

## ***Big Changes to the CRN system during COVID-19***

As all of us adjust rapidly to the new realities of social distancing and work-from-home, governmental and non-governmental pressure regulatory authorities have entered the age of the internet and the 20<sup>th</sup> century.

Prior to COVID-19 most of the government authorities had only just begun electronic submission on a low-key pilot basis, some as recently as January 2020 as in the case of Technical Safety BC, and some not at all as in the case of ACI Central.

Each safety authority has its own system, some more developed than others, some protective of the submitter's privacy and confidentiality, and some not as much.

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### **Easier National CRN approval!**

Prior to January 2020 most pressure regulatory authorities conducted independent technical reviews even when a reciprocal application for approval of a CRN was made. A reciprocal application is an application for a CRN in another province or territory of Canada after one or more safety authorities have first issued a CRN. Now every safety authority, with the exception of Alberta's ABSA.ca and ACICRN.com (representing 7 provinces/territories), explicitly accept reciprocal approvals.

However, beware that unless a reciprocal approval is explicitly requested at the time of submission, a technical review may proceed anyway.

**Contact TRG for information.**

### **Notarization of statutory declarations temporarily waived**

When COVID-19 began Titan Research Group heavily lobbied a safety authorities to eliminate the requirement of physical in-person notarization of statutory declarations (SDs) used in fitting registration applications, a requirement by all safety authorities as part of the CRN application process. All safety authorities have come onboard with this waiver provided that reasoning is given at the time of application that social distancing guidelines under COVID-19 are in force and it is unsafe to notarize.

**Contact TRG for information.**



### **UnifiedInspection.com training site launched**

Unifiedinspection.com is a new training site that is exclusively online and provides live and self-paced courses aimed at transferring know-how to the public whether you are a layperson, an ASME National Board Authorized Inspector, a licensed piping system inspector, and engineer, or a plant owner, project manager, installation contractor or manufacturer.

Our courses are delivered by ASME codes and standards committee members, and experts in virtually every vertical market including: Oil & gas, drinking water and waste water treatment, aggregates and cement, mining and minerals, Biopharmaceutical systems, Food and beverage production, Power generation, Boiler, Pressure vessel and piping system inspection to name a few.

For more information Contact: [info@unifiedinspection.com](mailto:info@unifiedinspection.com)

Or visit: [www.unifiedinspection.com](http://www.unifiedinspection.com)

# Going digital ... continued from page 1

For example, [www.TSSA.org](http://www.TSSA.org) currently accepts electronic submissions made in pdf format by email exclusively under its guidelines published [here](#). Everyone knows the risks of sending proprietary or confidential data over email, and if in doubt, see [this article](#).

[www.TechnicalSafetyBC.ca](http://www.TechnicalSafetyBC.ca) (TSBC) has developed a "Register Your Design" portal on its design registration page. This portal requires first a registration, followed by a non-automated acknowledgement by a TSBC providing a login id login link. Thereafter, unlocked and unencrypted pdfs may be uploaded to the portal and some additional fields and disclaimers filled out and accepted.

[www.ACICENTRAL.com](http://www.ACICENTRAL.com) was lobbied to re-open in March and have since indicated on their website an email address [aci@eastlink.ca](mailto:aci@eastlink.ca) for electronic submission and require pdfs only. Send more than one email if your total submission is too large.

[www.ABSA.ca](http://www.ABSA.ca) provides an electronic submission help page that admits its own complexity, but provide [guidelines](#) for navigating its process. However it is essentially an [email submission system](#).

Quebec ([enregistrementdesplans@rbq.gouv.qc.ca](mailto:enregistrementdesplans@rbq.gouv.qc.ca)), Saskatchewan ([designsubmission@tsask.ca](mailto:designsubmission@tsask.ca)), Manitoba safety authorities utilize email submission.

In brief, the safety authorities are taking baby steps toward secure, private and safe submission methods that better postal mail keeping in mind the following general restrictions:

- Zipped files are not accepted
- Encrypted links or links in general to like WeTransfer are not accepted.
- PDFs are preferred
- unencrypted email remains the method despite [security vulnerabilities](#).

**Contact TRG for more information.**



## Popular FAQs...

There are two types of exemptions. One are those that are well documented in regulations, director's orders, Minister's orders, safety authority websites, or even their newsletters. Another are those exemptions that are buried in the detail of a more complex pressure equipment design or piping system Process Instrumentation and control diagram (P&ID). For example, category A, B, C and G fittings are exempt from registration provided they are listed in the relevant code (see our last newsletter on this subject), in four (4) provinces. Recently Agricultural applications were exempt from CRN requirements, however that will no longer be true as of July 2021 in at least one province.

The most hairy of the exemptions are those that involve technical expertise and knowledge of pressure system design and safety. TRG has such expertise.

**Ask TRG before applying for a CRN.**

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## Popular FAQs

Bottom line: Canadian licensed professional engineers do not have the same rights as engineers in the USA when it comes to stamping pressure equipment and system designs as safe for construction...this is a safety authority role.

In Canada a fitting is defined as a wide array of pressure appurtenances from elbows and tees, to sight glass and level sensors, small vessels, strainers, etc.

Bottom line: No. Obtaining a CRN is not necessarily trivial. All fitting manufacturers require at minimum a valid QA system that has been audited by an acceptable 3<sup>rd</sup> party. Not all safety authorities accept all QA systems.

**Ask TRG before applying.**

Not all CRNs are created equal. A fitting CRN has a decade before it expires and needs renewal, whilst a pressure vessel registration never expires unless decommissioned, and finally a piping system registration is geographically specific and requires a certificate of authorization to apply. See our [CRN map](#).