

July 14, 2021

Rinaldo Jeanty
Director-General and Chief Inspector of Explosives
Lands and Minerals Sector
Natural Resources Canada

Sent via E-mail: ERDmms@nrcan.gc.ca

RE: RCC Comments on Proposed Amendments to Canada's *Explosive Regulations* – Industry Guidance Required in Advance of Finalization

Dear Mr. Jeanty,

Thank you for the opportunity to comment on the proposed [Regulations Amending the *Explosives Regulations \(Restricted Components\)*](#). While the Retail Council of Canada (RCC) and its members are supportive of the proposed additions to the list of restricted components, guidance and training materials must be developed in collaboration with industry, and specifically with retailers who would be primarily responsible for reporting obligations, in advance of finalization of the proposal in the *Canada Gazette*, Part II.

Our members have expressed serious concerns about what would qualify as a “suspicious” activity, sale, or transaction, which raises significant issues with regard to consumer profiling, privacy, and the threat of abusive or violent behavior towards retail staff. Clear written guidance from government, developed in consultation with RCC and its members so as to reflect operational realities, will help to minimize negative impacts on retailers and consumers and help to ensure consistent application. Guidance is also needed on what information would reasonably and safely be accessible to retail staff to report.

Government must also confirm its intent to provide clarity on specific items upon request (e.g., if a specific product is regulated or not).

We look forward to following up with you on this important issue. Please do not hesitate to contact me with any questions you may have.

Sincerely,



Jason McLinton
Vice President, Grocery Division & Regulatory Affairs

About Retail Council of Canada

Retail is Canada's largest private sector employer. Retail Council of Canada (RCC) members represent more than two thirds of retail sales in the country. RCC is a not-for-profit, industry-funded association that represents small, medium and large retail businesses in every community across the country. As the Voice of Retail™ in Canada, we proudly represent more than 45,000 storefronts in all retail formats, including department, grocery, specialty, discount, independent retailers and online merchants.

www.RetailCouncil.org