



Transportation of Dangerous Goods Directorate  
L'Esplanade Laurier  
300 Laurier Avenue West  
Ottawa, Ontario  
K1A 0N5

Direction générale du transport des marchandises dangereuses  
L'Esplanade Laurier  
300, avenue Laurier Ouest  
Ottawa (Ontario)  
K1A 0N5



Following the declaration of a pandemic outbreak of a novel coronavirus (COVID-19) by the World Health Organization on March 11, 2020, Transport Canada issued several temporary certificates to address various issues regarding the transportation of dangerous goods related to the pandemic. With the exception of TU 0764: Test Samples for COVID-19, which is set to expire on December 31, 2020, all other temporary certificates are set to expire on September 30, 2020.

Below are a series of tables that summarize all the temporary certificates that were issued. They also identify if the temporary certificate will be renewed beyond its expiration date and provide a rationale for Transport Canada's decision.

Transport Canada is asking stakeholders to identify and raise any anticipated issue with the decisions described in the attached tables. Where applicable, please describe in detail what those issues are and the reasons why your company or industry sector cannot comply with the *TDG Regulations*.

**Number:** TU 0750: Training

**Description:** Several companies expressed to Transport Canada that it was difficult to either obtain or provide the recurrent training required by the *Transportation of Dangerous Goods Regulations (TDG Regulations)* to their employees. As such, this temporary certificate allows a person with a training certificate that expires after March 1, 2020 to continue to handle, offer for transport, or transport dangerous goods with an expired training certificate, as long as the person has sound knowledge of all TDG aspects related to their duties.

**Temporary certificate renewal:** TU 0750 will **NOT be renewed** past September 30, 2020.

**Reasoning:** TU 0750 will NOT be renewed because the provincial and territorial governments have already allowed the progressive reopening of industry. As such, employees should be able to obtain the necessary training. Adaptive measures may be required, such as using face masks for in person training or utilizing technology to offer virtual training sessions.

**Stakeholder Comments:**



**Number:** TU 0751.1: Testing and Inspection Requirements (Renewal 1)

**Description:** Some means of containment facilities temporarily closed their business or are limiting travel for their employees who perform mobile inspections. As such, this temporary certificate allows means of containment, which have not been inspected or tested in accordance with Part 5 of the *TDG Regulations*, to be used for the transportation of dangerous goods. In order to use the temporary certificate, the inspection and test marks on the means of containment have to be visible and legible and were valid:

- on February 28, 2019 in the case of cylinders, spheres, tubes, UN pressure receptacles, multiple-element gas containers, and other pressure receptacles containing dangerous goods included in class 2.1 or class 2.2, and selected and used in accordance with CSA B340 and CSA B342, or
- on February 29, 2020 for all other containers;

**Temporary certificate renewal:** TU 0751.1 will **NOT be renewed** past September 30, 2020. However, Transport Canada will consider a regional approach by extending the temporary certificate for remote locations and indigenous communities. This will be assessed on a case by case basis, as there is concern that individuals performing inspections and testing in remote locations would be required to self-isolate for 14 days upon arrival. This would greatly impact the ability of industry to perform adequate inspections and testing at these locations.

**Reasoning:** As the Canadian economy has started to open up, Transport Canada believes it is no longer necessary to continue allowing means of containment to be kept in operation without being subject to inspections and testing. Furthermore, some highway tank facilities perform the bulk of their testing and inspections in the summer months because of the more favorable weather condition. As such, an extension would not benefit facilities performing highway tank testing and inspections.

**Stakeholder Comments:**



**Number:** TU 0752.1: Hand Sanitizer (Modification 1)

**Description:** Canadian industry has been asked to reorganize its operations to manufacture essential medical supplies such as masks, ventilators and hand sanitizer. A temporary certificate was issued since many new producers of hand sanitizer did not have the required TDG training or the appropriate resources to handle, offer for transport or transport hand sanitizer in compliance with the TDG Regulations. The temporary certificate authorizes, under certain conditions, the handling, offering for transport, or transport of hand sanitizer in non-standardized packaging, without TDG labels, without shipping documents, and without TDG training.

**Temporary certificate renewal:** TU 0752.1 **will be renewed** past September 30, 2020.

**Reasoning:** In anticipation of the continuation of the COVID-19 pandemic, Transport Canada believes that the certificate should remain in effect until the demand for hand sanitizer stabilizes. Furthermore, hand sanitizer is an essential medical supply and the demand for this household product will likely continue to be high for the foreseeable future.

**Stakeholder Comments:**



**Number:** TU 0753: Canada Post Corporation Authorization – Shipping Hand Sanitizer by Air

**Description:** Under the *TDG Regulations*, Canada Post Corporation is restricted from transporting a number of dangerous goods by air, such as hand sanitizer. In order to allow Canada Post Corporation to contribute to the pressing need to provide hand sanitizer to remote communities, the temporary certificate authorizes the handling, offering for transport, or transport of hand sanitizer by the Canada Post Corporation by air to remote communities. Furthermore, Canada Post has indicated to Transport Canada that in certain remote communities, it is the only entity that accepts products for delivery.

**Temporary certificate renewal:** TU 0753 **will be renewed** past September 30, 2020.

**Reasoning:** In anticipation of the continuation of the COVID-19 pandemic, we believe that the certificate should remain in effect until the end of the pandemic to ensure all Canadians have access to this essential medical supply.

**Stakeholder Comments:**



**Number:** TU 0754: Transporting Hand Sanitizer by Air

**Description:** Canadian industry has been asked to reorganize its operations to manufacture essential medical supplies such as masks, ventilators, and hand sanitizer. However, many new producers of hand sanitizers did not have the required TDG training or the appropriate resources to handle, offer for transport, or transport such dangerous goods in compliance with the *TDG Regulations*.

Under normal circumstances, hand sanitizer is typically transported by road vehicle. However, the shortage of supply at the beginning of the pandemic forced distributors to look for other ways to quickly deliver their product to market and in some cases, beyond their normal service area. This created a sudden increase in interest in moving hand sanitizer by air.

To respond to this unprecedented situation, and in order to allow air carriers to contribute to the pressing need to provide hand sanitizer to communities across Canada, the temporary certificate authorizes the handling, offering for transport, or transportation of hand sanitizer by air, under certain conditions.

**Temporary certificate renewal:** TU 0754 will **NOT be renewed** past September 30, 2020. However, Transport Canada is open to considering revising the temporary certificate for indigenous communities or remote areas.

**Reasoning:** Transport Canada believes there is no reason to continue allowing the transportation of hand sanitizer by air without fully complying with the TDG Regulations. The hand sanitizer industry has ramped up production of hand sanitizer and there should no longer be a need to use this transportation mode to quickly deliver hand sanitizer across Canada. Road transport should be sufficient for effective distribution across Canada.

**Stakeholder Comments:**



**Number:** TU 0764: Test Samples for COVID-19

**Description:** Canadian health care workers have been tasked with conducting wide spread testing for COVID-19. To ensure that health care professionals are able to respond to suspected cases of COVID-19 as rapidly as possible, it is important that test samples be transported to laboratories for analysis without delay.

As these samples are dangerous goods, they must be handled, offered for transport, and transported in accordance with the *TDG Regulations*, which require that samples be packed in P650 packaging. However, it has become increasingly difficult to obtain this type of packaging.

Furthermore, since the samples are dangerous goods, appropriate TDG training is required for the handling, offering for transport, or transport of the samples. As testing has increased and a large number of non-traditional screening sites have been opened, it is challenging to ensure that everyone involved in the transport chain has received the appropriate training.

To assist medical professionals in responding to this unprecedented situation, the temporary certificate authorizes the handling, offering for transport, or transporting of dangerous goods that are COVID-19 test samples, in non-standardized packaging and without TDG training, under certain conditions.

**Temporary certificate renewal:** TU 0764 expires on December 31, 2020.

**Reasoning:** In anticipation of a resurgence of COVID-19 cases, TC believes that the certificate should remain in effect until it is feasible for all personnel to receive proper training and an adequate supply of standardized packaging is available, thereby ensuring the seamless and timely transportation of COVID-19 test samples. Furthermore, a focus group will be established between Transport Canada, the Public Health Agency of Canada (PHAC) and the Canadian Public Health Laboratory Network (CPHLN) to determine if the TDG Regulations should be amended to reflect the requirements of TU 0764.

**Stakeholder Comments:**