed wire is not mandatory, any fencing must be a minimum of six feet high. Page wire fencing must be topped with three strands of barbed wire to be compliant. Note that if fencing is used, there are emergency egress requirements.

2) Valve and tank securement is another option. It involves the locking of all valves and fittings which could provide access to ammonia, in addition to securing any portable tanks, such as using chains to lock nurse tanks to an immovable object. Valves are typically locked with chains or with special-purpose valve handle locks.

3) Other physical means of security such as professional security services with authorized and trained personnel to watch over the site is another acceptable way to comply. Agri-retailers can also have mobile equipment immo-

bilized (e.g. secured with chain or steel cable to an immovable object) plus brightly coloured cable ties on all valves to indicate tampering. Cable ties must be installed such that operating the valve would break the cable tie. Another acceptable system could be to have mobile equipment immobilized plus a security system with the following minimum elements: intrusion detection system (e.g. motion detector, detector strip in driveway) and camera actuated by the detection system. Ammonia equipment must be in the camera's field of view. Other means of security can be used as long as the approach both provides a physical means of preventing or deterring unauthorized access to anhydrous ammonia and is in place for all vessels at the storage operation.

Remember that the Ammonia Code of Practice incorporates the principle of "equivalency" which allows flexibility to meet or exceed safety and security levels established in the code.

Compliance & Enforcement Update

New Compliance and Enforcement Rules for Warehouse Sites in 2008

In 2008 AWSA announced new compliance and enforcement rules for sites who are offside with the standards. While our philosophy is to promote compliance through education and support, these steps were approved by our Board to ensure a level playing field and to ensure that no site management takes advantage of AWSA's policy which in the past has allowed a site to be non-compliant two years in a row without serious penalties.

As a reminder, if a site is found to be non-compliant, the following graduated series of fines and penalties will now apply:

First offence – the site must fix problem within three working days, otherwise certification is withdrawn, all manufacturers notified and the “no-ship” rule applies.

Second offence – (same protocol/same year) – a \$5,000 fine applies to be paid within 30 days, site must fix problem within three working days, otherwise certification is withdrawn, all manufacturers notified and the “no-ship” rule applies.

Third offence (same protocol/same year) – a \$10,000 fine applies to be paid within 30 days, site must fix problem within three working days, otherwise certification is withdrawn, all manufacturers notified and the “no-ship” rule applies.

Fourth offence (same protocol/same year) – certification withdrawn for one and one-half years, all manufacturers notified and the “no-ship” rule applies.

In 2008, four notices of violation were issued. All four were first offences and dealt with improper storage of agrichemicals. All sites need to ensure that they have sufficient space in certified buildings for all inventory.

As per usual, we will continue our enforcement follow-up program and our random site quality assurance checks in 2009.

AWSA and Provincial Co-operation

Last year AWSA had a request from Nova Scotia Environment to considering adding to our audit process the identification of a valid business operators' licence. We are always open to collaborating with the various provincial departments of environment and have advised them that we will add this additional step to our audit process for facilities in Nova Scotia.

As outlined in Technical Bulletin #30, in Nova Scotia the vendor (person) requires a provincial vendors certification (valid for 5 years) and the vendor (business) requires a business operators' certificate (renewed annually). Requirements for compliance with Protocol D9 vary by province. A complete summary can be found in AWSA Technical Bulletin #30 which is available on the AWSA website.

Contact AWSA

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New AWSA Board Members

It is a pleasure to confirm our recent voting and welcome to the AWSA Board two new members, both representing warehouse-ers: Lynne Sweeney, Director, Risk Management, Environmental Health & Safety, Richardson International Limited and Ian McNeill of UFA Co-operative Limited. Ian's current responsibilities at UFA involve management of crop protection products and seed supply and sales through their 38 locations across Alberta.

We are also pleased to have Richard Rose of NuFarm back on our Board...following a year's absence. Richard of course represents manufacturers on the Board. The AWSA Board composition consists of a blend of manufacturers, distributors and AWSA warehouse operators. The current board consists of:

Warehouseers

Don Henderson - Agronomy Company of Canada Ltd
Merle Hogey - Brussels Agromart Ltd
Gaston Gareau - Potatoes New Brunswick
Lynne Sweeney - Richardson International Limited
Ian McNeill - United Farmers of Alberta Co-operative Ltd

CropLife Manufacturers

Richard Rose - Nufarm Agriculture Inc
Keith Lockhart - Chemtura Canada Co.
Jim Wispinski - Dow AgroSciences Canada Inc
Stan Prokopchuk - Bayer CropScience Canada

Public Warehouses

Dwight Osiowy - Acropolis Warehousing Inc

Distributors

Rick Pierson - Univar Canada Ltd
Stephen Reid - Cargill Limited

Government

Janet McLean - Alberta Ministry of Environment

New AWSA Auditor

Last fall AWSA added a new Auditor to our ranks. Theo McCready, who hails from Saskatchewan, will be providing auditing support to AWSA warehouseers in Western Canada. Theo works with Grain Insurance and Guarantee Company. Complete contact for all AWSA auditors is available on the AWSA website at www.awsacanada.com

Update on Obsolete Pesticide Collection Programs

CropLife Canada in partnership with agri-retailers, farm associations and both federal and provincial governments, held one Obsolete Pesticide Collection Campaign across Canada in 2008. By all accounts the program was a huge success with over 50,000 kgs of obsolete agricultural pesticide collected and safely destroyed.

Manitoba completed a province-wide collection period over a 3-day blitz from Oct 21-23, 2008 with over 50,000 kgs (exact numbers are still being calculated) of product collected from 20 designated AWSA agri-retail facilities.

Looking ahead, there are province-wide collection programs scheduled for Ontario and Alberta (tentative on securing matching funding) commencing in the fall of 2009. The third phase of the British Columbia collection program (Peace Region) will coincide with the Alberta collection.

A special thanks to all of those individuals who allowed their facility to serve as designated collection points over the past year for this very worthwhile program.

Training Programs

Three training programs are available electronically for all warehouse operators. Specifically designed for AWSA, these courses offer you and your staff the opportunity to take online courses on WHMIS, Emergency Response and TDG.

Workplace Hazardous Materials Information System (WHMIS)

The WHMIS course is designed to protect the health and safety of workers by providing information to employers and employees about the hazardous materials that exist in their workplace. The course contains six modules covering training requirements, labels and Material Safety Data Sheets. The course can be taken online – or a CD version can be ordered from the AWSA office. Course information is available on the AWSA website at www.awsacanada.com.

Transportation of Dangerous Goods (TDG) Course

For those individuals who handle, offer for transport or transport dangerous goods in Canada, this training program on the new TDG Regulations is a must. This course applies to road and rail transport in Canada. The course is module based with built-in tests. Certificates can be printed out from each section for your records. The course can be taken online – or a CD version can be ordered from the AWSA office. Course information is available on the AWSA website at www.awsacanada.com.

Emergency Response

This informative course includes sections on forming an ER committee, detailed risk analysis, ER plan development and conducting emergency response drills – all specific to agrichemical warehouse operations. This course is available in CD format and can be ordered from the AWSA office. Course information is available on the AWSA website at www.awsacanada.com.

Certified Crop Science Consultant Program

The Certified Crop Science Consultant (CCSC) program is a national certification standard designed specifically by CropLife Canada and the University of Saskatchewan for industry professionals interacting and providing technical advice involving agricultural crop protection and plant biotechnology products.

Over the past several years the program has undergone several significant changes in an attempt to meet the increasingly complex needs of agricultural professionals, including an exclusive on-line study and certification format, as well as a continuing education component of the program to keep your certification current.

For more information about the CCSC program please visit: www.ccde.usask.ca/go/ccsc



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It is recognized that there may be several ways, and better ways, to meet a code requirement that is not described in the code or implementation manual.

All ammonia agri-retailers need to contact a certified ammonia code auditor to sign up for a

mandatory audit. For a list of our auditors please visit our website (www.fssc.ca). Prior to your audit, you should familiarize yourself with the Ammonia Code of Practice and accompanying implementation guide. Both are posted on the Fertilizer Safety and Security Council website.

To assist you with further questions and help prepare for your audit, a hotline has been established. Retailers can call toll-free (866) 311-0444 or direct (416) 260-2432 to speak with a representative about the program's implementation schedule, interpretation of code requirements or any other aspect of the program.