

Transportation of Dangerous Goods: Optimization of Virtual versus On Site Inspections

Ministerial Presentation

Ottawa, June 1, 2022



OVERVIEW

- Decision Sought
- Background
- Strengths and Weaknesses of Virtual Inspections
- Considerations
- Next Steps
- Recommendations

DECISION SOUGHT

- Seeking your approval to implement strategic risk-based approach to all TDG inspections to increase the proportion of virtual oversight activities from 10% to 20%, and return to consider additional increases in 12 months.

BACKGROUND

- Transportation of Dangerous Goods (TDG) Program ensures public safety in the movement of dangerous goods.
- TDG could enhance efficiency in conducting inspections by further leveraging current performance-based regulatory framework.
- In advent of the COVID-19 pandemic, TDG Directorate immediately reacted and reassessed its inspection approach by transitioning to predominantly remote (virtual) inspections.
- While the dramatic shift to virtual inspections over the course of the COVID-19 pandemic appears to support public safety, the short duration of this approach is not deemed sufficient to inform such large scale changes on a more permanent basis.
- Moving forward, the Department proposes to implement a longer-term approach that employs the most cost-effective ratio of virtual to on-site inspections that protects public safety and is less disruptive to industry.
- TDG could further leverage the key learnings from the inspection approach used during the COVID-19 pandemic to strengthen its oversight activities.

VIRTUAL INSPECTIONS

Strengths:

- Flexibility
- Cost savings
- Efficiency
- Employee safety

Weaknesses:

- Less traditional oversight
- Complex process
- Stakeholder compliance

CONSIDERATIONS (1/2)

- Adopt a strategic risk-based approach to TDG inspection to incorporate virtual components to all inspections.
- Refine criteria for high vs low-risk sites:
 - Virtual inspections limited to low-risk sites (low volumes, low non-compliance);
 - On-site inspections reserved for higher-risk sites.
- TDG to leverage the key learnings from the inspection approach used during the COVID-19 pandemic to strengthen its oversight activities.
- Continued training and enhanced technology to support implementation.
- Monitor new strategic risk-based inspection framework.
- Knowledge of site locations and current stakeholder data to improve TC's ability to identify areas of risk.

CONSIDERATIONS (2/2)

- Target outreach, awareness, and consultation efforts to improve communications on emerging issues and safety measures to avoid perception of increased risk.
- Stakeholder policy consultations are planned to start summer 2022 and will continue through fall 2022.
- TC will engage industry and other stakeholders throughout the policy development process and ensure comprehensive consultation on policy options / recommendations.

NEXT STEPS



- Refine strategic risk-based inspection framework.
- Consultation with stakeholders.
- Finalize analysis of comments received during the consultation.
- Develop a outreach strategy and guidance material.
- Progress report in twelve (12) months.

RECOMMENDATIONS

- To approve implementation of strategic risk-based approach to all TDG inspections to increase the proportion of virtual activities from 10% to 20%.
- To meet to discuss the results of implementation in twelve (12) months.

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