

Transport Canada's Client Identification Database Impacts for Radioactive Material (TDG Class 7)

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Not Legal Advice

Radiation Safety Institute of Canada Institut de radioprotection du Canada

Webinar Functionality

- Audio and video
 - During the presentation, from the presenters only
 - Captions: More>Language and speech>Turn on live captions
- Use the Chat feature to talk to discuss with everyone
- Use Q&A feature to ask questions for Q&A portion
- Posted on webinar page
 - Video, answers to questions, copy of the slides
- Follow up email will be sent
 - Topics covered, time of attendance

In This Session



- Update to the TDG Regulations
- Client Identification Database
- Who Must Register
- Registration Exemptions
 - Class 7 Details
- Due Date to Register
- Enforcement
- Information Required
- On-Going Requirements
- Q&A



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TDG Regulations

The Regulations Amending the Transportation of Dangerous Goods Regulations (Site Registration Requirements) were published in Part II of the *Canada Gazette* on October 25, 2023.

• https://canadagazette.gc.ca/rp-pr/p2/2023/2023-10-25/html/sor-dors206-eng.html

This added new regulatory requirements to the TDG Regulations that:

- Require that persons who import, offer for transport, handle or transport dangerous goods at a site located in Canada that they own or operate be registered in a new registration database if applicable
- Require that all registered persons provide administrative information and information concerning the dangerous goods and operations



Client Identification Database (CID)

- A database for persons or organizations involved in Dangerous Goods activities
- Allows "persons" to register
- Collects information about Dangerous Goods Activities
- Will be used by Transport Canada to "better assess risk, enhance overall safety measures, and facilitate effective communication and collaboration between Transport Canada and registered persons or organizations"
- No charges or fees to register





CID Registration Requirements

 Registration is required by a person (or representative for an organization) who imports, offers for transport, handles or transports dangerous goods at a site located in Canada that they own or operate







A person who imports, offers for transport, handles or transports dangerous goods

- Originating from outside Canada and passing through Canada to a destination outside Canada without any handling being done in Canada
- 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



CID Registration Exceptions Cont'd

A person who

- Conducts cross-border movements who does not have a headquarters in Canada or who does not operate a site in Canada where importing, offering for transport, handling or transporting activities take place
- Foreign carriers operating cross-border movements who do not have a headquarters in Canada or own/operate a site in Canada where dangerous goods activities take place
- Only receives dangerous goods but does not import, offer for transport, handle, or transport
- Operates one or more oil wells



CID Registration "Site" Meaning

- In the regulations, a 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
- Does not include a location where dangerous goods are used only in the scope of a person's work





CID Registration Exceptions — Class 7

Registration is not required for excepted packages, if the material

- Satisfies the conditions to be transported in an excepted package, under the CNSC's Packaging and Transport of Nuclear Substances Regulations,
- ARE in an excepted package, and
- Are accompanied by a transport document that includes the shipping name and UN number of the radioactive materials





For radioactive material (Class 7), registration is not required for

- Radio-Pharmaceuticals that have been injected in or ingested by an individual or an animal
- Material moved within a facility dangerous goods that are transported solely within a manufacturing or processing facility to which public access is controlled



CID Registration Exception Class 7 Examples

Diagnostic imaging clinic

- Receive radioactive material, but doesn't ship it or any radioactive waste outside of the clinic (sufficient decay)
- Registration is NOT required

Hospital nuclear medicine department

- Receives radioactive material, ships unloaded containers back to the supplier, ONLY as excepted packages.
- Does not dispose of radioactive waste (sufficient decay)
- Registration is NOT required

CID Registration Exception Class 7 Examples

University laboratory

- Ships out used contaminated glassware for disposal, but ONLY as excepted packages
- Registration is NOT required

University laboratory

- Ships out waste including Excepted packages and Type A packages
- Registration IS required



CID Registration Exception Class 7 Examples

Nuclear gauges

Portable gauges

- Typically stored in one location then routinely transported offsite for use using a Type A or Type B package.
- Registration IS required

Fixed gauges

- Usually mounted to equipment or piping, stay in place during use.
- If all calibration and maintenance is done on site, at the facility
 - Registration is NOT required
- If transported offsite for calibration or maintenance.
 - Registration IS required



CID Registration Due Date

- Persons have up to October 25,
 2024 to complete their registration in the database
 - This is 1 year after the amendments to the regulations came into force

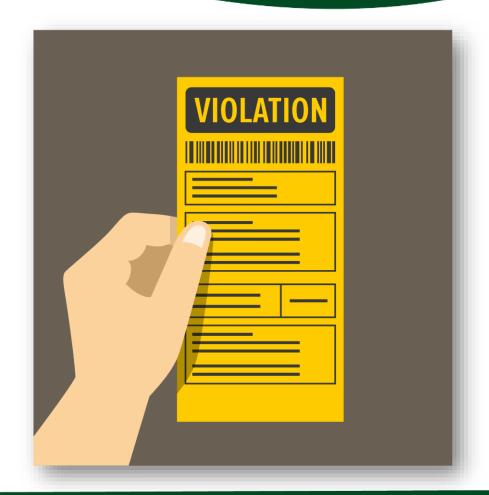
October 2024

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6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

CID Enforcement



- Same approach as other violations under the TDG Act and Regulations
- Monetary penalties are likely only to be considered for extreme or repeated offences

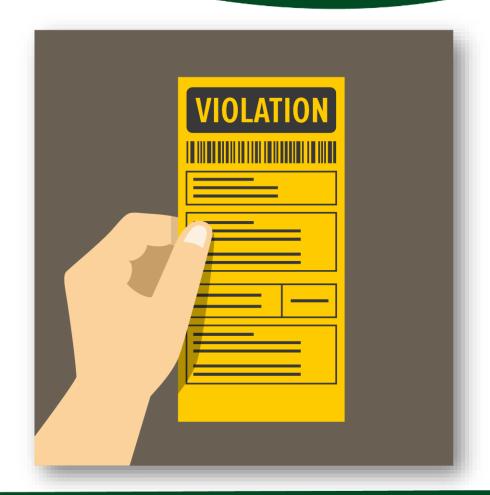


CID Enforcement



Graduated Enforcement

- First offence: inspection report identifying the violation and required time frame to come into compliance.
- Additional offenses: increasing enforcement actions ranging from contraventions (\$500-\$1,000) to criminal prosecution (up to \$50,000 for first offense).





CID Information To Provide

- Organization Information
 - CRA business number, if any
 - Legal name
 - Primary business address / address of their headquarters
 - North America Industry
 Classification System (NAICS) code
 - Voluntary / Not mandatory
- Designated contact person and alternate
 - Phone number
 - Email addresses





CID Information To Provide

- For each sites (previous fiscal year):
 - Addresses of sites where DG activities occurs
 - Mode(s) of transport
 - Road rail marine air
 - Classes and divisions of dangerous goods
 - Type(s) of DG activities
 - Import offer for transport handle transport
- Not required to provide:
 - Details/statistics on shipping, such as #
 of packages, # of shipments











CID Registration Verification

- Choose Sign-in Method
 - GCKey
 - A GCKey lets you securely access
 Government of Canada online services.
 - It includes a username and password that you choose. You must also create security questions. These steps help to keep your data secure and lets you recover your password.
 - Option to create on sign-in page of CID
 - Canadian online banking service
- Separate GCKey and email for each company you register



Transportation of Dangerous Goods (TDG) Client Identification Database (CID)

Persons who import, offer to transport, handle or transport dangerous goods in Canada must register in the TDG Client Identification Database (CID).

Please choose an option to sign in:





Francais

Don't have a username or password?

Sign up with GCKey



CID Registration Next steps

- The "wizard" will guide you through the steps of registration
- There is also a user guide online:
 https://tc.canada.ca/en/dangerous-goods/client-identification-database-cid/cid-user-guides/client-identification-database-cid-platform-user-guide

Organization Registration

1. Start

2. Organization

3. Contact(s)

4. NAICS Code(s)

5. Organization Summary

6. Site(s)

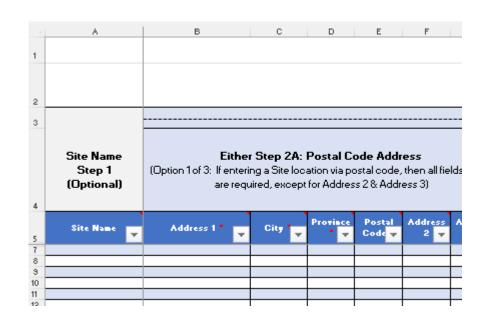
7. Complete



CID Registration Step 6 – Site(s)

- The CID has site bulk upload option - a spreadsheet to fill in and upload site information.
 - Spreadsheet download company specific one during registration.
 Example found here: https://tc.canada.ca/sites/default/files/ 2023-10/site bulk upload cid test workshe et en.xlsx
 - Procedure:
 https://tc.canada.ca/en/dangerous-goods/client-identification-database-cid/cid-user-guides/client-identification-database-cid-platform-site-bulk-upload-procedures

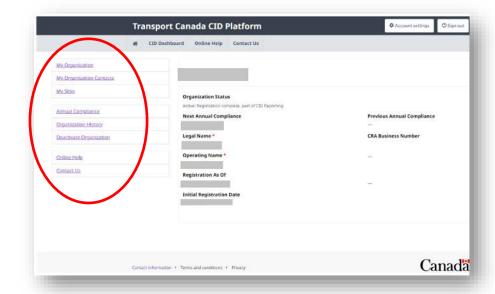




CID Afterwards



- You will have a CID Dashboard
 - Review and update details
 - Organization
 - Contacts
 - Sites
 - Dangerous Goods Activities and Classes
 - Annual renewal
 - Select "Annual Compliance"
 - Online help





CID On-Going Requirements

Yearly Renewal

- Every year, within 30 days of initial registration anniversary
- Validating and/or updating information entered

Administrative Information

 Update within 60 days after the day on which any change occurs



Resources



- Amendments to the regulations: https://canadagazette.gc.ca/rp-pr/p2/2023/2023-10-25/html/sor-dors206-eng.html
- Transport Canada's CID page: https://tc.canada.ca/en/dangerous-goods/client-identification-database-cid
- Transport Canada's CID Frequently Asked Questions Page:
 https://tc.canada.ca/en/dangerous-goods/client-identification-database-cid/frequently-asked-questions
- Transport Canada's CID questionnaire: https://tc.canada.ca/en/dangerous-goods/client-identification-database-questionnaire
- Transport Canada's CID user guide: https://tc.canada.ca/en/dangerous-goods/client-identification-database-cid-platform-user-guide
- Transport Canada CID contact page: https://tc.canada.ca/en/dangerous-goods/client-identification-database-cid/contact-us



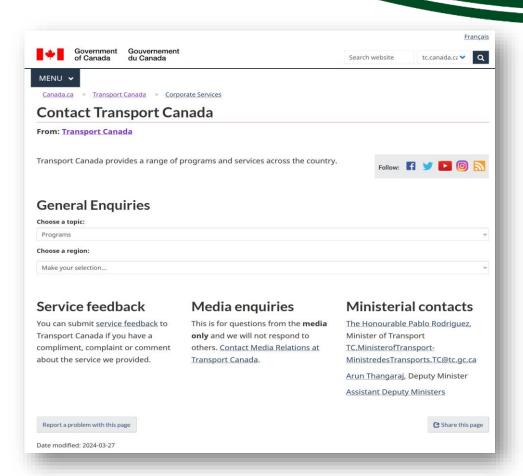
Questions? Comments?

- First addressing some questions sent during registration that weren't addressed in the presentation
- As time permits, we will address questions posted in the Q&A
- Questions we do not get to
 - Answers will be posted to our website and a link to resources emailed out





Transport Canada Contact



https://tc.canada.ca/en/corporate-services/contact-transport-canada



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