



TDG Bulletin

Alternative Oversight Activities: Remote Oversight

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Alternative Oversight Activities: Remote Oversight

Purpose

Transport Canada's Transportation of Dangerous Goods (TDG) Directorate has issued guidance to its inspectorate on conducting remote oversight activities as a result of the COVID-19 pandemic.

This bulletin is intended to provide information and answer questions from industry stakeholders on transportation of dangerous goods remote oversight activities.

Below are answers to some questions you might have regarding these remote oversight activities.

Ways your company may be contacted and by whom

As an industry stakeholder, your company may be contacted by a Transport Canada (TC) dangerous goods inspector to conduct oversight activities remotely.

To initiate contact with your company, a TC dangerous goods inspector may use the following three options which will begin the process of a remote oversight activity:

- Schedule a telephone interview to initiate an oversight activity.
- Submit an email request to review company documentation.
- Use virtual tools and communication applications (video conference or Webex can be used to assist TC dangerous goods inspectors with remote oversight activities).

Certain Means of Containment (MOC) facilities may also be determined to be suitable for telephone or virtual remote oversight activities by TC dangerous goods inspectors.

Please note: as per Paragraph 13(1)(a) of the *Transportation of Dangerous Goods Act, 1992* no person shall fail to comply with any reasonable request of a TC dangerous goods inspector.

Is there flexibility in scheduling the remote oversight activity?

Yes. TC managers and inspectors take into account many variables when planning oversight activities, therefore there are no strict timing requirements beyond regular business hours.

Assuming that a company is deemed suitable for a remote oversight activity, there is flexibility in scheduling the inspection.

Information requested during a remote oversight activity vs an on-site inspection

TC dangerous goods inspectors will be requesting similar information for confirming compliance during remote oversight activities as they would for on-site inspections. This could include:

- Reviewing company details such as addresses, contact numbers, confirming Emergency Response Assistance Plans (ERAPs) and dangerous goods on-site as well as procedures, reports, records, equivalency certificates, or exemptions in use.
- Reviewing shipping documents for a given period, training certificates and records for employees, reports, safety data sheets (SDS) and photos.
- For MOC facilities, reviewing quality management systems and procedures, publications, calibration certificates, inspection and test records and photos.

Timeframe between initial contact and when the remote oversight activity is completed

There is no set timeframe between when a TC dangerous goods inspector initiates contact with the company and the completion of an oversight activity by an inspector.

The length of the oversight activity will depend on each company's particularities and will be performed at a reasonable time.

You should disclose to the TC dangerous goods inspector if your company has temporarily ceased operations, or if the site is still operating but is unable to support an oversight activity due to the COVID-19 pandemic. The inspector will take this into consideration and may choose to delay oversight activities if necessary.

Keeping copies of shipping documents and training records

Both consignors and carriers are required to keep copies of shipping documents as per [Section 3.11 of the TDG Regulations](#). Shipping documents may be kept as electronic copies.

Consignors and carriers must be able to produce copies of any shipping documents within 15 days of a written request from a TC dangerous goods inspector. Also, consignors must keep copies of shipping documents for two years from the date of document preparation and provision to a carrier.

As described in Section 3.11 of the TDG Regulations, carriers must be able to produce copies of shipping documents for two years after the dangerous goods are no longer in transport, with some exceptions.

As per Part 6 of the TDG Regulations, a person who handles, offers for transport or transports dangerous goods must be trained: as per Section 6.6 of the TDG Regulations an employer or self-employed person must then also keep a record of that training or statement of experience as well as a copy of a training certificate from the date it is issued until two years after the date that it expires.

Employers (including self-employed persons) must be able to produce copies of the training certificate to the inspector and, if applicable, a copy of the record of training or the statement of experience and a description of the training material used in the person's training within 15 days of a request in writing by a TC dangerous goods inspector.

Contact us

For more information or suggestions to amend this document please contact:

TDG Safety Awareness

E-mail: TC.TDGSafetyAwareness-SensibilisationalasecuriteduTMD.TC@tc.gc.ca

To confirm the identity of the TC dangerous goods inspector contacting you, or for questions about the TDG Regulations, contact the Transport Canada Dangerous Goods Regional Office in your region:

Region	Telephone number	Email address
Atlantic	1-866-814-1477	TDG-TMDAtlantic@tc.gc.ca
Quebec	1-514-633-3400	TMD-TDG.Quebec@tc.gc.ca
Ontario	1-416-973-1868	TDG-TMDOntario@tc.gc.ca
Prairie and Northern	1-888-463-0521	TDG-TMDPNR@tc.gc.ca
Pacific	1-604-666-2955	TDGPacific-TMDPacifique@tc.gc.ca