Dangerous Goods

Security sensitive substances

Ammonium nitrate – storage >

This information bulletin is designed to outline the minimum requirements to obtain a licence to store Security Sensitive Ammonium Nitrate (SSAN). It should be read in conjunction with bulletin 04.07.01 – glossary of terms.

General

This bulletin is designed for businesses that store any quantity of (SSAN). This may include manufacturers, the mining industry, agricultural and mining suppliers, importers and exporters.

Educational, research and analytical laboratories **will not** be exempted from the new security regulations and **will** require licensing.

This bulletin addresses security issues. Storage of SSAN must also meet safety requirements as outlined in the Northern Territory legislation and you should also take note of relevant product safety data sheets.

Requirements

To obtain a licence to store SSAN, a security plan must be submitted to NT WorkSafe for approval. (The licence to store may also authorise the purchase, sale or use of SSAN, depending on the nature of the business.)

The security plan will begin with a security risk assessment, to provide information to the regulatory authority about current security measures and about the risk of theft, unexplained loss, sabotage and unauthorised access.

The security plan will provide information to the regulatory authority about how you will meet security requirements. The minimum security requirements are:

1) SSAN must be kept in a secure store;
2) there must be procedures for controlling access to this secure store;
3) there must be procedures for checking and authorising persons with unsupervised access to SSAN, including
   a) designating a responsible person to maintain the security plan,
   b) instruction of workers on the security plan procedures,
   c) ensuring people with unsupervised access to SSAN have had security checks;
4) record keeping to reconcile incoming and outgoing quantities of SSAN and to ensure that SSAN is obtained from an authorised person and removed by an authorised person; and
5) procedures for reporting to authorities any unexplained loss, theft, attempted theft or any other security incident involving SSAN.

The security plan

Security risk assessment

A security risk assessment is a necessary preamble to developing a security plan. This assessment will describe existing security measures and examine the level and type of security risks to your particular business. In clarifying those risks it is necessary to consider outside threats (terrorists, criminals, protest groups) and also the security risk from staff or contractors who have access to your premises and SSAN. You should consider whether current security arrangements leave the SSAN vulnerable to theft or sabotage, and consider security improvements appropriate to manage the assessed risk. Security risk assessments should be reviewed periodically, particularly after security incidents.

Security Plan

The security plan will describe how you will meet the minimum requirements and any other security measures to be introduced.

The security plan will have three main elements:

1. *personnel management*
2. *site security*
3. *procedures*

1. Personnel management

Minimum requirement 1: List of authorised persons
The security plan must contain a list of all those who will have unsupervised access to SSAN. This will include the licence applicant. These people will be required to undertake a security check and, after clearance by the regulatory authority, will be authorised under the security plan to have unsupervised access to SSAN.

Minimum requirement 2: Staff recruitment
The security plan should include the provision for adding new workers to the list of authorised persons.

Should the licence holder wish to add new workers to the list these persons will be required to undertake a security check and, when cleared, can be added to the security plan in the form of a dated amendment to the list of authorised persons.

Minimum requirement 3: Maintaining the security plan
The security plan must include the nomination of a responsible person/security manager to implement and maintain the security plan, including the instruction of workers in the relevant access controls, recording procedures and reporting of security incidents.

2. Site Security

Minimum requirement 4: Details of your secure storage arrangements for SSAN
The security plan must contain details of your secure storage facility, including type and dimensions of structure, number and type of doors and windows, type of lock etc.

SSAN must be in a secure store under lock and key or constant surveillance – refer to definitions information bulletin 04.07.01.

Ideally, a suitable padlock should be pick protected and shackle protected (e.g. concealed shackle using case hardened steel body with raised shoulders) and not be re-keyable.

Ideally a padlock should also be bolt cutter resistant and have protection against the lock being drilled out. Further information regarding padlock specifications and locksets for doors in buildings can be found in Australian Standards AS 4154.4 – 2002 and AS 4154.2 – 1993 respectively.

Intermediate bulk containers (IBCs) in the open
As an exception to the above requirement, IBCs are permitted in open-air/uncontained/outdoor compounds as long as:

- the IBCs are sealed with tamper proof seals so that theft of product is easily detectable; and
- a security fence is in place. (The chain wire part of the fence should be at least 2000 mm high and separated from the nearest IBCs by at least 3000 mm. It should be galvanised with both selvedge's twisted and barbed, capped with three rows of barbed wire at 150 mm spacing. Further information on construction details can be obtained from AS 1725 – 2003 – "Chain-link fabric security fences and gates".)

3. Procedures

Minimum requirement 5: Controlling access to the secure store
Procedures for supervised and unsupervised access to the secure store of SSAN must be developed and checks put in place to monitor the effectiveness of these controls.

- persons having unsupervised access to the secure store should be clearly identified in the security plan. These people will require a security check. They may supervise the access of others to the secure store or the defined security area.
- a 'key plan' should exist that identifies who has access to the keys to the secure store and where the keys are securely kept.

Minimum requirement 6: Record keeping and inventory procedures
There must be systems and procedures in place to record:

- purchases/acquisitions and sales/supply of SSAN, to ensure that changes in custody occur only between licence holders;
- movements of SSAN into and out of the secure store, so that reconciliation is possible; and
- security incidents, including thefts, attempted thefts, unexplained losses, sabotage or attempted sabotage, break ins, attempted break-ins and any other security incidents, so that these incidents are recorded, investigated and reported to the regulatory authority and the police.

Additional voluntary measures

Licence holders may wish to consider implementing other voluntary security measures in addition to the *minimum* requirements outlined above. Additional security measures may deter, detect or delay a potential offender, and the following should be considered.

One important factor is the location of the facility. If the location is in close proximity to population centres or critical infrastructures, such that a potential explosion caused by sabotage could lead to a disaster, serious consideration should be given to:

- reducing storage quantities and/or stack sizes and
- increasing security measures beyond the minimum requirements, so as to deter, detect and prevent after-hours intrusion.

(On the other hand, the minimum requirements outlined may not be required in exceptional circumstances when equivalent security outcomes can be achieved by alternate measures, e.g. extremely remote location. In this case the security plan must justify the departure from the above minimum requirements.)

Additional measures could improve perimeter protection, stopping intruders at the edge of a facility's property long before they reach vital assets and operational areas. Measures to control the movement of people within the general facility can also greatly enhance security. Additional measures could include:

Physical security

- post "No Trespassing" and "Authorised Access Only" signs
- upgrade fences with barbed wire
- install bollards and trenches that prevent vehicles from driving into the site at points other than official entrances
- vehicle gates with retractable barriers
- personnel gates and turnstiles
- lighting that makes it easier for employees and even passers-by to observe and possibly identify intruders
- employ natural surveillance by arranging reception, production, and office space so that unescorted visitors can be easily noticed
- install appropriate locks on exterior and interior doors
- install appropriate, penetration-resistant doors and security hinges
- install secure windows with appropriate locks
- install electronic security measures such as motion sensors, monitored alarms and CCTV

Procedures

- establish a system for determining which cars, trucks or rail cars may enter the site, through which gates, docks or other entrances, and under what conditions. Such a system may be part of the pedestrian access control system, relying on access cards carried by vehicle operators, or it may be an independent system relying on staffed security posts
- require visitors to be signed in and escorted
- pay close attention to access control at loading and unloading areas

The appropriate level of security can vary significantly from facility to facility. It depends on the number of employees, the level of pedestrian and vehicular traffic into and out of the facility, the attractiveness of the facility as a target of various threats, the proximity of the facility to populated areas, and many other factors.

Further information

For further information please contact:

NT WorkSafe >

GPO Box 1722

Darwin NT 0801

Telephone: 1800 019 115
Facsimile: (08) 8999 5141
Email: ntworksafe@nt.gov.au
Website: www.worksafe.nt.gov.au