



## Dangerous Goods Safety information sheet

### Overview of SRS Regulations

#### *Introduction*

This document is for guidance only and the definitive statutory requirements are contained in the Dangerous Goods Safety (Security Risk Substances) Regulations 2007 (the SRS Regulations).

The basis for the SRS Regulations is the Council of Australian Governments (COAG) agreement of 25 June 2004 related to counter-terrorism measures.

Western Australia has developed dedicated security regulations for so-called security risk substances (SRS) rather than including them in the Explosives Regulations. This avoids confusion or inconsistencies between safety and security requirements for ammonium nitrate.

The requirements of the SRS Regulations are in addition to the requirements of the other dangerous goods safety regulations.

The following substances, other than Class 1 dangerous goods, are security risk substances (SRS) in Western Australia:

- solid mixtures containing more than 45% ammonium nitrate (AN); and
- ammonium nitrate emulsions, suspensions or gels.

*Note: This does not include single-phase, homogenous (as opposed to multiphase, heterogeneous mixtures) aqueous solutions of ammonium nitrate as commonly used in fertigation applications or as hot, concentrated solutions (UN 2426) for making AN emulsion explosives. However, it does include calcium ammonium nitrate (CAN), which is not a dangerous good under the UN classification system.*

#### *SRS licensing system (3 year renewal)*

Only specifically authorised persons may possess SRS and have unsupervised access to them. Authorised persons are either licence holders or so-called 'secure employees' of licence holders.

In order to obtain an SRS licence, a legitimate purpose must be demonstrated, such as:

- use for manufacture of commercial explosives and non-SRS products such as nitrous oxide;
- use in laboratories for research, teaching and testing; and
- fertiliser use by primary producers.

Licences are not issued for household use or fertilisation of recreational grounds (e.g. sports grounds, parks, gardens). The import, manufacture and sale of cold packs containing AN for first aid and camping uses, and any home garden fertilisers in solid form with more than 45% AN content is not allowed.

Licensed shotfirers and operators of mobile processing units (MPUs; licensed under the Explosives Regulations) do not need to be separately authorised to possess SRS. Anyone else requires one or more of the following three-year licences to possess or purchase SRS:

- SRS import/export licence;
- SRS manufacture licence (allows associated storage);
- SRS storage licence;
- SRS transport licence;

- SRS supply licence; and
- SRS fertiliser licence (combination licence for transport, storage and use).

Commercial, industry and educational laboratories are exempted from licensing for the storage and use of less than 3 kg of SRS per laboratory building.

Except for the SRS fertiliser licence, all SRS licences allow supply (i.e. no additional supply licence is necessary) and are in addition to any other licences required under the following dangerous goods safety regulations:

- Storage and Handling of Non-explosives (safety only);
- Road and Rail Transport of Non-explosives (safety only); and
- Explosives (safety and security).

SRS manufacture, storage, transport and fertiliser licences require a security plan as a precondition for obtaining the licence.

SRS licences are only issued to applicants in possession of a valid security clearance, as shown by a current dangerous goods security card.

A licence or authorisation as a secure employee is required for any unsupervised activity associated with SRS at any quantity.

A paper licence is issued to licence holders.

*Note: Licensed shottirers, fireworks operators, pyrotechnics (special use) licensees and explosives drivers are issued with a photo ID plastic licence under the Explosives Regulations.*

### ***Security clearance and dangerous goods security card for licence holders and secure employees (5 year renewal)***

Individuals who are licence holders and people with unsupervised access to SRS require a security clearance. The security clearance process is initiated by lodging an application form for a dangerous goods security card.

*Note: The application form is only available from participating Australia Post Offices. Ring 13 13 18 for participating offices. Guidance on the requirements for applying for a dangerous goods security card is available from the Resources Safety website.*

The security clearance process is conducted by the WA Police. It does not involve Resources Safety. The Chief Officer issues a dangerous goods security card on the advice of the WA Police.

The dangerous goods security card is a plastic photo ID card that is valid for five years from the date of issue. A current card is proof of security clearance and is transferable between employers.

The card by itself is not an authority to be in possession of SRS, only a necessary precondition. The card holder also requires authorisation from their employer to have unsupervised access to SRS or explosives. This establishes that the employee has an operational need and the competence to have unsupervised access to SRS, and gives the employee the legal status of a 'secure employee'.

It is an offence for an employer or secure employees to allow unsupervised access to SRS by an employee without a security clearance.

### ***Security plan***

SRS manufacture, storage, transport and fertiliser licences require a security plan as a precondition for obtaining a licence.

The content of a security plan is prescribed in the SRS Regulations, which require licence holders to develop a written document including a security risk assessment and other prescribed elements. SRS

security templates have been developed to assist industry, and are available from the Resources Safety website.

The licence holder and person representing the company as the responsible person for implementing the security plan are required to implement and comply with the security plan. The licence holder is required to promptly advise any change in the responsible person or contact details.

### Summary of SRS licensing system

SRS licence type	Scope of licence	Requirements of applicant	Comments
<b>Import / export</b>	Import and export of SRS from overseas by sea or air	An SRS import notice at least 7 days before arrival of SRS and an SRS export notice at least 7 days before export Each import/export notice must be accompanied by a material safety data sheet (MSDS) and a certificate of analysis	All requirements of the Goods in Ports Regulations are additional (e.g. special berth approvals)
<b>Manufacture</b> Site specific licence.	Allows manufacture of SRS at a fixed plant and associated storage of SRS.	Security plan	Required for manufacture of AN emulsions, suspensions and gels, intermediates for blasting explosives UN 3375, AN plants and some fertiliser manufacture Not required for the manufacture of fertiliser solutions, nitrous oxide or any other non-SRS substances.
<b>Storage</b> Site specific licence.		Security plan	At over 10 tonnes, a licence under the Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007 is required.
<b>Transport</b>	Allows prime contractor to transport SRS Person from another State or Territory with an equivalent interstate licence may operate without a Western Australian licence	Security plan Drivers must have dangerous goods security card	Transport to comply with the Australian Dangerous Goods Code and licensing requirements of the Road and Rail Transport of Non-explosives Regulations No co-transport of explosives allowed
<b>Supply</b>	Allows sale and supply only	Detailed sales records to be kept Must not sell to anybody who is not authorised by a licence or authority to purchase	Must seek proof of identity of purchaser via photo ID and evidence of authority to purchase

SRS licence type	Scope of licence	Requirements of applicant	Comments
<b>Fertiliser</b> Site specific licence.	For the purchase, transport, storage and use of AN fertiliser by primary producers in unlimited quantities for own use only	Security plan	Exempt from licensing under Storage and Handling of Non-explosives Regulations Dangerous goods transport licence may be required Does not allow explosives use, storage or transport

*Note:*

- All licences authorise the possession, supply (except fertiliser licence) and purchase of SRS.
- All holders of personal licences must be 18 years or older.
- All licences are valid for three years.
- All licences require security clearance of individuals.

*Treatment of shotfirers in respect to SRS licences*

A shotfirer, who is licensed under the Explosives Regulations, may possess SRS without additional SRS licences. However, a valid dangerous goods security card is still required to obtain a shotfirer licence.

A licensed shotfirer may transport unlimited amounts of SRS without an additional SRS licence as long as the SRS is for his or her own use. However, like the primary producer operating under an SRS fertiliser licence, the licensing requirements of the Road and Rail Transport of Non-explosives Regulations apply.

A licensed shotfirer only requires an SRS storage licence for quantities above 100 kg. The licence is not required if the SRS is stored as part of an explosives storage licence in an explosives magazine. Under this arrangement, the SRS is regarded as an explosive with half the net equivalent quantity of TNT.

*Supervised and unsupervised access*

The SRS Regulations define 'supervised access' by a person to a SRS as:

*'an individual is supervised by another person while he or she has access to an SRS if at the time he or she –*

- (a) is in the presence of; or*
- (b) is in a place where any handling or removal of the SRS is controlled by, the other person.'*

For example, a person involved in the loading or unloading of security-sealed freight containers containing an SRS would be considered 'supervised' if the site is provided with perimeter security and the supervising person (who is a secure employee) checks the security seals on all SRS freight containers immediately prior to them leaving the site.

Information on this topic is provided in a Resources Safety information sheet on the meaning of 'controlled by the other person'.

*Transitional provisions*

The SRS Regulations allow a 12-month grace period for people to lodge licence applications, starting from 1 March 2008 (the proclamation date).

*Further information*

Guidance material, including national guidance notes for the security of ammonium nitrate, is available from the Resources Safety website.