



## NATIONAL ASSOCIATION OF ROCKETRY

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May 21, 2012

Dr. Christopher Watson  
Director and Chief Inspector of Explosives  
Explosives Safety and Security Branch  
Department of Natural Resources  
1431 Merivale Road  
Ottawa, Ontario  
K1A 0G1

Dear Dr. Watson:

This letter provides comments from the National Association of Rocketry (NAR) of the United States concerning the draft explosives regulations published in the Canada Gazette on March 17, 2012. The NAR has numerous members in Canada who fly rockets there, and we have reciprocity of recognition with the Canadian Association of Rocketry (CAR) for certification of rocket motors for consumer use and for user certification of rocketeers who fly high-power rockets. We are the oldest consumer rocketry organization in the world, having been founded in 1957.

Our comments are few because many of the details of vendor licensing and marking of product for sale in Canada have little impact on us, as long as the product remains available to consumers. We do note three specific points of concern, however:

1. The safety code or list of safety measures for using rockets at the Table on page 686-687 of the Gazette is quite different from the current CAR Safety Code, and the differences will provide confusion for US fliers who wish to attend and fly at a CAR launch. In particular, the hard restriction to not fly a model rocket within 9 km of an airport of any type in the regulations will be very limiting to consumers and is found in U.S. regulations only for high-power rockets, not model rockets.
2. The restriction on sale of model rocket motors above 40 N-sec total impulse to persons under the age of 18 in paragraph 319 is not comparable to the restrictions in the U.S. from our Consumer Product Safety Code (16CFR1500.83) which has set this threshold at 80 N-sec. This higher limit has found to be fully satisfactory from a safety standpoint for the

30 years that it has been in effect, and permits the use of motors that are quite common in international youth competition programs.

3. The threshold values for limiting storage of motors throughout the regulations appear to be based on total weight including inert materials such as casings and packaging, rather than being based on the propellant weight as is done in the U.S. Our motors in this hobby generally have very small fractions of propellant weight, so these weight restrictions in Canada would be very limiting compared to common (and fully safe) practice in the U.S.

Thank you for the opportunity to comment. You may reach me at [president@nar.org](mailto:president@nar.org) if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Trip Barber". The signature is written in a cursive, slightly slanted style.

Trip Barber  
President  
National Association of Rocketry