

Via email: consultation@cnscccsn.gc.ca

October 27, 2014

Brian Torrie
Director General
Regulatory Policy Directorate
Canadian Nuclear Safety Commission
280 Slater Street
Ottawa, ON K1P 5S9

Dear Mr. Torrie,

Re: Packaging and Transport of Nuclear Substances Regulations (2014)

Thank you for the opportunity to comment on the coming changes to the Packaging and Transport of Nuclear Substances Regulations. The Canadian Trucking Alliance (CTA) is a federation of provincial trucking associations, representing a broad cross-section of the trucking industry. CTA represents approximately 4,500 carriers, owner-operators and industry suppliers across the country. CTA members are engaged in the transport of all commodities, including the transport of materials covered by these regulations.

In general, CTA is supportive of the proposed changes to the Packaging and Transportation of Nuclear Substance Regulations and the direction you are going. However, several points have been raised by our members, which in general terms relate to the (1) impact direction of harmonizing to the United States rules for domestic shipments (2) The ability and management of Canadian enforcement officials to deal with Level 6 Commercial Vehicle Safety Alliance (CVSA) inspections (3) Licensing threshold for carrying certain goods. On these points, CTA would like to better understand the impact the proposed changes will have.

Towards these ends, CTA would like to arrange a call with you or the appropriate member of your staff to have a general discussion on the proposed changes, and the transportation of nuclear material by truck more generally.

In the meantime, please do not hesitate to contact me directly to discuss further.

Sincerely,



Stephen Laskowski
Senior Vice President