Annex BBB

Health Canada Santé Canada

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GUIDANCE DOCUMENT

Building and Production Security Requirements for Marihuana for Medical Purposes

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FOREWORD

Guidance documents are meant to provide assistance to industry and health care professionals on how to comply with governing statutes and regulations. Guidance documents also provide assistance to staff on how Health Canada mandates and objectives should be implemented in a manner that is fair, consistent and effective.

Guidance documents are administrative instruments not having force of law and, as such, allow for flexibility in approach. Alternate approaches to the principles and practices described in this document may be acceptable provided they are supported by adequate justification. Alternate approaches should be discussed in advance with the relevant program area to avoid the possible finding that applicable statutory or regulatory requirements have not been met.

As a corollary to the above, it is equally important to note that Health Canada reserves the right to request information or material, or define conditions not specifically described in the document, to allow the Department to adequately mitigate the risk of diversion of controlled substances to an illicit market or use.

This document should be read in conjunction with the relevant sections of other applicable guidance documents and the *Directive on Physical Security Requirements for Controlled Substances*.

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1. Purpose

The document is intended to help Licensed Producers (LPs) comply with Division 3 security measure requirements of the *Marihuana for Medical Purposes Regulations* (MMPR) which include general security measures, and security measures for the perimeter of site and areas within a site where cannabis is present.

LP's should note that this guidance document **does not** apply to the storage of dried marihuana, marihuana seeds and cannabis used solely for the purpose of testing in order to determine the percentages of cannabinoids in dried marihuana. The security measures for the storage of these substances can be found in Health Canada's *Directive on Physical Security Requirements for Controlled Substances* (Security Directive). The Security Directive establishes realistic minimum security standards for the **storage** of controlled substances and applies to dried marihuana, marihuana seeds, and to cannabis used solely for the purpose of conducting in-vitro testing in order to determine the percentages of cannabinoids in dried marihuana (both packaged and unpackaged). In addition to the requirements included in the Security Directive, there are specific outcome based requirements set out in Division 3 of the MMPR. These requirements aim to prevent unauthorized access to your site and to restrict and monitor access to areas within your site where cannabis is present.

It is the LP's responsibility to ensure that provincial, municipal and federal legislation including building and fire codes are complied with. Health Canada's Office of Controlled Substances is the authority responsible for licensing and compliance monitoring under the *Controlled Drugs and Substances Act* (CDSA) and MMPR.

2. Background

The safeguarding of controlled substances is an issue that confronts all manufacturers, distributors, practitioners, pharmacists, law enforcement and government. Health Canada limits the handling of these substances through policies, guidelines and legislation such as the CDSA, the *Narcotic Control Regulations* (NCR) and the MMPR. Cannabis, its preparations, derivatives, and similar synthetic preparations as listed under Schedule II of the CDSA are included in the definition of a controlled substance. Those wishing to engage in lawful activities must, therefore, be properly licensed and ensure that the controlled substances are adequately secured and safeguarded at all times for public safety and to minimize risks of diversion.

3. Scope

This guidance document is applicable if you are interested in producing marihuana for medical purposes or want to engage in any other regulated activity set out in the MMPR. These guidelines outline regulatory requirements and include examples of security measures that you can put in place for both building construction and electronic systems. The Procedures section of this document will assist you on how to meet these requirements. Furthermore, it is the LP's responsibility to ensure that provincial, municipal and federal legislation including building and fire codes are complied with.

This guidance document does not apply to licensed dealers under the *Narcotic Control Regulations*, the *Benzodiazepines and Other Targeted Substances Regulations*, and Part G or Part J of the *Food and Drug Regulations*.

Please note that all waste cannabis material from cultivation or production is considered to be a controlled substance with the exception of mature cannabis stalks that do not include leaves, flowers, branches or seeds; and fibers derived from the stalks as well as any non-viable cannabis seeds as per Schedule II of the CDSA. Waste cannabis material that is a controlled substance must be secured in accordance with the CDSA and as outlined in Health Canada's *Directive on Physical Security Requirements for Controlled Substances* (Security Directive) until destroyed.

4. Procedures

As part of the application to become a LP, you must provide a detailed description of the security measures at the proposed site, in accordance with Division 3 of the MMPR and the Security Directive, published by Health Canada, as amended from time to time. It is up to you to determine potential security risks at your site and to design and implement appropriate security systems and protocols to meet the regulatory requirements outlined above. Health Canada officials will review your security proposal as part of their consideration of your application. It is important that you seek appropriate professional advice before undertaking any construction work.

The security of your site and of the areas within your site where cannabis is present does not end with the design and construction. Security requirements detailed in the regulations require your attention on a continual basis. It is the ongoing responsibility of the LP to ensure that all requirements for securing their site, areas within their site where cannabis is present and the storage of cannabis and any activities relating to the production of marihuana for medical purposes (as per their licence) are met.

In addition, it is the responsibility of the LP to ensure that provincial, municipal and federal legislation including building and fire codes are complied with.

5. Specific Regulatory Provisions in Division 3 of the MMPR

In this section, specific regulatory provisions from the MMPR are reproduced in bold and italicized text, followed by guidance on how these regulatory provisions can be met.

5.1 Regulatory Provisions Relating to Securing Your Site

MMPR s41	***A licensed producer must ensure that the security measures set out in Division 3 are carried out.***
MMPR s42	***The licensed producer's site must be designed in a manner that prevents unauthorized access.***
MMPR s47	***Those areas [within a site where cannabis is present] must include physical barriers that prevent unauthorized access.***

Guidance: Signage and Physical Barriers

If your site is a stand-alone building, or a space within a building that shares walls, then physical barriers and signage posted at the perimeter and entrance to your building/space can assist in ensuring that your site is secure. The main purpose is to prevent unauthorized access and to act as a definite demarcation. Physical barriers are required for securing all areas within a site where cannabis is present. Physical barriers should provide sufficient resistance to impede unauthorized access to the premises where cannabis is present.

For example, a physical barrier of some kind (e.g. a fence surrounding the site) and a sign stating that it is private property or a restricted area and that unauthorized access is prohibited are appropriate.

Guidance: Entrances, Doors and Frames

Minimizing the number of entranceways to the site and areas within a site where cannabis is present will assist in securing and monitoring the space; however, it should remain consistent with fire and building safety codes. Securing all entrances to the building, site or areas within a site where cannabis is present would prevent unauthorized access.

For example, entranceways to areas within a site where cannabis is present could be equipped with commercial steel doors and frames. Doors may be specified as fire rated where required. The doors could also be equipped with the appropriate locking hardware, door closers, contact switches, and electronic access control mechanisms, to assist in providing appropriate security against unauthorized access.

Keeping your entranceways closed and locked to the extent possible given your business operations can assist in ensuring that your site and areas within a site where cannabis is present are secure.

Keeping doors and entrances to the areas within your site where cannabis is present closed at all times with an operational intrusion detection system on (alarm system that operates at all times) would further prevent unauthorized access.

Guidance: Openings, Ducts and Mechanical/Electrical Pass-Throughs

Minimizing the number of openings, ducts and pass-throughs in your site and areas within your site where cannabis is present will assist in preventing unauthorized access.

Protecting all other openings with security screens, steel bars or equivalent material, welded to steel frames will assist in preventing unauthorized access to your site. The screens and bars are most effective in preventing unauthorized access including quick entry, grab and exit type intrusions.

Where appropriate to accommodate pipe or conduit movement or expansion, pipes and conduits can be enclosed in a close-fitting sheet metal sleeve and fastened to a frame to provide appropriate security.

Guidance: Wall Construction

The walls of your site should be constructed to assist in ensuring that unauthorized access to your site and areas within your site where cannabis is present is prevented.

For example, slab-to-slab construction and steel mesh sheets attached to the underside of structural joists can assist in ensuring wall security.

Guidance: Glazing Panel Security

Appropriate use of glazing panels can assist in ensuring that unauthorized access to your site is prevented.

For example, any glazing panels used in roofing (in a greenhouse for example) should be attached directly to the roof structure in such a manner as to preventing removal from the outside.

Building security can be further ensured by using appropriate electronic equipment to monitor glazing elements, including sensors that can detect breakage of glazing panels.

Mechanisms that can provide secure monitoring of glazing elements include at least one of the following:

- Glass-break sensors of sufficient number may be appropriately installed to provide 100% coverage of the glazing area.
- Electrically conductive foil or wire can be incorporated in the glazing elements to provide detection of breaks.
- Volumetric or beam-break detection systems can be employed to provide 100% coverage of the interior surface area of the glazing.

5.2 Regulatory Provisions Relating to Monitoring and Detection

Perimeter of the Site

MMPR s43. (1)	***The perimeter of the licensed producer's site must be visually monitored at all times by visual recording devices to detect any attempted or actual unauthorized access.***
MMPR s43. (2)	***The [visual recording] devices must, in the conditions under which they are used, be capable of recording in a visible manner any attempted or actual unauthorized access.***
MMPR s44.	***The perimeter of the licenced producer's site must be secured by an intrusion detection system that operates at all times and that allows for the detection of any attempted or actual unauthorized access to or movement in the site or tampering with the system.***
MMPR s45.(1)	***The system must be monitored at all times by personnel who must determine the appropriate steps to be taken in response to the detection of any occurrence [of attempted or actual unauthorized access].***
MMPR s45.(2)	***If any such occurrence is detected, the personnel must make a record of: the date, time of the occurrence; and the***

measures taken in response to it and the date and time when they were taken.

Areas Within a Site Where Cannabis is Present

MMPR s48.(1) ***Those areas [within a site where cannabis is present] must be visually monitored at all times by visual recording devices to detect illicit conduct.***

MMPR s48.(2) ***The devices must, in the conditions under which they are used, be capable of recording in a visible manner illicit conduct.***

MMPR s51.(1) ***The intrusion detection system must be monitored at all times by personnel who must determine the appropriate steps to be taken in response to the detection of any occurrence [of illicit conduct, any attempted or actual unauthorized access to or movement in those areas or tampering with the system].***

MMPR s51.(2) ***If any such occurrence is detected, the personnel must make a record of: the date, time of the occurrence; and the measures taken in response to it and the date and time when they were taken.***

Guidance: Video Coverage

Visual monitoring of the perimeter of your site, as well as the areas areas within your site where cannabis is present can be achieved using closed circuit video equipment (CCVE). Appropriate lighting equipment in conjunction with CCVE can assist in the detection, classification, assessment, and recognition of the images recorded.

Camera should be in sufficient number and appropriately located to cover the area to be monitored.

Guidance: Redundancy and Back-Ups

Keeping all cameras recording 24/7, and having appropriate back-up mechanisms in place can achieve the appropriate coverage to detect illegal activity, unauthorized access and any attempts to breach the security of your site and of the areas within your site where cannabis is present.

Back-up mechanisms must ensure that all visual recordings and records of a detected occurrence be retained for two years. These back-up mechanisms may include storing the visual recordings on multiple media devices.

5.3 Regulatory Provisions Relating to Access Control

MMPR s42.	***The licensed producer's site must be designed in a manner that prevents unauthorized access.***
MMPR s46. (1)	***Access to each area within a site where cannabis is present must be restricted to persons whose presence in the area is required by their work responsibilities.***
MMPRP s46.(2)	***The responsible person in charge or, if applicable, the alternate responsible person in charge must be physically present while other persons are in those areas.***
MMPR s46.(3)	***A record must be made of the identity of every person entering or exiting those areas.***

Guidance: Securing access to the site perimeter and areas within a site where cannabis is present

There is a wide range of appropriate electronic access control systems, including intrusion detection mechanisms and CCVE that may be employed to ensure that access to the site, and areas within the site where cannabis is present, is restricted to the appropriate personnel and that a record is kept of each person entering or exiting those areas.

The system that you install must be capable of identifying each individual who enters or leaves restricted areas to comply with regulatory requirements. A personal identification number (PIN) credential system alone is not sufficient for access control because PINs can be purposefully or inadvertently disclosed.

For example, a security system that requires a PIN and an identification card, or biometrics and visual monitoring are examples of ways to prevent both unauthorized access to those areas within a site where cannabis is present, and keep track of the movements of personnel that enter and leave those areas.

Guidance: Security System Control Mechanisms

Steps should be taken to ensure the appropriate control of codes, keys, combinations and other elements of your security system.

For example, to ensure appropriate security, only senior personnel including the senior person in charge, the responsible person in charge and any alternate responsible persons in charge should have access to alarm codes, vault combinations and other security elements for the site. Changing combinations and codes on a regular basis and when there are any changes with any senior personnel will assist in ensuring appropriate control of the security system.

5.4 Regulatory Provisions Relating to Intrusion Detection

Perimeter of the Site

MMPR s44. ***The perimeter of the licenced producer's site must be secured by an intrusion detection system that operates at all times and that allows for the detection of any attempted or actual unauthorized access to or movement in the site or tampering with the system.***

MMPR s45.(1) ***The system must be monitored at all times by personnel who must determine the appropriate steps to be taken in response to any occurrence of an attempted or actual unauthorized access to or movement in the site or tampering with the system.***

MMPR s45.(2) ***If any such occurrence is detected, the personnel must make a record of: the date, time of the occurrence as well as all measures taken in response to it and the date and time when they were taken.***

Areas within a site where cannabis is present

MMPR s49. ***Those areas [within a site where cannabis is present] must be secured by an intrusion detection system that operates at all times and that allows for the detection of any attempted or actual unauthorized access to or movement in those areas or tampering with the system.***

MMPR s51. ***The intrusion detection system must be monitored at all times by personnel who must determine the appropriate steps to be taken in response to the detection of any occurrence [of illicit conduct, any attempted or actual unauthorized access to or movement in those areas or tampering with the system].***

A robust intrusion detection system can assist in securing both your site and areas within your site where cannabis is present.

Guidance: Monitoring

Monitoring your site's perimeter and areas within your site where cannabis is present via an intrusion detection system with personnel in a central location will

allow your personnel to detect any unauthorized attempts to enter those areas; or to tamper with security equipment. Appropriately trained personnel will assist in responding to any incident involving detected unauthorized activity.

When there are no responsible personnel present, a link to a monitoring station will enable notification to the appropriate personnel and law enforcement.

A response plan should be designed to ensure quick action when detection has occurred.

Guidance: Records of Detected Matters

Keeping all cameras recording 24/7, and having appropriate back-up mechanisms in place can achieve the appropriate coverage to detect illegal activity, unauthorized access and any attempts to breach the security of your site and areas within your site where cannabis is present.

Back-up mechanisms must ensure that all visual recordings and records of a detected occurrence be retained for two years. These back-up mechanisms may include storing the visual recordings on multiple media devices.

Guidance: Tampering

The effectiveness of any system is dependent on the signal reaching the individuals responsible for the monitoring of the signal and the response to its warning. Depending on how the signal is carried, tampering with the line carrying the signal may result in the signal not reaching its intended destination. An acceptable system should be able to identify, record, and notify if the lines are tampered with or if an attempt has been made.

A response plan should be designed to ensure quick action when tampering occurs.

Guidance: Power Supply

In order to comply with regulations, your security system must include visual recording devices, access control and an intrusion detection system which must operate on a continuous basis.

For example, supporting your security system and all components (e.g., sensors, control units and communicators/enunciators, volumetric sensors, glass-break detectors, beam-break sensors) with an uninterruptible power supply sufficient for 24/7 continuous operation would effectively maintain the integrity of your security system.

5.5 Regulatory Provision Relating to Air Filtration

MMPR s50. ***Those areas [within a site where cannabis is present] must be equipped with a system that filters air to prevent the escape of odours and, if present, pollen.***

Guidance: Air Filtration

To assist in the prevention of the escape of pollen, odours, and other particles, all exhaust air from your cultivation area and other areas within your site where cannabis is present can be filtered through appropriate air filtration systems.

For example, a high-efficiency particle air filter such as a H13 HEPA filter can ensure appropriate ventilation and filtration of exhaust air.

Annex CCC

Health Canada Santé Canada

DIRECTIVE ON PHYSICAL SECURITY REQUIREMENTS FOR CONTROLLED SUBSTANCES

(Security Requirements for Licensed Dealers for the Storage of Controlled Substances)

OFFICE OF CONTROLLED SUBSTANCES
THERAPEUTIC PRODUCTS PROGRAMME
AMENDED DECEMBER 1999
(ORIGINAL VERSION FEBRUARY 1985)

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1. PURPOSE AND SCOPE

The following directive is intended to establish realistic minimum security standards, for the storage of controlled substances which are flexible enough to take into consideration advances in technology, changes in the drug scene, local problems, construction materials and construction expertise. It is also intended to assist licenced dealers in their own risk assessment when designing security which best meets their needs.

A variety of different secure structures will be accepted. Diversity, from a security point of view, is ideal as a thief with a knowledge of one company's security system will not be able to utilize this knowledge when trying to steal drugs from another company. These security requirements have been designed in such a way that a company can upgrade their security, should this be required, without going to a great deal of expense provided they have a good basic security system. This upgrading may be occasionally necessary due to the increased quantity of drugs being stored or the increased desirability of a drug by the illicit market.

This directive has been written for all licenced dealers, manufacturing or distributing controlled substances as well as for research scientists and analytical laboratories.

Licenced dealers' security, including manufacturers, distributors, analytical laboratories and research scientists, will be reviewed against this directive.

2. RISK ANALYSIS

In a risk assessment there are two major factors which must be considered, the consequence of the event and the probability of the events occurring.

(a) Consequence Of The Event To:

(i) Society - Through the adoption of the former Narcotic Control Act (repealed May 14,1997), the Food and Drugs Act and, most recently, of the Controlled Drugs and Substances Act, Parliament has determined that the consequence of controlled substances being available to the general populace, except on a regulated basis, is unacceptable. Cost to society of drugs reaching the illicit market includes, but is not limited to, police and court costs as well as a variety of health and social service costs.

(ii) Licenced Dealer - The licenced dealer's costs would be:

1) the loss of drugs
2) lost sales
3) time spent in investigations
4) lost credibility with health professionals, the consumers and their associations.

(b) <u>Probability Of The Events Occurring</u>

(i) Location - In some areas of the country there are professional thieves who possess the ability to open any vault, if they are given enough time. If these people are located close to a major drug sub-culture then they have a ready market and there is a reasonable probability that a company handling a drug desired by this sub-culture, will be attacked unless the thief believes that there is a very high probability that he will get caught before he can escape with the drugs.

Appendix a contains a list of cities and a stated radius from its centre. Any licenced dealer located within one of these designated areas must provide the security required for that area. Those cities listed in Region I were placed there by virtue of the number of drug thefts and drug losses which have occurred in that area.

It is anticipated that every two years this list will be revised and cities could be either added to or deleted from Region I and II. The Office, however, reserves the right to revise it more frequently, than every two years, if there has been a large increase in drug thefts and losses within a particular city.

(ii) Illicit Market Value - The illicit market value of a drug is an indication as to whether or not this drug has a high probability of being stolen. Appendix B contains the illicit price of drugs which the Office will be using in determining the type of security required at a licenced dealer. These values are a composite of the price paid in various parts of the country and the price paid at various stages of supply in the illicit market. To simplify this list, one price applies to all drugs in that range.

The Office does not envision changing the list showing the illicit market value of drugs more often than every two years unless there has been a marked change in the desirability of a particular drug.

When the threat to the drugs has been identified, the licenced dealer is in a position to decide how to obtain the maximum security benefit at the minimum cost. Some of the major areas of concern are as follows:

(iii) Robbery - If armed robbery during the daytime is the most likely form of theft, then there should be a method of rapidly notifying the police that a robbery is in progress. Thus, discussion should take place with the police force in the area in order to devise such a plan.

(iv) Pilferage - A small bottle of drugs can easily be slipped into a pocket and taken outside the building at coffee breaks, noon or at quitting time. The high value and ease of concealment make drugs an extremely attractive target. Thus there should be restricted admittance to the areas in which controlled substances are located.

(v) Theft - Good physical security will usually deter the professional thief because the odds are against him. An amateur may try to attack the system but he should be quickly apprehended if it was designed to withstand the attack of a professional.

3. SECURITY SYSTEM DESIGN

After completing a risk assessment, a security system can be designed which is commensurate with the value of the drugs being protected and the anticipated threat to the drugs.

By incorporating these security controls into the planning stages of the building a major reduction in both capital and operating costs can be realized and it will avoid costly upgrading at a later date should there be a need to increase the level of security.

It is unlikely that any large building can incorporate maximum operating efficiency and maximum security because these two requirements are sometimes, by their very nature, at variance with each other. At the same time it should also be remembered that human nature will render uncontrollable any unrealistic security restrictions. Thus one of the most important reasons for integrating security at the planning stage is a need to reduce the operational restrictions imposed by security requirements and eliminate those security requirements which may be considered by employees to be unrealistic. Careful planning can point out which operational procedures will be certain to generate major security hazards and will also show how a security system might cause major obstructions in the operational plan. How well these problems are identified and how they are resolved will determine the ultimate effectiveness of the security system. Thus the controls and requirements of the security system must be logical and not overly restrictive, if they are to be used by employees.

4. SOME CURRENT CONCEPTS IN SECURITY DESIGN

There are several security concepts which have been developed over the years. Each has its advantages and disadvantages when used in the context of licenced dealers who handle items which are generally small, easily portable and have a high illicit market value. As some of the advantages of these concepts can be beneficially incorporated into a company's overall security

they are outlined below:

(a) **Observation Concept** - This concept involves the positioning of the items of value in a location where they are under continual or casual observation. This concept has certainly a dissuasive effect because a thief does not like to be observed while breaking in.

The use of this concept by a licenced dealer would be when he has an office window looking into the vault area or the areas in which the orders are filled.

(b) **Split Target Concept** - This concept requires that the objects being protected are stored in several secure areas instead of in just one secure area. The advantage to this spreading around of the valuables is that the thief has to spend a great deal of time and energy trying to break into all of the secure areas in order to collect all of the valuables. An example of this split target type of security is a licenced dealer who builds two vaults and stores half of the drugs in each vault.

The disadvantage to this approach is the increased cost of construction, space requirements and the administrative cost of controlling access to two different locations.

(c) **Combined Target Concept** - This concept requires that all of the valuables be stored in one area and generally this results in minimizing costs because the cost of securing one large area is usually less than securing two or more areas. One large secure area also results in a lower cost of security maintenance.

(d) **Rings of Protection Concept** - This is a concept which, when properly designed, is very effective. Basically it requires the construction of various rings or barriers of protection around the items being protected. An alarm system is not a substitute for adequate physical security provisions. Good locks and doors, proper safes and vaults are required. The more barriers a would-be intruder must face, the greater the psychological deterrent. The more difficult and time consuming his task, the less likely he is to try or succeed in his efforts. The rings of protection concept is usually designed so that the intruder is detected when he surmounts the first barrier and the rest of the barriers are there to slow him down to such an extent that the police have arrived before he has departed with the drugs.

Each barrier should be constructed so that there are no weak areas to attack, otherwise the barriers will be useless in slowing down a professional thief. It is this concept which forms the basis for most of this Office's security requirements.

5. GENERAL REQUIREMENTS

(a) An acceptable security design should incorporate at least the following four levels of security:

(i) Uncontrolled licencee areas will provide a buffer zone which will give a clear indication to the public that ownership and therefore responsibility for behaviour in this space rests with the licencee;

(ii) Controlled licencee areas should be all areas of the building to which the general public (delivery personnel, customers, etc.) has access on a restricted basis, i.e. specific times of the day or night;

(iii) Restricted areas normally located in a restricted area which should only be accessible to employees with a need for access through general security areas; and

(iv) Secure areas are normally located in a restricted area in which is housed highly sensitive equipment and information as well as material to which access is restricted to authorized personnel.

(b) Intrusion Alarm System and Line Supervision

Each level of security as outlined in Appendix "C" and "D" requires detection equipment which will indicate when there is an unauthorized attempt to open, penetrate or remove the secure location in which controlled substances are stored. The effectiveness of an alarm system is dependent on the signal reaching the individuals responsible for the monitoring of the signal and the response to its warning. The signal is carried by a dedicated or leased telephone line and if this line is successfully tampered with, then a warning signal will not reach its intended destination and there will not be any response to the alarm. Thus, line supervision is the ability of a system to detect and sound an alarm if these lines are tampered with. Commencing with Level 4 (Appendix "C"), the minimum line supervision required is Grade "B".

APPENDIX "A"

LICENCED DEALERS GEOGRAPHICAL LOCATIONS

REGION I

Any location within a 100 km radius of the centre of any city experiencing, according to Office records, a large number of break and entry, armed robbery, pilferage, loss in transit and unexplained losses where the losses included controlled substances.

Areas which meet this criteria are as follows:

1. Toronto plus any location within 100 km radius
2. Montreal plus any location within 100 km radius
3. Vancouver plus any location within 100 km radius
4. Edmonton plus any location within 100 km radius

Cities such as Hamilton, Kitchener, and Victoria fall within the Region I because they are within 100 km of a city mentioned in Region I.

REGION II

Any location within a 50 km radius of the centre of a city experiencing according to Office records, significant numbers of break and entry, armed robbery, pilferage, loss in transit and unexplained losses where these losses included controlled substances.

The areas in this Region are:

1. Halifax plus any location within 50 km radius
2. Quebec City plus any location within 50 km radius
3. Ottawa-Hull plus any location within 50 km radius
4. London plus any location within 50 km radius
5. Winnipeg plus any location within 50 km radius
6. Calgary plus any location within 50 km radius
7. Windsor plus any location within 50 km radius

REGION III

Any location in Canada not in Region I or II.

APPENDIX "B"

Table 1 - **Prices to be Used in Determining the Illicit Value of Controlled Substances**

Table 2 - **Licenced Dealers Inventory Limitations**

TABLE 1
PRICES TO BE UTILIZED IN DETERMINING THE ILLICIT VALUE OF CONTROLLED SUBSTANCES

NOTE: These prices are calculated using a combination of the illicit market price for a finished product as well as for the raw material.

A. **$3,000,000/kg**

Alfentanil
Carfentanyl
Fentanyl
Sufentanil
Heroin
Etorphine
Hydromorphone

B. **$1,000,000/kg**

Cocaine
Levorphanol

C. **$250,000/kg**

Amphetamine
Hydrocodone
Methamphetamine
Oxycodone

D. **$100,000/kg**

Coca Leaves
Diphenoxylate
Ethylmorphine
Lysergic Acid
Diethylamide (LSD)
Meperidine (Pethidine)
Methadone
Flunitrazepam
Methaqualone
Morphine
Normethadone
Oxymorphone
Buprenorphine
Phencyclidine (PCP)
Pentazocine
Pethidine

E. **$50,000/kg**

Alphaprodine
Anileridine
Androgenic Anabolic Steroids
Diazepam
Codeine
Methylphenidate
Opium
Gamma-Hydroxybutyrate (GHB)

F. **$25,000/kg**

Benzodiazepines other than Diazepam and Flunitrazepam and excluding Clozapine and Olanzapine.

Butorphanol
Mescaline
Nabilone
Secobarbital
Nalbuphine
Pentobarbital
Psylocybin

G. **$15,000/kg**

Chlorphentermine
Phentermine
Diethylpropion

H. **$10,000/kg**

Amobarbital
Cannabis Sativa, its preparations, derivatives and similar synthetic preparations except Nabilone.
Phendimetrazine
Phenmetrazine

I. **$1,000/kg**

Barbitals
Clotiazepam
Ethinamate
Fencamfamin
Mazindol
Meprobamate
Pipradol
Ethchlorvynol
Fenproporex
Mefenorex
Methyprylon

J. **Research Drugs**

Any drug which is not listed above and is not a derivative of any drug listed in A to I above, will be valued at its commercial price or the price of drugs having similar pharmacological properties. The price to be used will be the higher one.

K. **Usual Wholesale Price**

All controlled substances not listed in A to I above will be priced at the usual price of the most commonly sold size. If the drug is being held as "raw material" the price used will be the usual commercial price of the material.

TABLE 2
LICENCED DEALERS INVENTORY LIMITATIONS

CATEGORY A	Region "I" Security Level	Region "II" Security Level	Region "III" Security Level
Licencee Holdings $150,000,001 and up	11	11	10
Licencee Holdings $31,250,001 to $150,000,000	10	10	9
Licencee Holdings $6,250,001 to $31,250,000	9	9	8
Licencee Holdings $1,250,001 to $6,250,000	8	8	7
Licencee Holdings $250,001 to $1,250,000	7	7	6
Licencee Holdings $50,001 to $250,000	6	5	5
Licencee Holdings $10,001 to $50,000	5	4	4
Licencee Holdings $0.00 to $10,000	4	3	3
***CATEGORY B**	**RESEARCHERS AND ANALYTICAL FIRMS - NO DISTRIBUTION**		
Licencee Holdings $2,501 to $10,000	3	3	3
Licencee Holdings $501. to $2,500	2	2	2
Licencee Holdings $0.00 to $500.	1	1	1

*** When the licencee's holdings exceed the maximum ($10,000), the security requirements of category "A" will apply.**

THE VALUE OF A LICENCEE'S HOLDINGS IS CALCULATED USING THE PRICES SHOWN IN THIS APPENDIX, (TABLE 1) MULTIPLIED BY THE MAXIMUM INVENTORY OF CONTROLLED SUBSTANCES ON THE PREMISES AT ANY TIME. ONLY DRUGS AND DRUG FORMULATIONS REQUIRING STORAGE IN A VAULT OR SAFE (SEE APPENDIX "D") NEED TO BE USED IN THE CALCULATION.

CATEGORY B IS LIMITED ONLY TO LICENCED RESEARCHERS AND ANALYTICAL FIRMS WHERE NO DRUG DISTRIBUTION IS INVOLVED.

APPENDIX "C"

STORAGE OF CONTROLLED SUBSTANCES

GENERAL

The following pages offer a description of the security levels 1 through 11 which are presented as the Office's minimum requirements for the different security levels. Appendix "D" identifies the types of drugs which will be allowed storage inside a steel caged area and also provides a description of the cage requirements. The Office will allow alternate methods of construction provided the penetration resistance is at least equal to the standard.

Laminates which are materials such as cement blocks, plywood, steel mesh, polycarbonates, etc., sandwiched together can be used effectively to offer a level of attack resistance which is at least equal to that of the traditional poured cement or cement block type vault. However, companies wishing to use laminates rather than the traditional cement vault, (due to weight problems, economic considerations, convenience, etc.) should consider discussing the proposed security with the person from the Office of Controlled Substances responsible for the assessment of physical security of licensed dealers in order to ensure that the force resistance is at least equivalent to the Office's minimum requirements.

SECURITY LEVEL - 1
Special Projects (Researchers)

1.1 General

1.1.1. The following are examples of the minimum requirements which the Office will accept for level 1 security. The required level is determined by the location of the researcher and the maximum inventory. The monetary value of the inventory is calculated using the illicit value of the drug. **(See Appendix "B", Table 1).**

1.1.2. The Office will consider alternate forms of secure environs, such as laminates, providing they are equal in force resistance to the examples given below.

1.2 Secure Environs

1.2.1. Cupboard, refrigerator, a drawer in a steel cabinet, or an equivalent may be used for this level of security provided it is located in a locked room and fastened to the room's floor or wall. The device used to store the researcher's inventory is to be secured with an approved padlock **(see Appendix "E")** or its equivalent.

1.2.2. The approved security device, in 1.2.1., must be located in an area to which the public does not have access.

1.2.3. Records of the issuing of combinations and keys, under the authorization of an officer in the institution, shall be maintained and be available to Therapeutic Products Programme (TPP) inspectors.

SECURITY LEVEL - 2
Special Projects (Researchers)

2.1 General

2.1.1. The following are examples of the minimum requirements which the Office will accept for level 2 security. The required level is determined by the location of the researcher and the maximum inventory. The monetary value of the inventory is calculated using the illicit value of the drug. **(See Appendix "B", Table 1).**

2.1.2. The Office will consider alternate forms of secure environs, such as laminates, providing they are equal in force resistance to the examples given below.

2.1.3. An alarm system is required. It must at least activate a local electric horn or bell when an unauthorized access is attempted.

2.2 Secure Environs

2.2.1. Steel cabinet, refrigerator or equivalent is acceptable provided it is located in a locked room and fastened to a wall or floor in such a manner that it is not moveable. The cabinet or refrigerator must be locked with an approved padlock **(see Appendix "E")**.

2.2.2. The approved security device, in 2.2.1., must be located in an area to which the public does not have access.

2.2.3. Records of the issuing of combinations and keys, under the authorization of an officer in the institution, shall be maintained and be available to TPP inspectors.

SECURITY LEVEL - 3
Special Projects (Researchers)

3.1 General

3.1.1. The following are examples of the minimum requirements which the Office will accept for level 3 security. The required level is determined by the location of the licenced dealer or researcher and the maximum inventory. The monetary value of the inventory is calculated using the illicit value of the drug. **(See Appendix "B", Table 1).**

3.1.2. The Office will consider alternate forms of secure environs, such as laminates, providing they are equal in force resistance to the examples given below.

3.1.3. An alarm system is required. It must at least activate a local electric horn or bell when an unauthorized access is attempted.

3.2 Secure Environs (Vault)

3.2.1. WALL/FLOOR/CEILING

a) Constructed of 10 cm (4") cement block minimum or equivalent.

b) Structural floor to structural ceiling construction (i.e. -no false floors or ceilings).

c) Unsecured openings must have one dimension less than 15 cm (6") and not to exceed 619 cm2 (96in2). Acceptable grill work for secured opening will consist of 3.5 mm (10 gauge) metal mesh screen or equivalent.

3.2.2. DOOR

a) Solid core wooden door or hollow metal.

b) Locking device must penetrate the door frame at least 1.25 cm or be of a vertical throw type lock. Locking device cannot be on a master key system.

c) Metal frame grouted in the area of the strike plate. Wood frame blocked in the area of the strike plate complete with a high security strike.

d) one and one half pair butt hinges (3 hinges (no removable pins if outswinging door)).

e) Windows in door not permitted.

3.2.3. Records of the issuing of combinations and keys, under the authorization of an officer in the institution, shall be maintained and be available to TPP inspectors.

3.3 Safe

3.3.1. A records safe may be used for this security level providing it is not rated lower than U.L.C. (Underwriters Laboratories of Canada) type "D" (350 - 1 new rating). The safe must be anchored to the floor.

3.3.2. The safe must be located in a locked cupboard or room. No window should be located within 4.5 metres (15') from the grade level or roof deck unless it is locked. There are no size restrictions on the windows. Windows are not permitted within 1 metre (3') of the door. Windows fixed or openable with a lock must have a grill or screen of 3.5 mm (10 gauge) expanded metal mesh or equivalent installed in a manner that it is removable from the inside only. An acceptable alternative to the window requirements stated above is if the windows are polycarbonate glazed and mounted in a heavy duty frame.

3.3.3. If the safe is located in a metal cage, in lieu of a locked room or cupboard then the cage must conform to the description of a cage given in **Appendix "D".**

SECURITY LEVEL - 4

4.1 General

4.1.1. The following are examples of the minimum requirements which the Office will accept for level 4 security. This level is determined by the location of the licenced dealer or researcher and the maximum inventory. The monetary value of the inventory is calculated using the illicit value of the drug. **(See Appendix "B", Table 1).**

4.1.2. The Office will consider alternate forms of secure environs, such as laminates, providing they are equal in force resistance to the examples given below.

4.1.3. Minimum Electrical Detection Requirements:

a) Sufficient detectors to indicate when there is an unauthorized attempt to open, penetrate or remove the vault or safe.

b) Smoke detector inside vault.

c) May be wired into general warehouse security detection equipment. Minimum Grade "B" line supervision is required or "d)" below. Line supervision is to be monitored by a monitoring station.

d) Automatic dialer is acceptable to signal an alarm situation to a monitoring station. The automatic dialer (Digital Communicator) is to be connected to the monitoring station on a private line. The access number to this line is to be unlisted and the line restricted to only the automatic dialer. No line supervision can be provided for this type of service, however, a line monitor can be installed (together with a bell or siren) which will, if the line is cut, ensure that the bell/siren will still operate as a local alarm.

4.1.4. All electrical conduit for the alarm system, security equipment, lighting, telephone, etc. shall be in accordance with any applicable electrical code.

4.1.5. The secure environs, if they include a vault, safe or caged area, must be located at least 1 metre (3') from any outside wall if it is located on either a ground floor or if it is accessible from a roof. The Office may consider certain conditions to be equivalent to the 1 metre (3') requirements. These conditions may be in the form of another building in close proximity to the secure environs, ditches, cement pylons, etc. The 1 metre (3') requirement, applies regardless of the distance from the ground or accessible roof, if construction is to be against a wall which is common to another company.

4.1.6. **Ventilation** - Openings in the vault for ventilation or air conditioning are not allowed if the overall security of the vault is lowered. In instances where either a circulation of air or air conditioning is necessary for the drug stability, one of the following conditions must be met:

a) Openings must have one dimension 15 cm (6") or less and the total area of the opening cannot exceed 619 cm2 (96in2).

b) The opening or duct work must be protected by the installation of N° 5 (15 mm (5/8")) steel reinforcing rods securely anchored into the wall on 15 cm (6") centers and horizontally reinforced on 40 cm (16") centers, or a grill.

c) If a grill is to be used it is to be constructed of either N° 5 (15 mm (5/8")) steel reinforcing rods on 15 cm (6") centers and horizontally reinforced on 40 cm (16") centers, or 3.5 mm (10 gauge) expanded metal mesh, welded into a 6 mm (1/4") metal frame. The frame is to be securely anchored to the wall.

4.2. Secure Environs (Vault)

4.2.1. WALLS

Cement Block

High density concrete block 15 cm (6") thick with cores filled with type "M" mortar and reinforced as required to meet structural codes, **or**

Poured Concrete

a) 10 cm (4") of poured concrete (20.7 MPa (3000 lb/in2) minimum).

b) Reinforced as required to meet structural codes.

CEILING/FLOOR

a) 10 cm (4") of poured concrete (20.7 MPa (3000 lb/in2) minimum).

b) Reinforced as required to meet structural codes.

4.2.2. DOOR

a) 1.2 mm (18 gauge) hollow metal door with a 1.5 mm (16 gauge) metal frame.

b) Grouted or blocked in the area of the strike plate.

c) Locking device must penetrate the door frame at least 1.25 cm or else be a vertical throw type.

d) Not to be on a master key system.

e) Records of the issuing of combinations and keys, under the authorization of an officer in the institution, shall be maintained and be available to TPP inspectors.

4.3 Safe

4.3.1. A records safe (fire resistant safe) may be used for this level of security providing it has a U.L.C. (Underwriters Laboratories of Canada) rating of class A, B, or C (New Ratings 350-4, 350-2, 350-1 respectively).

4.3.2. It should be noted that the class "C" safe offers the same force resistance as the class "A" and "B" safes. Class "A" and "B" safes are constructed with more insulating material which results in increased fire protection for the contents.

4.3.3. The safe can be installed in a room which is normally under a lock and key system. (See 4.3.6. below). The room must be equipped with a detector which will indicate when there is an unauthorized attempt to open the door. The room and door must meet the requirements of 3.2.2 and 3.3.2.

4.3.4. Records of the issuing of combinations and keys, under the authorization of an officer in the institution, shall be maintained and be available to TPP inspectors.

4.3.5. If the safe is located in a metal caged area, in lieu of the locked room, the cage must meet the requirements outlined in **Appendix "D".**

4.3.6. Safe must be anchored to the floor in such a manner that it cannot be removed without first opening the door.

4.4 Cage

4.4.1. Certain controlled substances may be held in a caged area. Appendix "D" identifies the drugs which can be stored in this manner as well as the requirements for both the cage's construction and its electrical detection equipment.

SECURITY LEVEL - 5

5.1 General

5.1.1. The following are examples of the minimum requirements which the Office will accept for level 5 security. This level is determined by the location of the licenced dealer and the maximum inventory. The monetary value of the inventory is calculated using the illicit value of the drug. **(See Appendix "B", Table 1).**

5.1.2. The Office will consider alternate forms of secure environs, such as laminates, providing they are equal in force resistance to the examples given below.

5.1.3 Minimum Electrical Detection Requirements:

a) Sufficient detectors to indicate when there is an unauthorized attempt to open, penetrate or remove the vault or safe.

b) Smoke detector inside vault.

c) Detection equipment which will indicate motion inside the vault.

d) Vault or safe detection equipment may be wired into general warehouse security. Minimum Grade "B" line supervision is required. Line supervision is to be monitored by a monitoring station.

e) Control boxes for the security system are to be located inside the vault and safe.

f) Proximity detector (capacitance detector), if used in conjunction with a safe, must be placed either inside or underneath the safe whenever feasible. Alternate equivalent detection equipment may be used.

5.1.4. All electrical conduit for the alarm system, security equipment, lighting, telephone, etc. shall be in accordance with any applicable electrical code. All conduit entering the walls, ceiling, or floor shall have at least one offset within the vault structure. Arrangement of bends shall be so that drainage is to the exterior. Conduit shall not exceed 3.8 cm (1 ½") diameter.

5.1.5. The secure environs if they include a vault, safe or caged area, must be located at least 1 metre (3') from any outside wall if located on a ground floor or an accessible roof. The Office may consider certain conditions to be equivalent to the 1 metre (3') requirements. These conditions may be in the form of another building in close proximity to the secure environs, ditches, cement pylons, etc. The 1 metre (3') requirement applies, regardless of the distance from the ground or accessible roof, if

construction is to be against a wall which is common to another company.

5.1.6. **Ventilation** - Openings in the vault for ventilation or air conditioning are not allowed if the overall security of the vault is lowered. In instances where either a circulation of air or air conditioning is necessary for the drug stability, one of the following conditions must be met:

a) Openings must have one dimension 15 cm (6") or less and the total area of the opening cannot exceed 619 cm2 (96in2).

b) The opening or duct work must be protected by the installation of N° 5 (15 mm (5/8")) steel reinforcing rods securely anchored into the wall on 15 cm (6") centers and horizontally reinforced on 40 cm (16") centers, or a grill.

c) If a grill is to be used it is to be constructed of either N° 5 (15 mm (5/8")) steel reinforcing rods on 15 cm (6") centers and horizontally reinforced on 40 cm (16") centers, or 3.5 mm (10 gauge) expanded metal mesh, welded into a 6 mm (1/4") metal frame. The frame is to be securely anchored to the wall.

5.2 Secure Environs (Vault)

5.2.1. WALLS

Cement Block

20 cm (8") high density concrete blocks with cores filled with type "M" mortar and reinforced as required to meet structural codes, **or**

Poured Concrete

a) 15 cm (6") thick poured concrete (20.7 MPa (3000 lbs/in2) minimum).

b) Reinforced as required to meet structural codes.

CEILING/FLOOR

a) 15 cm (6") thick poured concrete (20.7 MPa (3000 lbs/in2) minimum).

b) Reinforced as required to meet structural codes.

5.2.2. DOOR

a) 1.5 mm (16 gauge) hollow metal door with a 1.9 mm (14 gauge) metal frame.

b) Grouted or blocked in the area of the strike plate.

c) Locking device must penetrate the door frame at least 1.25 cm or be a vertical throw locking device.

d) Not to be on a master key system.

e) Records of the issuing of combinations and keys, under the authorization of an officer in the institution, shall be maintained and be available to TPP inspectors.

5.3 Safe

5.3.1. A records safe (fire resistant safe) may be used for this level of security providing it has a U.L.C. (Underwriters Laboratories of Canada) rating of class A, B, or C (New Ratings 350-4, 350-2, 350-1 respectively).

5.3.2. It should be noted that the class "C" safe offers the same force resistance as the class "A" and "B" safes. Class "A" and "B" safes are constructed with more insulating material which results in increased fire protection for the contents.

5.3.3. The safe can be installed in a room which is normally under a lock and key system. (See 5.3.6. below). The room must be equipped with a detector which will indicate when there is an unauthorized attempt to open the door. The room and door must meet the requirements of 3.2.2 and 3.3.2.

5.3.4. Records of the issuing of combinations and keys, under the authorization of an officer in the institution, shall be maintained and be available to TPP inspectors.

5.3.5. If the safe is located in a metal caged area, in lieu of the locked room, the cage must meet the requirements outlined in **Appendix "D".**

5.3.6. Safe must be anchored to the floor in such a manner that it cannot be removed without first opening the door.

5.4 Cage

5.4.1. Certain controlled substances may be held in a caged area. Appendix "D" identifies the drugs which can be stored in this manner as well as the requirements for both the cage's construction and its electrical detection equipment.

SECURITY LEVEL - 6

6.1 General

6.1.1. The following are examples of the minimum requirements which the Office will accept for level 6 security. This level is determined by the location of the licenced dealer and the maximum inventory. The monetary value of the inventory is calculated using the illicit value of the drug. **(See Appendix "B", Table 1).**

6.1.2. The Office will consider alternate forms of secure environs, such as laminates, providing they are equal in force resistance to the examples given below.

6.1.3. Minimum Electrical Detection Requirements:

a) Smoke detector inside vault.

b) Sufficient detectors to indicate when there is an unauthorized attempt to access, penetrate, remove, or open the vault or safe.

c) Detectors which will indicate when there is an unauthorized opening of the vault or safe door or any attempt to circumvent the detector is made.

d) All vault and safe alarms on one zone which is separate from other detection devices installed in the warehouse.

e) Electrical detection equipment is to be monitored by a monitoring station. Minimum Grade "B" line supervision is required.

f) Control boxes for the security system are to be located inside the vault or safe.

g) Proximity detector (capacitance detector) if used in conjunction with a safe must be placed either inside or underneath the safe whenever feasible. Alternate equivalent detection equipment may be used.

6.1.4. All electrical conduit for the alarm system, security equipment, lighting, telephone, etc. shall be in accordance with any applicable electrical code. All conduit entering the walls, ceiling, or floor shall have at least one offset within the vault structure. Arrangement of bends shall be so that drainage is to the exterior. Conduit shall not exceed 3.8 cm (1 ½") diameter.

6.1.5. The secure environs if they include a vault, safe or caged area, are to be located at least 1 metre (3') from any outside wall if located on a ground floor or an accessible roof. The Office may consider certain conditions to be equivalent to the 1 metre (3') requirements. These conditions may be in the form of another building in close proximity to the secure environs, ditches, cement pylons, etc. The 1 metre (3') requirement applies, regardless of the distance from the ground or accessible roof, if construction is to be against a wall which is common to another company.

6.1.6. **Ventilation** - Openings in the vault for ventilation or air conditioning are not allowed if the overall security of the vault is lowered. In instances where either a circulation of air or air conditioning is necessary for the drug stability, one of the following conditions must be met:

a) Openings must have one dimension 15 cm (6") or less and the total area of the opening cannot exceed 619 cm2 (96in2).

b) The opening or duct work must be protected by the installation of N° 5 (15 mm (5/8")) steel reinforcing rods securely anchored into the wall on 15 cm (6") centers and horizontally reinforced on 40 cm (16") centers, or a grill.

c) If a grill is to be used it is to be constructed of either N° 5 (15 mm (5/8")) steel reinforcing rods on 15 cm (6") centers and horizontally reinforced on 40 cm (16") centers, or 3.5 mm (10 gauge) expanded metal mesh, welded into a 6 mm (1/4") metal frame. The frame is to be securely anchored to the wall.

6.2. Secure Environs (Vault)

6.2.1. WALLS

Cement Block

30 cm (12") high density cement blocks with cores filled with type "M" mortar and reinforced to meet structural codes, or

Poured Concrete

a) 20 cm (8") thick poured concrete (20.7 MPa (3000 lbs/in2) minimum).

b) Reinforced to meet structural codes.

CEILING/FLOOR

a) 20 cm (8") thick poured concrete (20.7 MPa (3000 lbs/in2) minimum).

b) Reinforced to meet structural codes.

6.2.2. DOOR

a) Solid wooden door wrapped with 1.5 mm (16 gauge) steel and a 1.9 mm (14 gauge) metal frame.

b) Secured with an approved padlock **(See Appendix E)** and hasp. A multibolt lock system may be considered equivalent by the Office.

6.3 Safe

6.3.1. If a safe is to be used for level 6 security instead of a vault, it is to be a burglar resistant safe which is Underwriter Laboratories of Canada (ULC) rated at a level ULC-TL-15.

6.3.2. The safe can be installed in a room which is normally under a lock and key system. (See 6.3.5. below). The room must be equipped with a detector which will indicate when there is an unauthorized attempt to open the door. The room and door must meet the requirements of 3.2.2 and 3.3.2.

6.3.3. Records of the issuing of combinations and keys, under the authorization of an officer in the institution, shall be maintained and be available to TPP inspectors.

6.3.4. Safe must be anchored to the floor in such a manner that it cannot be removed without first opening the door.

6.3.5. If the safe is located in a metal cage, in lieu of a locked room, the cage must meet the requirements outlined in **Appendix "D".**

6.4 Cage

6.4.1. Certain controlled substances may be held in a caged area. Appendix "D" identifies the drugs which can be stored in this manner as well as the requirements for both the cage's construction and its electrical detection equipment.

SECURITY LEVEL - 7

7.1 General

7.1.1. The following are examples of the minimum requirements which the Office will accept for level 7 security. This level is determined by the location of the licenced dealer and the maximum inventory. The monetary value of the inventory is calculated using the illicit value of the drug. **(See Appendix "B", Table 1).**

7.1.2. The Office will consider alternate forms of secure environs, such as laminates, providing they are equal in force resistance to the examples given below.

7.1.3. Minimum Electrical Detection Requirements:

a) Smoke detector inside vault.

b) Sufficient detectors to indicate when there is an unauthorized attempt to access, penetrate, remove, or open the vault or safe.

c) Detectors which will indicate when there is an unauthorized opening of the vault or safe door or any attempt to circumvent the detector is made.

d) All vault and safe alarms on one zone which is separate from other detection devices installed in the warehouse.

e) Vault or safe alarm equipment is to be monitored by a U.L.C. (Underwriters Laboratories of Canada) approved central monitoring station. When such service is unavailable the Office will consider alternates.

f) Grade "B" Line supervision.

g) Control boxes for the security system are to be located inside the vault or safe.

h) Proximity detector (capacitance detector) if used in conjunction with a safe must be placed either inside or underneath the safe whenever feasible.

7.1.4. All electrical conduit for the alarm system, security equipment, lighting, telephone, etc. shall be in accordance with any applicable electrical code. All conduit entering the walls, ceiling, or floor shall have at least one offset within the vault structure. Arrangement of bends shall be so that drainage is to the exterior. Conduit shall not exceed 3.8 cm (1 1/2") diameter.

7.1.5. The secure environs if they include a vault, safe or caged area, are to be located at least 1 metre (3') from any outside wall if located on a ground floor or an accessible

roof. The Office may consider certain conditions to be equivalent to the 1 metre (3') requirements. These conditions may be in the form of another building in close proximity to the secure environs, ditches, cement pylons, etc. The 1 metre (3') requirement applies, regardless of the distance from the ground or accessible roof, if construction is to be against a wall which is common to another company.

7.1.6. **Ventilation** - Openings in the vault for ventilation or air conditioning are not allowed if the overall security of the vault is lowered. In instances where either a circulation of air or air conditioning is necessary for the drug stability, one of the following conditions must be met:

a) Openings must have one dimension 15 cm (6") or less and the total area of the opening cannot exceed 619 cm2 (96in2).

b) The opening or duct work must be protected by the installation of N° 5 (15 mm (5/8")) steel reinforcing rods securely anchored into the wall on 15 cm (6") centers and horizontally reinforced on 40 cm (16") centers, or a grill.

c) If a grill is to be used it is to be constructed of either N° 5 (15 mm (5/8")) steel reinforcing rods on 15 cm (6") centers and horizontally reinforced on 40 cm (16") centers, or 3.5 mm (10 gauge) expanded metal mesh, welded into a 6 mm (1/4") metal frame. The frame is to be securely anchored to the wall.

7.2 Secure Environs (Vault)

7.2.1. WALLS

Cement Block

High density concrete block wall 15 cm (6") thick reinforced every void with N° 5 (15 mm (5/8")) deformed steel reinforcing bars. Each void filled with type "M" mortar, **or**

Poured Concrete (20.7 MPa (3000 lb/in2) minimum).

10 cm (4") poured concrete reinforced every 20 cm (8") with deformed steel reinforcing bars N° 5 (15 mm (5/8")) thick in both directions or reinforced using 3.5 mm (10 gauge) expanded metal mesh which has opening 5 x 2.5 cm (2" x 1").

CEILING/FLOOR

10 cm (4") poured concrete (20.7 MPa (3000 lb/in2) minimum) reinforced with N° 5 (15 mm (5/8")) deformed steel reinforcing bars every 20 cm (8") in both directions or reinforced with 3.5 mm (10 gauge) expanded metal mesh which has opening 5 x

2.5 cm (2" x 1").

7.2.2. DOOR

a) Any fire resistant bank type vault door will be acceptable. (Insulated Record Storage Vault Door).

b) Any inside escape handle attached to the door must be removed or rendered inoperable. A telephone, intercom or other type of warning device may be installed, to replace the escape handle for those instances when someone is accidentally locked inside the vault. These warning devices are not an Office requirement.

c) Combination lock is to be changeable, manipulation proof, possessing at least 3 tumblers and have a spy proof dial.

d) The lock combination must be stored in a secure location and changed yearly, or whenever a person knowing the combination no longer requires it.

7.3 Safe

7.3.1. If a safe is to be used for level 7 security instead of a vault, it is to be a burglar resistant safe which is Underwriters Laboratories of Canada (ULC) rated at a level ULC-TL-30.

7.3.2. The safe is to be located in a caged area which meets the requirements described in **Appendix "D"**.

7.3.3. The caged area described in 7.3.2 should be located in a locked room.

7.3.4. Safe must be anchored to the floor in such a manner that it cannot be removed without first opening the safe door.

7.3.5. If the safe is equipped with a combination lock, the lock combination must be stored in a secure location and changed yearly, or whenever a person knowing the combination no longer requires it.

7.4 Cage

7.4.1 Certain controlled substances may be held in a caged area. Appendix "D" identifies the drugs which can be stored in this manner as well as the requirements for both the cage's construction and its electrical detection equipment.

SECURITY LEVEL - 8

8.1 General

8.1.1. The following are examples of the minimum requirements which the Office will accept for level 8 security. This level is determined by the location of the licenced dealer and the maximum inventory. The monetary value of the inventory is calculated using the illicit value of the drug. **(See Appendix "B", Table 1).**

8.1.2. The Office will consider alternate forms of secure environs, such as laminates, providing they are equal in force resistance to the examples given below.

8.1.3. Minimum Electrical Detection Requirements:

a) Smoke detector inside vault.

b) Sufficient detectors to indicate when there is an unauthorized attempt to access, penetrate, remove, or open the vault or safe.

c) Detectors which will indicate when there is an unauthorized opening of the vault or safe door or any attempt to circumvent the detector is made.

d) All vault and safe alarms on one zone which is separate from other detection devices installed in the warehouse.

e) Vault or safe alarm equipment is to be monitored by a U.L.C. (Underwriters Laboratories of Canada) approved central monitoring station. When such service is unavailable the Office will consider alternates.

f) Grade double "B" Line supervision.

g) Control boxes for the security system are to be located inside the vault or safe.

h) Proximity detector (capacitance detector) if used in conjunction with a safe must be placed either inside or underneath the safe whenever feasible. Alternate equivalent detection equipment may be used.

i) When the building lacks complete perimeter security coverage, all accessible exterior vault walls, floor and ceiling must be provided with motion detectors or approved alternate detectors to provide effective motion detection.

j) Electrical detection equipment is required for the caged area.

8.1.4 All electrical conduit for the alarm system, security equipment, lighting, telephone, etc. shall be in accordance with any applicable electrical code. All conduit entering the walls, ceiling, or floor shall have at least one offset within the vault structure. Arrangement of bends shall be so that drainage is to the exterior. Conduit shall not exceed 3.8 cm (1 1/2") diameter.

8.1.5. The secure environs if they include a vault, safe or caged area, are to be located at least 1 metre (3') from any outside wall if located on a ground floor or an accessible roof. The Office may consider certain conditions to be equivalent to the 1 metre (3') requirements. These conditions may be in the form of another building in close proximity to the secure environs, ditches, cement pylons, etc. The 1 metre (3') requirement applies, regardless of the distance from the ground or accessible roof, if construction is to be against a wall which is common to another company.

8.1.6. **Ventilation** - Openings in the vault for ventilation or air conditioning are not allowed if the overall security of the vault is lowered. In instances where either a circulation of air or air conditioning is necessary for the drug stability, one of the following conditions must be met:

a) Openings must have one dimension 15 cm (6") or less and the total area of the opening cannot exceed 619 cm2 (96in2).

b) The opening or duct work must be protected by the installation of N° 5 (15 mm (5/8")) steel reinforcing rods securely anchored into the wall on 15 cm (6") centers and horizontally reinforced on 40 cm (16") centers, or a grill.

c) If a grill is to be used it is to be constructed of either N° 5 (15 mm (5/8")) steel reinforcing rods on 15 cm (6") centers and horizontally reinforced on 40 cm (16") centers, or 3.5 mm (10 gauge) expanded metal mesh, welded into a 6 mm (1/4") metal frame. The frame is to be securely anchored to the wall.

8.1.7 A clear area of 0.6 metres (2') around vault to be used for inspection and detection purposes shall be maintained around all safes and vaults in this category.

8.2. Secure Environs (Vault)

8.2.1 WALLS

Cement Block

High density concrete block 20 cm (8") thick reinforced with N° 5 (15 mm (5/8")) deformed steel reinforcing bars in every void. Each void is also to be filled with type "M" concrete, or

Poured Concrete (20.7 MPa (3000 lb/in2) minimum).

Poured concrete 15 cm (6") thick and reinforced using N° 5 (15 mm (5/8")) deformed steel reinforcing bars every 8" vertically and every 60 cm (24") horizontally or reinforced using 3.5 mm (10 gauge) expanded metal mesh which has opening 5 cm x 2.5 cm (2" x 1").

CEILING/FLOOR

Poured concrete (20.7 MPa (3000 lb/in2) minimum) 15 cm (6") thick reinforced using N° 5 (15 mm (5/8")) deformed steel reinforcing bars every 20 cm (8") in one direction and every 60 cm (24") in the opposite direction or reinforced by using 3.5 mm (10 gauge) expanded metal mesh which has an opening 5 cm x 2.5 cm (2" x 1").

FLOOR ON GRADE

Poured concrete (20.7 MPa (3000 lb/in2) minimum) 10 cm (4") thick (supporting foundation for vault walls may be required).

8.2.2 DOOR

a) A fire resistant bank type door is acceptable providing the face plate is a minimum of 0.62 cm (1/4") steel and the door possesses a relocking device. (Insulated Record Storage vault door).

b) Any inside escape handle attached to the door must be removed or rendered inoperable. A telephone, intercom or other type of warning device may be installed, to replace the escape handle for those instances when someone is accidentally locked inside the vault. These warning devices are not an Office requirement.

c) Combination lock is to be changeable, manipulation proof possessing at least 3 tumblers and have a spy proof dial.

d) The lock combination must be stored in a secure location and changed yearly, or when a person knowing the combination no longer requires it.

8.3 Safe

8.3.1. If a safe is to be used for level 8 security instead of a vault, it is to be a burglar

resistant safe which is Underwriters Laboratories of Canada (ULC) rated at a level TRTL-30.

8.3.2. The safe is located in a caged area which meets the requirements described in **Appendix "D"**.

8.3.3. The caged area described in 8.3.2 should be located in a locked room.

8.3.4. The safe is to be anchored to the floor in such a manner that it cannot be removed without first opening the door.

8.3.5. If the safe is equipped with a combination lock, the lock combination must be stored in a secure location and changed yearly, or whenever a person knowing the combination no longer requires it.

8.4 Cage

8.4.1 Certain controlled substances may be held in a caged area. Appendix "D" identifies the drugs which can be stored in this manner as well as the requirements for both the cage's construction and its electrical detection equipment.

SECURITY LEVEL - 9

9.1 General

9.1.1. The following are examples of the minimum requirements which the Office will accept for level 9 security. This level is determined by the location of the licenced dealer and the maximum inventory. The monetary value of the inventory is calculated using the illicit value of the drug. **(See Appendix "B", Table 1).**

9.1.2. The Office will consider alternate forms of secure environs, such as laminates, providing they are equal in force resistance to the examples given below.

9.1.3. Minimum Electrical Detection Requirements:

a) Smoke detector inside vault.

b) Sufficient detectors to indicate when there is an unauthorized attempt to access, penetrate, remove, or open the vault or safe.

c) Detectors which will indicate when there is an unauthorized opening of the vault or safe door or any attempt to circumvent the detector is made.

d) All vault and safe alarms on one zone which is separate from other detection devices installed in the warehouse.

e) Vault or safe alarm equipment is to be monitored by a U.L.C. (Underwriters Laboratories of Canada) approved central monitoring station. When such service is unavailable the Office will consider alternates.

f) Grade "A" Line supervision.

g) All alarm control boxes are to be mounted inside the vault or safe and possess either a keyed time delay circuit or digital code call in.

h) Proximity detector (capacitance detector) if used in conjunction with a safe must be placed either inside or underneath the safe whenever feasible.

i) Complete exterior electrical detection of the walls and ceiling with motion detectors or approved alternate detectors to provide effective movement detection of the 0.6 metre free area as defined in 9.1.7.

j) Electrical detection equipment is required for caged area. (See 12.1.3)

k) Additional detection equipment as required. When the building lacks

complete perimeter security coverage, that portion of the room or area which contains the vault and/or cage must have sufficient electrical detection equipment to indicate when there is an unauthorized attempt to access this area.

9.1.4 All electrical conduit for the alarm system, security equipment, lighting, telephone, etc. shall be in accordance with any applicable electrical code. All conduit entering the walls, ceiling, or floor shall have at least one offset within the vault structure. Arrangement of bends shall be so that drainage is to the exterior. Conduit shall not exceed 3.8 cm (1 1/2") diameter.

9.1.5. The secure environs if they include a vault, safe or caged area, are to be located at least 1 metre (3') from any outside wall if located on a ground floor or an accessible roof. The Office may consider certain conditions to be equivalent to the 1 metre (3') requirements. These conditions may be in the form of another building in close proximity to the secure environs, ditches, cement pylons, etc. The 1 metre (3') requirement applies, regardless of the distance from the ground or accessible roof, if construction is to be against a wall which is common to another company.

9.1.6. **Ventilation** - Openings in the vault for ventilation or air conditioning are not allowed if the overall security of the vault is lowered. In instances where either a circulation of air or air conditioning is necessary for the drug stability, one of the following conditions must be met:

a) Openings must have one dimension 15 cm (6") or less and the total area of the opening cannot exceed 619 cm2 (96in2).

b) The opening or duct work must be protected by the installation of N° 5 (15 mm (5/8")) steel reinforcing rods securely anchored into the wall on 15 cm (6") centers and horizontally reinforced on 40 cm (16") centers, or a grill.

c) If a grill is to be used it is to be constructed of either N° 5 (15 mm (5/8")) steel reinforcing rods on 15 cm (6") centers and horizontally reinforced on 40 cm (16") centers, or 3.5 mm (10 gauge) expanded metal mesh, welded into a 6 mm (1/4") metal frame. The frame is to be securely anchored to the wall.

9.1.7 A clear area of 0.6 metres (2') around vault to be used for inspection and detection purposes shall be maintained around all safes and vaults in this category.

9.2. Secure Environs (Vault)

9.2.1. WALLS

Cement Block

High density concrete block 30 cm (12") thick reinforced each void with N° 5 (15 mm (5/8")) deformed steel bars vertically and horizontally on each layer of blocks with steel truss block reinforcing. Each void to be filled with type "M" mortar, **or**

Poured Concrete (20.7 MPa (3000 lb/in2) minimum)

Poured concrete 20 cm (8") thick reinforced with N° 5 (15 mm (5/8")) deformed steel reinforcing bars placed every 15 cm (6") in both directions.

CEILING/FLOOR

Poured concrete (20.7 MPa (3000 lb/in2) minimum) 20 cm (8") thick reinforced with N° 5 (15 mm (5/8")) deformed steel reinforcing bars placed every 15 cm (6") in both directions.

FLOOR ON GRADE

Poured concrete (20.7 MPa (3000 lb/in2) minimum) 10 cm (4") thick (supporting foundation for vault walls may be required).

NOTE: If a cage is to be used in conjunction with the vault it is preferable if it extends completely around the vault with a 0.6 metre (2') standoff. **(See 9.1.7. above).** This clear area is not to be used for the storage of controlled substances.

9.2.2 DOOR

a) Bank type vault door which has a minimum steel face plate of 1.25 cm (1/2").

b) Any inside escape handle attached to the door must be removed or rendered inoperable. A telephone, intercom or other type of warning device may be installed to replace the escape handle for those instances when someone is accidentally locked inside the vault. These warning devices are not an Office requirement.

c) Combination lock is to be changeable, manipulation proof possessing at least 3 tumblers and have a spy proof dial.

d) The lock combination must be stored in a secure location and changed yearly, or when a person knowing the combination no longer requires it.

e) Door to have relocking device.

9.3 Safe

9.3.1. If a safe is to be used for level 9 security instead of a vault, it is to be a burglar resistant safe which is Underwriters Laboratories of Canada (ULC) rated at a level TRTL-30 x 6.

9.3.2. The safe is to be located in a caged area which meets the requirements described in **Appendix "D"**.

9.3.3. The caged area described in 9.3.2 should be located in a locked room.

9.3.4. The safe is to be anchored to the floor in such a manner that it cannot be removed without first opening the door.

9.3.5. If the safe is equipped with a combination lock, the lock combination must bestored in a secure location and changed yearly, or whenever a person knowing the combination no longer requires it.

9.4 Cage

9.4.1 Certain controlled substances may be held in a caged area. Appendix "D" identifies the drugs which can be stored in this manner as well as the requirements for both the cage's construction and its electrical detection equipment.

SECURITY LEVEL - 10

10.1 General

10.1.1. The following are examples of the minimum requirements which the Office will accept for level 10 security. This level is determined by the location of the licenced dealer and the maximum inventory. The monetary value of the inventory is calculated using the illicit value of the drug. **(See Appendix "B", Table 1).**

10.1.2. The Office will consider alternate forms of secure environs, such as laminates, providing they are equal in force resistance to the examples given below.

10.1.3. Minimum Electrical Detection Requirements:

a) Smoke detector inside vault.

b) Sufficient detectors to indicate when there is an unauthorized attempt to access, penetrate, remove, or open the vault or safe.

c) Detectors which will indicate when there is an unauthorized opening of the vault or safe door or any attempt to circumvent the detector is made.

d) All vault and safe alarms on one zone which is separate from other detection devices installed in the warehouse.

e) Vault or safe alarm equipment is to be monitored by a U.L.C. (Underwriters Laboratories of Canada) approved central monitoring station. When such service is unavailable the Office will consider alternates.

f) Grade double "A" Line supervision.

g) All alarm control boxes are to be mounted inside the vault or safe and possess either a keyed time delay circuit or digital code call in.

h) Proximity detector (capacitance detector) if used in conjunction with a safe must be placed either inside or underneath the safe whenever feasible.

i) Complete exterior electrical detection of the walls and ceiling with motion detectors or approved alternate detectors to provide effective movement detection of the 0.6 metre free area as defined in 10.1.7.

j) Electrical detection equipment is required for caged area. (See 12.1.3).

k) Additional detection equipment as required. When the building lacks complete perimeter security coverage, the room which contains the vault must

have sufficient electrical detection equipment to indicate an unauthorized attempt to access this area.

10.1.4 All electrical conduit for the alarm system, security equipment, lighting, telephone, etc. shall be in accordance with any applicable electrical code. All conduit entering the walls, ceiling, or floor shall have at least one offset within the vault structure. Arrangement of bends shall be so that drainage is to the exterior. Conduit shall not exceed 3.8 cm (1 1/2") diameter.

10.1.5. The secure environs if they include a vault, safe or caged area, are to be located at least 1 metre (3') from any outside wall if located on a ground floor or an accessible roof. The Office may consider certain conditions to be equivalent to the 1 metre (3') requirements. These conditions may be in the form of another building in close proximity to the secure environs, ditches, cement pylons, etc. The 1 metre (3') requirement applies, regardless of the distance from the ground or accessible roof, if construction is to be against a wall which is common to another company.

10.1.6. **Ventilation** - Openings in the vault for ventilation or air conditioning are not allowed if the overall security of the vault is lowered. In instances where either a circulation of air or air conditioning is necessary for the drug stability, one of the following conditions must be met:

a) Openings must have one dimension 15 cm (6") or less and the total area of the opening cannot exceed 619 cm2 (96in2).

b) The opening or duct work must be protected by the installation of N° 5 (15 mm (5/8")) steel reinforcing rods securely anchored into the wall on 15 cm (6") centers and horizontally reinforced on 40 cm (16") centers, or a grill.

c) If a grill is to be used it is to be constructed of either N° 5 (15 mm (5/8")) steel reinforcing rods on 15 cm (6") centers and horizontally reinforced on 40 cm (16") centers, or 3.5 mm (10 gauge) expanded metal mesh, welded into a 6 mm (1/4") metal frame. The frame is to be securely anchored to the wall.

10.1.7 A clear area of 0.6 metres (2') around vault to be used for the inspection and detection purposes shall be maintained around all safes and vaults in this category.

10.2. Secure Environs (Vault)

10.2.1. WALLS/CEILING/FLOOR (Floor on grade)

a) Poured concrete 45 cm (18") in thickness which should develop an ultimate compression strength of at least 20.7 MPa (3000 lb/in2) minimum.

b) Wall reinforcement requires 4 grids of N° 5 (15 mm (5/8")) deformed steel. Reinforcing rods are located on 10 cm (4") centres in horizontal and vertical rows to form one of the required grids. If expanded steel bank vault mesh is used, 3 grids of the mesh are required. This steel mesh is to weigh 29 kg/in2 (6 lb/ft2) per grid and to have a diamond pattern of 7.5 cm x 20 cm (3" x 8").

c) Grids are to be located not less than 10 cm (4") apart and shall be staggered in each direction.

d) Due to the weight of the walls/ceiling a supporting foundation may be required.

NOTE The above is an indication of the minimum security required for this level. A laminate type of vault using steel and poured concrete/cement blocks may be considered by the Office to be equivalent to the above vault.

NOTE A cage is to be used in conjunction with this vault and will extend completely around the vault with a 0.6 mm (2') standoff. **(see 10.1.3. (i) and 10.1.7. above).** This clear area is not to be used for the storage of controlled substances.

10.2.2 DOOR

a) Minimum of 2.5 cm (1") steel on the face of this force resistant type door.

b) Any inside escape handle attached to the door must be removed or rendered inoperable. A telephone, intercom or other type of warning device may be installed, to replace the escape handle for those instances when someone is accidentally locked inside the vault. These warning devices are not an Office requirement.

c) Combination lock is to be changeable and manipulation proof with at least 3 tumblers and equipped with a spy proof dial.

d) The lock combination is to be stored in a secure location and changed yearly, or when a person knowing the combination no longer requires it.

e) Door to have relocking device.

10.3 Safe

10.3.1. If a safe is to be used for level 10 security it is to be a burglar resistant type which has been U.L.C. (Underwriters Laboratories of Canada) rated at a level TXTL-60X6.

10.3.2. This class of safe may not be easily acquired but can be purchased on a special order. The Office may consider a combination of two or more safes to be equivalent to level 10 security requirement depending on U.L.C. ratings of the safes being used.

10.3.3. The safe is to be located in a caged area which meets the requirements described in **Appendix "D"**.

10.3.4. The caged area described in 10.3.3 should be located in a locked room.

10.3.5. If the safe is equipped with a combination lock, the lock combination must be stored in a secure location and changed yearly, or whenever a person knowing the combination no longer requires it.

10.3.6. The safe is to be anchored to the floor in such a manner that it cannot be removed without first opening the door.

10.4 Cage

10.4.1. Certain controlled substances may be held in a caged area. Appendix "D" identifies the drugs which can be stored in this manner as well as the requirements for both the cage's construction and its electrical detection equipment.

SECURITY LEVEL - 11

11.1 General

11.1.1. Licenced Dealers who require level 11 security are to submit their proposals to this Office for evaluation. Due to the extremely high illicit value of the inventory to be maintained at this level, the Office judges each proposal on its own merits. However, the security must exceed the level 10 requirements.

11.1.2. It may aid the review process if a diagram of the building is supplied indicating the location of doors, windows, vault, and intrusion detectors as well as the location of the proposed vault. The security proposal is to cover the following topics:

Building

a) Briefly describe the general building construction of walls, roof and floor indicating their thickness and types of material used.

b) Indicate:

i) The number of floors in the building as well as those utilized by your company.

ii) The names of other companies located within this building.

iii) The type of business conducted by the other companies.

c) Is external building lighting used?

d) Is there an electrical intruder detection system used throughout the building? Please describe and indicate how it is monitored.

e) Is a guard service utilized? If so, do the guards patrol both outside and inside the building?

f) Is there a parking lot in close proximity to the building? If so, are there bumpers, or pylons used in the parking lot and/or around the building at sufficient intervals to prevent vehicles from hitting the walls?

g) Is there a perimeter fence around your building?

11.1.3. Minimum Electrical Dectection Requirements

a) Describe the electrical detection equipment to be used outside and around the vault. Indicate the type and manufacturer.

b) Describe the electrial detection equipment to be used inside the vault.

c) Is the vault detection equipment on a separate zone from other surveillance equipment used in the building?

d) Grade double "A" line supervision is required and monitored by a central monitoring station.

e) Vault control box is to be installed inside the vault.

11.1.4. All electrical conduit for the alarm system, security equipment, lighting, telephone, etc. shall be in accordance with any applicable electrical code. All conduit entering the walls, ceiling, or floor shall have at least one offset within the vault structure. Arrangements of bends shall be so that drainage is to the exterior. Conduit shall not exceed 3.8 cm (1 1/2") diameter.

11.1.5. The secure environs are to be located at least 1 metre (3') from any outside wall if located on a ground floor or accessible from a roof. The 1 meter (3') requirement applies, regardless of the distance from the ground or accessible roof, if construction is to be against a wall which is common to another company.

11.1.6. Ventilation - Describe any opening in the vault to be used for ventilation or air conditioning, and explain how the opening will be protected.

11.1.7. A clear fenced area of at least 0.6 meters (2') to be used for inspection and detection purposes shall be maintained completely around all vaults in this category. **(See Appendix "D" for the requirements of fence (cage) construction)**. This clear area is not to be used for the storage of controlled substances.

11.2 Secure Environs (Vault)

11.2.1. WALLS/CEILING/FLOOR (Floor on Grade)

a) Indicate the location of the vault within the building.

b) Describe the material used in construction of the vault,

i) Type of vault - poured concrete or cement block or laminate construction.

ii) Wall thickness.

iii) Grade of cement used - 13.8 MPa (2000 p.s.i), 20.7 MPa (3000 p.s.i) etc.

iv) Reinforcing material used in walls, floor and ceiling. Indicate the gauge of the reinforcing rods and at what intervals they are placed.

c) If a laminate type vault is to be used, describe the construction. A laminate type vault utilizes a variety of building materials sandwiched together (i.e. plywood, steel mesh, polycarbonate, etc.).

11.2.2. DOOR

a) Please describe the door to be used and also indicate the manufacturer and the model.

b) Indicate the thickness of the steel face plate of the door.

c) Describe the type of combination lock to be used on the vault door.

d) Door to have relocking device.

11.3 Cage

11.3.1 Certain controlled substances may be held in a caged area. Appendix "D" identifies the drugs which can be stored in this manner as well as the requirements for both the cage's construction and its electrical detection equipment.

APPENDIX "D"

LIST OF CONTROLLED SUBSTANCES THAT CAN BE STORED IN A CAGE

All controlled substances must be stored in a vault, safe etc. **(see Appendix B).** However, the Office will consider exempting from this requirement those categories of drugs and formulations which have demonstrated through a long history, that they have a low potential for diversion. These exemptions will be withdrawn should the potential for diversion increase. Currently, the following drugs and formulations as finished products in their final packaging may be stored in a "caged" area:

1. "Oral Prescription Narcotics" **(see Narcotic Regulation 2)** except:

    a) Formulations containing Pentazocine, or

    b) Formulations containing a controlled drug

2. "Exempted Codeine Preparations" **(see Narcotic Regulation 36).**

3. Formulations of narcotics which contain:

    Propoxyphene or dextropropoxyphene - when the amount of dextropropoxyphene per tablet, capsule, ampoule or vial does not exceed 100 mg.

4. "Controlled drug preparations" **(see Food and Drug Regulation G.01.001)** except those containing:

    (a) a narcotic, or

    (b) Methaqualone

5. Formulations of controlled drugs, not having a second controlled drug, which contain only:

    (a) Phenobarbital - when the amount of phenobarbital per tablet, capsule, ampoule or vial does not exceed 100 mg.

    (b) Thiopental - when the amount of thiopental in the container being stored is not more than 5 g.

    (c) Thiamylal - when the amount of thiamylal in the container being stored is not more than 5 g, or

    (d) Methohexital - when the amount of methohexital in the container being stored is not more than 5 g.

6. Androgenic anabolic steroids

7. Targeted substances and Benzodiazepines other than Flunitrazepam and excluding Clozapine and Olanzapine

CAGES

12.1 General

12.1.1. The caged area is to be located at least 1 metre (3') from an outside wall if located on a ground floor or accessible from a roof. The Office considers a common wall shared with another firm to be an outside wall, therefore, a 1 metre (3') free area is required. The Office may consider equivalents to the 1 metre (3') free area **(see examples 4.1.5)**.

12.1.2. The caged area should preferably be located in a locked room.

12.1.3. Sufficient electrical detection to detect unauthorized movement within the caged area.

12.1.4. Cage door or gate to be secured with an approved padlock **(see Appendix "E")** or its equivalent.

12.2 Cage Construction

12.2.1 WALLS/CEILING

a) The walls and ceiling of a caged area will be constructed of 3.5 mm (10 gauge) rolled and flattened metal mesh which has 2.5 cm x 5 cm (1" x 2") diamond shaped openings securely fastened together. If the existing floor and ceiling are to be used then the walls are to extend from structural floor to structural ceiling. The gate or door will provide force resistance equivalent to that of the walls and ceiling and be equipped with electrical door contacts.

APPENDIX "E"

PADLOCKS

The following is a list of some of the padlocks available which meet or exceed the Office's requirements.

MANUFACTURER	MODEL	SHACKLE DIAMETER (mm)	SHACKLE CLEARANCE (mm)
ABLOY	3071	11	25
AMERICAN	570 (with dead locking)	10	28
BEST	27B462 (with security sheath)	12	32
MASTER	15	11	25
MEDECO	50-600	10	25
PAPAIZ	CR60	10	35
VIRO	304/60 MM	10	35