



Transport Canada's CID Webinar Q&A

The answers below are based on our interpretation of materials available from Transport Canada and are not legal advice. For definitive information regarding your own situation, please [contact Transport Canada](#).

Q: If we do not ship our sources normally (haven't been sent out since purchased), but would need to in the event of future decommissioning or repair; do we need to register now or could we register in the future when the need to repair or decommission arises?

A: If you do not regularly ship your sources, and you have not done any dangerous goods activities in the past year, you do not need to register now.

The regulations indicate that a person registers and provides information including:

- for each site, the classes and divisions of dangerous goods that were imported, offered for transport, handled or transported **within the previous fiscal year**, if any; and
- for each site, the importing, offering for transport, handling or transporting activities **that were undertaken in the previous fiscal year**, if any.

Based on this, you would register after a future decommissioning or repair that required a shipment.

Q: Is the Canadian national registration a requirement from the IAEA recommendations?

A: The Transport Canada Client Identification Database registration is not based on IAEA recommendations. Transport Canada has implemented this registration so that they obtain sufficient information on the transportation of dangerous goods in Canada (the who, what, and how), to better inform their regulatory process.

Q: Has there been clarification on the definition of 'permanent site' found in part 17.1?

A: Paragraph 17.1 has the following wording:

“In this Part, **site** means a permanent location where dangerous goods are imported, offered for transport, handled or transported and are in the direct possession of a person conducting these activities, but does not include a location where dangerous goods are used only in the scope of a person's work or as raw materials in products that they manufacture.”

There is no further clarification that we can find in Transport Canada's online information. Some clarifications and examples were used in the presentation and in other questions, which may be helpful.

Q: Consider someone who is not registered and transporting a dangerous good which is coming from outside Canada without importing, but just going through Canada. That package gets damaged, for whatsoever, reason, then who will be responsible for repairing and clearing it for re-export?

A: This presentation was intended to provide information on the new requirement to register with Transport Canada's Client Identification Database. The amendment to the regulations did not change any other part of the Transportation of Dangerous Goods regulations. So, nothing has changed with respect to the process or responsibilities around response to damaged packages.

Q: Will a hospital-based site that employs a Mo99/Tc99m generator and ships back the used/low yield generator back required to register in CID?

A: This will depend on the method of transport. If the generator is shipped as an Excepted package, following all requirements of the CNSC's *Packaging and Transport of Nuclear Substances Regulations, 2015*, and that is the ONLY type of dangerous goods that are shipped by the hospital, then registration is not required. However, if it is shipped as a Type A or Type B package, then registration is required.

Q: After filling out the forms, how long until the registration is finalized?

A: The registration is done online. If you are entering the information and not using a bulk upload, the registration is final once you have completed all registration steps, including the final verification. This can be done all in one sitting, if desired.

If you are doing a bulk upload of sites, once you upload the spreadsheet, you will have to wait for an email from the database that the upload is complete, before you can proceed to the next steps and then get to the final verification. This typically doesn't take long, and the entry can be done in one sitting, if desired.

The total time taken for registration will depend on whether or not you have all the required information ahead of time, or if you need to stop to gather information. For a company with 6 sites, using a manual entry of 1 site and a bulk upload for 5 sites (with one upload error that had to be figured out and fixed), once the information was all gathered, the process took about 90 minutes.

Q: For 811 type license holders (i.e., portable nuclear gauges) is the expectation to register just their storage location as the "site"? Definitely not feasible to list or predict in advance all construction sites the gauge goes to, or will go to, for testing ground or asphalt compaction.

A: The requirement is to register the site that you own/operate, from which the dangerous goods activities are performed. Our interpretation is that for portable gauges, the permanent storage location is the site that is registered, not the various short-term use sites such as construction sites/road building sites.

Q: Another question. How do we register as Radiation Safety Officer in Canada? Is there any course we need to get it from a local authority, or do you provide such courses?

A: This presentation was intended to provide information on the new requirement to register with Transport Canada's Client Identification Database. Being a Radiation Safety Officer (RSO) in Canada is not related to these regulation amendments.

To be an RSO, you need to provide the CNSC with your education and experience and the licensee will have to complete and send in an "Appoint a Radiation Safety Officer" form signed by both the RSO and the licensee's Applicant Authority. The RSIC offers a Radiation Safety Officer course, if such training is needed.

Please see Appendix C of REGDOC 1.6.1 v2 for more detailed information about the training and qualifications required to be a Nuclear Substance and Radiation Device licence RSO: <https://api.cnsccsn.gc.ca/dms/digital-medias/REGDOC-1-6-1-Licence-Application-Guide-Nuclear-substances-and-Radiation-Devices-version2-eng.pdf/object>.

Q: Typically, this information is already obtained through the CNSC. Is there an integration process with these two Federal entities to limit any action by employers?

A: The Transportation of Dangerous Goods Act and Regulations, and the amendment to the Regulations regarding the CID apply to all types of dangerous goods. On the other hand, the CNSC only regulates nuclear/radioactive substances. So the CID applies to radioactive materials (TDG Class 7) AND all other types of dangerous goods (Classes 1-6, 8, and 9).

There is no integration between Transport Canada and the CNSC with respect to Transport Canada's Client Identification Database. Even if you have a CNSC licence, and the CNSC is aware of the radioactive material that you transport, you still have to register with Transport Canada's CID.

Q: Did I understand correctly, Federal, provincial or municipal sites are not required to register if an officer is performing work, e.g., regulatory work. Would sites where research related work is being performed be required to register?

A: The exact wording is that the registration requirement does not apply to "a person who offers for transport, handles or transports dangerous goods at a site that are in quantities necessary for a federal, provincial or municipal officer to carry out their duties with respect to the enforcement of federal, provincial or municipal law"

So, for example, if a CNSC officer was confiscating radioactive material due to unsafe handling/control, the CNSC would not have to register if they transported it as part of that confiscation.

Research related work is not likely to fall under the "duties with respect to enforcement of laws" and as such, likely are required to register, if performing dangerous goods activities (import, offering for transport, handling, or transporting).

Q: Can you add/remove classes of hazardous goods after the initial registration?

A: Yes, after the initial registration is done, you can log into the CID and adjust the contact personnel, the site, and the site information such as modes of transport, classes of goods, and types of dangerous goods activities. Sites can be added, inactivated, or modified.

Q: Has Transport Canada made any security guarantees for the database?

A: We cannot find any Transport Canada online posting regarding a security guarantee for the database.

Q: I would like to know if, apart from registration, do we need to obtain a license and during this process do licensee need to submit Radiation safety program, radiation safety assessment / shielding calculation as we don in UAE?

A: This presentation was intended to provide information on the new requirement to register with Transport Canada's Client Identification Database. A licence is required for radioactive material if you wish to possess, use, handle, transport, ... it, unless an exemption applies. Please see <https://www.cnsccsn.gc.ca/eng/nuclear-substances/licensing-nuclear-substances-and-radiation-devices/licensing-process/> for the licencing process for Nuclear Substance and Radiation Device licencing.

- Q: Is the onus going to be on a shipper to ensure that the receiving site has registered (assuming they are separate entities)?
- A: The regulations only changed to require registration. There is no requirement to ensure that a receiving site is registered. In fact, if a site **ONLY** receives material, they do not have to register. So **with respect to the CID**, a shipper of radioactive material only needs to ensure that **THEY** are registered, not the receiver (they may still need to have a licence to receive radioactive material, per the NSCA and its regulations).
- Q: If an organization plans to ship a UN number not listed in the initial registration, is the organization required to update the registration prior to shipping? Or can it be updated during the one-year review?
- A: Note that the registration is based on Transport Canada's Transportation of Dangerous Goods classes (Classes 1-9), not specifically on the applicable UN Number. The regulations indicate that a person registers and provides information including:
- for each site, the classes and divisions of dangerous goods that were imported, offered for transport, handled or transported **within the previous fiscal year**, if any; and
 - for each site, the importing, offering for transport, handling or transporting activities **that were undertaken in the previous fiscal year**, if any.
- Based on this, if you add a new type of class shipment, you would update for the new material in the 1-year review performed after the new type of class shipment.
- Q: If a business or owner of fixed gauges occasionally disposes of these gauges will registration be required?
- A: If the business/owner of the gauges is the one who offers the gauges for transport, prepares and packages them for transport (handles) and/or transports them, then registration is required. If you are not shipping now, then registration will not be required until they are actually shipped.
- Q: What about transfers? If I ship sealed sources to another company and transfer the source to their license, do I need to register?
- A: Yes, if you are the one who is offering the source for transport, preparing/packaging it for transport (handling) and/or actually transporting the source, then you need to register. If you only do it once, and do not do it regularly, you do not need to register in advance. You can register afterwards, as the regulations have this wording:
- The regulations indicate that a person registers and provides information including:
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 - for each site, the importing, offering for transport, handling or transporting activities **that were undertaken in the previous fiscal year**, if any.