



January 24, 2024

## BULLETIN # 02-2024

January 24, 2024

### ***Transportation of Dangerous Goods Regulations Part 17 (Site Registration Requirements) coming into force October 25, 2024.***

In October 2023, Transport Canada amended the *Transportation of Dangerous Goods Regulation (TDGR)* to add Part 17 Site Registration Requirements.<sup>1</sup> This introduces a new registration requirement for sites where dangerous goods are imported, offered for transport, handled or transported. This includes a requirement for all required sites (including agri-retailers handling ammonium nitrate) to register with the Client Identification Database before October 25, 2024. Once registered, sites will need to update their information annually, based on the date of the original submission.

The TDGR defines *site* as “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”.

Certified sites under the AN and CAN Code of Practice that retail ammonium nitrate will be required to register.

#### **AN and CAN Code Protocol Amendments:**

To reflect the new regulatory requirements, amendments to SECTION D – REGULATORY REPORTING will be made to remove the former NRCAN Explosives Regulatory Division reporting requirements (as per previous communications in Bulletin #01-2023), and add the regulatory registration requirements for the Client Identification Database (CID) under TDGR Part 17.

The amended Protocol D1 will be marked by auditors as Not Applicable until the end of the regulatory transition timeline (October 25, 2024). This Protocol will only be applicable for sites retailing ammonium nitrate.

Additions to the AN and CAN Code will be as follows:

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<sup>1</sup> [Regulations Amending the Transportation of Dangerous Goods Regulations \(Site Registration Requirements\)](#), published in Canada Gazette Part II on October 6, 2023.



<b>SECTION D – REGULATORY REPORTING</b>							
<p><b><i>NOTE:</i></b> Section D1 SITE REGISTRATION REQUIREMENTS is only applicable to AN fertilizer. If the facility does not handle AN fertilizer, auditors will mark this section as “N/A”.</p>							
<b>D1</b>	<p><b>SITE REGISTRATION REQUIREMENTS</b></p> <p><i>This section applies to sellers of AN subject to the Transportation of Dangerous Goods Regulations. The registration and annual updates to the Client Identification Database (CID) are a regulatory requirement.</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">NO.</th> <th style="width: 80%;"></th> <th style="width: 10%;">Y/N</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">D1</td> <td>Records are available indicating that the site has completed its registration and annual update with Transport Canada’s Client Identification Database (CID).</td> <td style="text-align: center;"></td> </tr> </tbody> </table> <p>The site registration requirements include:</p> <ol style="list-style-type: none"> <li>a. This site ships products in conformance with TDG regulations and the shipping documents viewed verified this.</li> <li>b. This site has registered with Transport Canada’s Client Identification database (CID).</li> <li>c. This site has completed their annual update with Transport Canada’s Client Identification database (CID).</li> </ol> <p>Additional guidance for Section D will be available in the AN and CAN Code Implementation Guide.</p> <p><i>Compliance will be indicated through examination of the documentation records indicating that the registration (and annual updates) for Transport Canada’s Client Identification Database (CID) have been completed within the last 12 months.</i></p>	NO.		Y/N	D1	Records are available indicating that the site has completed its registration and annual update with Transport Canada’s Client Identification Database (CID).	
NO.		Y/N					
D1	Records are available indicating that the site has completed its registration and annual update with Transport Canada’s Client Identification Database (CID).						

For informational purposes, please note that farmers, as end users of ammonium nitrate fertilizer, are not required to register as sites under the CID.

Transport Canada FAQs and links to find additional information and resources on their website are included on page 3-4 of this Bulletin.

Should you have any questions with respect to your audit, please do not hesitate to contact the Code Project Manager, Anthony Laycock via email at [manager@awsa.ca](mailto:manager@awsa.ca). You may alternately contact Fertilizer Canada using the coordinates below.

Regards,

Katherine Kennedy  
Manager, Policy & Regulatory Affairs



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## **Transport Canada Resources:**

### **Where do you register?**

Visit Transport Canada's website at:

<https://tc.canada.ca/en/dangerous-goods/client-identification-database-cid>

### **What information will be required when registering?**

Note: The data required to be submitted is always from the previous Fiscal Year.

- (a) the business number assigned to them by the Canada Revenue Agency, if any;
- (b) their name and the address of their headquarters;
- (c) the phone numbers and email addresses of both a contact person and their replacement when absent;
- (d) the addresses of all sites where dangerous goods are imported, offered for transport, handled or transported;
- (e) Select the applicable NIACS code (North American Industry Classification System).
  - For example, #418390 = Agricultural Chemical and Other Farm Supply Merchant Wholesalers.
- (f) the mode of transport of dangerous goods used at each site;
  - Road
  - Rail
  - Marine
  - Air
- (g) 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, for example:
  - Class 3 – Flammable Liquids
  - Class 5.1 – Oxidizers
  - Class 6.1 – Toxic Substances
  - Class 8 – Corrosives
  - Class 9 – miscellaneous products substances or organisms
- (h) for each site, the importing, offering for transport, handling or transporting activities that were undertaken in the previous fiscal year, if any.
  - Import
  - Handle
  - Offer for Transport
  - Transport



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Transport Canada has provided a process including an EXCEL spreadsheet for business to use to submit this data.

### **Who submits the data:**

Compliance lies with the site manager to complete the registration and show evidence of completion to the AWSA auditor.

Locations with multiple locations may have this completed by their head office. In these cases, a letter (or documentation) from their head office should be available to show the AWSA auditor.

### **When are updates required?**

Once registered, you will need to update and confirm your registration every year. You will receive an email reminder from Transport Canada to complete this task 30 days before the company's anniversary date. Deadline to complete the annual renewal update is 30 days after the company anniversary date.

Review and update the following six (6) requirements to complete the annual renewal update:

1. Organization data requirements are up to date.
2. All existing sites, and site information requirements are up to date.
3. All new sites, and subsequently information, have been added.
4. All sites that were active, and that are now inactive, have been deactivated.
5. All sites that were inactive, and are now active, have been reactivated.
6. All sites that were part of a sale or merger, have been actioned as sold or merged.

### **Where do I get more Information?**

Visit Transport Canada's website:

<https://tc.canada.ca/en/dangerous-goods/client-identification-database-cid/initial-registration>