



Estes-Cox Corporation

1295 H Street • PO Box 227 • Penrose, CO 81240-0227
Phone: 719.372.6565 • Fax: 719.372.3217

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Via email to: canmet-erd@nrca.gc.ca

Telephone: 613-948-5170

Facsimile: 613-948-5195

Christopher G. Watson
Chief Inspector of Explosives
Explosives Regulatory Division
Natural Resources Canada
1431 Merivale Road
Ottawa, Ontario K1A 0G1 Canada

Subject: Proposed Explosives Regulations published in the Canada Gazette, Part I, March 17, 2012

Dear Chief Inspector Watson,

The purpose of this letter is to provide comments concerning the proposed explosives regulations published in the Canada Gazette, Part I, March 17, 2012.

To begin, we wish to extend a thank you to the personnel at the Explosives Regulatory Division for the very comprehensive and easy-to-follow 20 part revision of the Explosives Regulations.

We are especially appreciative and pleased that sport rocketry is to be regulated as a separate entity and has been removed from fireworks regulations.

Additional technical comments are enclosed. Again, a special thanks to all for your work and for giving interested parties the opportunity to review the revisions and comment.

Kind Regards,

Mary Roberts
Manager,
Estes-Cox Corp. Technical Services
Member,
NFPA Pyrotechnics Committee



Technical comments are as follows:

Part 1, Div. 6. Add a definition:

“In-transit” means *being moved into, through and out of Canada.*

Substantiation: Because Part 4 provides requirements for “in-transit” permits for explosives, a definition of “in-transit” as used in the regulations would be helpful to define when an “in-transit” permit is necessary. Otherwise the broader definition found in dictionaries seem to make Part 4 applicable to ALL explosives being transported into, within, or out of Canada

Part 3, Div. 28. (n) Recommend revising as follows:

(n) The safety instructions, in both English and French, that will accompany the explosive, including procedures for preventing accidents when handling, storing, using or destroying the explosive and the procedures to follow if the explosive is lost or stolen, when appropriate and required; and

Substantiation: If 25 kg of TNT are stolen from a magazine, it should be reported to authorities immediately due to its destructive potential but if a rocket hobbyist loses a few model rocket igniters or a small model rocket motor in the grass while at the launch site, it should not require reporting. Model rocket manufacturers generally do not provide reporting information on packaging or in instructions. Warnings are provided on motor casings in case an individual finds a model rocket motor. Instructions for disposal are provided on the motor or in its instructions.

Part 3, Div. 30. (g) Suggest revising as follows:

(g) The method to be used to destroy any of the explosive that is not used or kept in one’s possession when leaving Canada.

Substantiation: The revision would provide the option for rocket hobbyists participating in an international competition in Canada to take any remaining model or high power rocket motors back to their country with them rather than destroying them.

Part 4, Div. 45 Table, Item 1. Suggest revision as follows:

1. Model rocket motors that each have a maximum total impulse of 160 Newton-seconds (NFPA alpha designations A to G as indicated on the motor or its packaging.)

Substantiation: The exemption would cover all motors defined as “model rocket motors”, allowing model rocket hobbyists to import in their possession a small number of F or G size model rocket motors for their personal use without having to apply for a permit.

Part 4, Div. 47 (4)(a) Recommend revising as follows: