
Hazardous Waste Movement Document and Transboundary Shipments - Recent Developments

Purpose

This information bulletin outlines how the federal regulatory changes and the launch of the Canadian Notice and Movement Tracking System may impact the management of movement document requirements for shipments of hazardous wastes in Manitoba.

Background

Environment and Climate Change Canada (ECCC) has consolidated the Cross-border Movement of Hazardous Waste and Hazardous Recyclable Material Regulations (SOR/2021-25), which came into force on October 31, 2021. On September 24, 2019, ECCC implemented the movement tracking module of the Canadian Notice and Movement Tracking System (CNMTS). Two amendments to the federal Transportation of Dangerous Goods Regulations (TDGR) came into effect in 2014 and affect the version of movement documents (manifests) used by the provinces and territories and the version of the movement document prescribed by ECCC.

This information bulletin summarizes many of the changes contained in these regulations.

Applicability

This bulletin is primarily intended for use by the consignors, carriers and consignees of hazardous waste shipments.

Disclaimer: This bulletin does not replace the text of any act or regulation in any way, nor does it replace any legislation and has no legal force in itself. This bulletin is designed only as an information guide, to be read in conjunction with applicable federal and provincial legislation.

Distribution of completed movement documents

Does Manitoba Environment, Climate and Parks require consignors and consignees of transboundary shipments of hazardous wastes to provide copies of completed movement document forms (copy 1 and 3) to the department?

The federal Cross-border Movement of Hazardous Waste and Hazardous Recyclable Material Regulations, SOR/2021-25, require the consignors and consignees of transboundary shipments of hazardous wastes or hazardous recyclable materials to provide copies of completed movement document to the authorities of the province where the shipping or receiving facility is, if those authorities ask for it.

Manitoba Environment, Climate and Parks (the department) does not require the consignors and consignees of hazardous waste shipments to submit copies of movement documents to the department unless specifically requested (e.g. as follow-up to a site inspection, after a PCB waste shipment, as required under section 25 of the Hazardous Waste Regulation, M.R. 195/2015).

As per the Hazardous Waste Regulation, M.R. 195/2015, these copies must be kept for at least two years and produced to an environment officer or inspector on request.

Canadian Notice and Movement Tracking System (CNMTS)

What is a Canadian Notice and Movement Tracking System (CNMTS)?

CNMTS is the database and management system used by ECCC to collect, store, and process transboundary shipments of hazardous waste and hazardous recyclable material information.

This online self-service application allows companies to use the module to create and submit movement document information online for international shipments and generate interprovincial movement documents.

Does the movement document template of the CNMMS acceptable to Manitoba provincial regulatory requirements?

The template of the movement document generated in CNMMS is acceptable to the department. **However**, if a Manitoba consignor wishes to use a CNMMS generated movement document for transboundary shipments and has to record **more than four types of wastes**, the consignor has to **use an additional** movement document to record those additional waste types in order to comply with the Manitoba Provincial regulatory requirements.

Note: CNMMS module provides provision to record additional waste types on the movement documents. However, the Hazardous Waste Regulation, M.R. 195/2015 [Subsection 18 (4)] requires that if more than four types of hazardous waste from one consignor are to be transported in a single shipment, additional movement documents need to be used to record the hazardous wastes.

Is it mandatory to use CNMMS generated movement documents for transboundary shipments of hazardous wastes?

- **For interprovincial shipments**, it is an option to use CNMMS movement document template. If not using CNMMS as the source of movement documents, then the movement document approved by the department must be used for interprovincial shipments originating from Manitoba.

Any user with a Government of Canada key (GCKey) and a profile connected to an organization in the ECCC Single Window Information Manager can access the CNMMS and generate blank interprovincial movement documents.

- **For international shipments**, the use of CNMMS to create your movement documents became mandatory with the coming into force of the federal Cross-border Movement of Hazardous Waste and Hazardous Recyclable Material Regulations, SOR/2021-25.

Is it possible to use CNMMS to generate movement document for intra-provincial shipments of hazardous waste?

Since, CNMMS is a federally managed system used for international and interprovincial (transboundary) shipments of hazardous wastes, the system cannot be used for generating movement documents for intra-provincial shipments. Intra-provincial shipments continue to be regulated by the provinces and territories.

For intra-provincial shipments, the movement documents continue to be available for purchase from the following address in Manitoba:

Geo Manitoba (Canada Map Sales)
Manitoba Agriculture and Resource Development
1007 Century Street, Winnipeg MB R3H 0W4
Tel: (204) 945-6666 Toll free: 1-877-627-7226 Fax: 204-945-1365
Email: mapsales@gov.mb.ca Website: CanadaMapSales.com - Home

Where can I obtain further information on CNMMS and the movement tracking module?

For further information on ECCC's CNMMS and the movement tracking module, please contact ECCC:

Waste Reduction and Management Division
Environment and Climate Change Canada
351 St. Joseph Boulevard, 9th Floor
Gatineau, QC K1A 0H3
Tel: 1-844-524-5295 Email: ec.dm-md.ec@canada.ca
Website: www.canada.ca/hazardous-waste

Fact Sheets on International movement of hazardous wastes or recyclables for variety of stakeholders can be accessed at the following link:

[Fact sheets: international movement of hazardous wastes or recyclables - Canada.ca](#)

Changes to the Federal Transportation of Dangerous Goods Regulations (TDGR)

Does the amendment made to the federal Transportation of Dangerous Goods Regulations (TDGR), which came into effect in 2014, affect the form of the Movement Document currently in use?

Two amendments were made to the TDGR in 2014 that affected the form of Movement Document. The amendments that affected the movement documents were:

a) Amendment to the consignor certification statement:

[Regulations Amending the Transportation of Dangerous Goods Regulations (Update of Standards), published in the Canada Gazette Part II, Vol. 148, No.14 as SOR/2014- 152]

In consultation with provinces, territories, ECCC and Transport Canada, movement document has been updated to reflect the TDGR amendment to the consignor certification statement. As a result, the consignor certification statement in the current version of movement documents complies with the TDGR requirements.

Consignor certification statement in the current version of movement documents reads:

"I certify that the information contained in Part A is correct and complete. I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations."

b) Amendment to the order of shipping information:

[Regulations Amending the Transportation of Dangerous Goods Regulations (Update of Standards), published in the Canada Gazette Part II, Vol. 148, No.27 as SOR/2014-306]

In order to meet the TDGR requirements and to qualify as a TDG shipping document (as per Part 3, Section 3.5 of the TDGR), the UN Number must precede the Shipping Name.

However, the current movement document uses a different order. In which, the Shipping Name and Class precede the UN Number.

Movement documents reflecting the change to the order of shipping information (to satisfy the TDGR requirements) is not available at this time. Movement document will remain in its current format until further notice.

To meet the regulatory requirements of Manitoba and the TDGR for shipments of hazardous wastes that are also dangerous goods under the TDGR, the following options can be considered:

- Option 1 - Use the current movement document to satisfy the provincial legislation and attach another sheet to your movement document with the description of the dangerous goods as required by Part 3, section 3.5 of the TDGR to satisfy the Shipping Document requirements.
- Option 2 Enter the UN number in Box 3 (Prov. Code) of Part A of the movement document and cross out and replace the title of that column (Box 3 - Prov. Code) with UN No.

For more information on the TDG regulatory amendments, please email TDG-Transport Canada at tdg-tmd@tc.gc.ca or visit the TDG website at: <https://tc.canada.ca/en/dangerous-goods/transportation-dangerous-goods-canada>.

Contact information:

For additional information on the contents of this information bulletin, please contact:

The Hazardous Waste Program
Environmental Compliance and Enforcement Branch
Manitoba Environment, Climate and Parks
1007 Century Street, Winnipeg, MB R3H 0W4
Email: raj.rathamano@gov.mb.ca