

SECTION 4 - SUPPLEMENTAL VERIFICATION PROCEDURES

SECTION 4 – Laboratory and Scientific Services Directorate

Procedures for Submitting and Shipping Samples

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Other Stakeholders



Laboratory and Scientific Services Directorate Procedures for Submitting and Shipping Samples

The Laboratory and Scientific Services Directorate (LSSD) is the scientific arm of the CBSA. It offers a diverse range of scientific, analytical and technical advisory services to the Canada Border Services Agency (CBSA), other government departments, and provincial and international organizations. These services support the administration of tax, border and trade policies, which in turn impact on revenue generation, implementation of trade policies, competitiveness of Canadian industry and the protection of Canadian society against the illegal movement of goods.

Analysis of Industrial Commodities

Laboratory analysis involves more than the chemical, physical, instrumental and microscopic examination of products. In addition, background and literature searches are sometimes required to obtain information concerning the manufacture and intended usage of the products. All the information is then related to the provisions of the legislation. The analytical casework conducted by the Industrial Commodities Division of the LSSD is described below:

Sample Analysis may include:

- Background and literature searches on the commodity;
- Determination of the chemical composition and physical properties of the commodity;
- Determination of the manufacturing process used to produce the product;
- Relation of analysis to legislation; and
- Issuing an official laboratory report.

LSSD conducts analyses to assist CBSA clients in fulfilling their mandate related to:

- Tariff Classification;
- Post-Release Verification;
- Origin Determination;
- Anti-dumping and Countervailing legislation;
- Contraband and Intelligence, including investigations; and
- Appeals





Submission of Samples

It is the policy of the CBSA that all samples submitted to the LSSD shall be accompanied by appropriate supporting documentation and product literature in accordance with the standards and procedures contained in this section.

It is the responsibility of the CBSA employee who requests and receives samples for the CBSA to:

- ✓ Forward all non-hazardous, non-liquid samples for analysis to LSSD via inter-office or regular mail or request the importer/manufacturer to forward the samples directly to LSSD by regular mail or courier;
- ✓ In the event that the importer/manufacturer or broker have been requested to submit samples directly to LSSD, the CBSA client must ask them to submit a covering letter with the sample they are submitting indicating the exact name of the sample, the name, address and phone number of the CBSA client who requested the sample, and the regional reference number;
- ✓ Send, or request the importer or broker to send hazardous or liquid samples via a courier (not through Canada Post regular mail) directly to LSSD. Include or ask the broker, importer or manufacturer to submit all safety and handling information with the sample such as Material Data Safety Sheets.
- ✓ Return unsolicited samples to the importer/broker unless it can be determined from information on the outer package, or by calling the importer or broker, that the samples are hazardous. Hazardous products should be sent to and will be disposed of by the Laboratory; and
- ✓ Adhere to the shipping, storage and disposal procedures outlined in this section.

It is the responsibility of the LSSD's Clients to:

- ✓ Apply the relevant policies and procedures for submission of samples to LSSD;
- ✓ Develop procedures to supplement and, if necessary, complement LSSD procedures for submitting and shipping samples; and
- ✓ Ensure that health and safety guidelines are adhered to.

It is the responsibility of the Director, Industrial Commodities Division to:

- ✓ Ensure appropriate application of this procedure, and update as necessary;
- ✓ Provide advice to LSSD clients in respect of submitted samples to LSSD; and
- ✓ Physically control and keep record of all samples submitted to LSSD.





Procedures for Submitting a Sample

Follow the attached procedures when packaging samples for submission to the LSSD. Refer to Appendix A for a list of recommended containers and sample sizes, or refer directly to LSSD's main Web site: <http://infozone.rc.gc.ca/english/R2850120/index.htm>

Packing and shipping non-hazardous products:

- 1) Ship non-hazardous samples, such as textiles, paper, plastics, foodstuffs, etc., by regular post or by the most convenient/economical means;
- 2) Fill containers of liquids only approximately three-quarters full in order to prevent leaks from expansion of the liquid due to heat, pressure or humidity change;
- 3) Enclose seized, contraband and investigations samples in sealed sample evidence bags (R635 or R636 bags) and ship by registered mail or priority post;
- 4) Tighten all screw-top containers and tape the cap-to-bottle junction with vinyl electrician's tape to prevent mechanical loosening of the cap during transit;
- 5) Check cans to ensure lids are secure, and employ snap retainer clips to prevent lids from coming loose;
- 6) The LSSD discourages the use of glass containers because of the risk of breakage. If samples are submitted in glass containers, wrap the bottles securely with tape to prevent breakage, then wrap the containers individually with bubble wrap and pack the containers in a box with additional shock absorbent material such as styrofoam chips to minimize the chance of breakage. Mark the box as "containing glass";
- 7) Choose boxes of good quality for shipping such that they will withstand the normal abrasion of transportation without damage to the contents;
- 8) Pack the boxes so that all samples are securely held in an upright position by inert packing material. Indicate the "TOP" of the box on the outside; and
- 9) Pack all perishable foodstuffs, frozen goods, etc., in ice, dry ice or with ice packs in a chill chest then ship by courier air service with instructions for proper storage in the event of non-delivery.

Packing and shipping hazardous products:

- 1) Postal regulations prohibit the use of postal facilities for transport of hazardous chemical samples therefore, a courier **must** be used to ship hazardous chemical samples. Use a Government Bill of Lading for this purpose. (See the LSSD's Web site for a sample of a Government Bill of Lading (GC 47E));
<http://infozone.rc.gc.ca/english/R2850120/other/download.htm>





- 2) The importer/broker **must** ship hazardous products such as flammable, corrosive, toxic, radioactive materials **directly** to the LSSD accompanied by material safety data sheets and hazard or special handling information);
- 3) Pack boxes so as to prevent the release of the contents beyond any outer packaging during transport. The combined weight of the box and contents shall not exceed 10 kg; and
- 4) Mark the outer packaging with the name and address of the consignor and consignee and the words "test samples".

Procedures for Submission of Samples for Analysis

The border services officer must:

- 1) Complete a Y15 form entitled, Request to Laboratory and Scientific Services Directorate and send with the sample(s) to LSSD for analysis. (See LSSD's Web site for downloadable forms and a sample of a Y15 form. <http://infozone.rc.gc.ca/english/R2850120/other/download.htm>.) In cases where the entity submitting the samples is not the CBSA client, e.g., as is the case for denatured alcohol samples, or samples sent directly by the importer/broker or manufacturer, the CBSA client must send the appropriate form to the Laboratory;
- 2) When using a courier service, place the Y15 form in an envelope, then fasten the Y15 to the exterior of the packages;
- 3) Do not place the Y15, Y15A or Y15B form inside a package containing samples as leakage does occasionally occur;
- 4) When the importer/broker sends hazardous chemical samples directly to LSSD, the client must forward the Y15 form simultaneously by mail or by fax to LSSD. The importer/broker must attach a letter in an envelope to the exterior of the package containing the sample. The letter must contain the exact name of the sample, the name, address and phone number of the CBSA client who requested the sample, and the regional reference number;
- 5) Include all available background information including product literature, technical or classification claims, Canada Customs invoice (copy), Material Safety Data Sheets and reference to previous similar or related samples with the Y15 form or other suitable documentation. If the importer/broker is shipping the sample directly to LSSD, ask them to include the product literature and Material Safety Data Sheets for each sample;
- 6) The border services officer who submits the sample is responsible for ensuring that it is representative of the goods under review. There are instances when samples (over a period of time) degrade, polymerize, react, volatilize, etc. If apparent, this fact will be noted in LSSD's report, otherwise, Laboratory Reports will reflect the condition of the samples at the time of analysis. Please take into consideration that the sample container can have a significant effect on the condition of the sample received by LSSD;





- 7) Information on sample size requirements and recommended containers can be found in Appendix A. Convey this information to principal brokers, importers, and licensed users to ensure proper sampling; and
- 8) The sample sizes specified in these guidelines are desirable quantities. In most cases analyses are possible with somewhat smaller samples; however, the accuracy and LSSD's ability to defend the analytical results in court may be compromised.

Receipt of Samples by the LSSD

- 1) For CBSA and for excise duty samples, the Laboratory will match the sample to the Y15, Y15A or Y15B form;
- 2) A laboratory sample number will be assigned and the sample information will be entered into the Laboratory Analysis Support System (LASS);
- 3) The analyst will perform background research and analysis, as required;
- 4) The analyst will issue a Laboratory Report;
- 5) The Laboratory will store the sample for a period of 5 years (unless return of sample is specifically requested); and
- 6) Regions can submit samples merely for destruction purposes.

Regions can obtain information from the LASS query database (described below) as to the receipt of their CBSA and excise samples, their status and their progress through the Laboratory.

Because of the confidential nature of seized goods, contraband and investigations samples, clients do not have access to these types of samples in the LASS query module. The Laboratory has implemented procedures to ensure continuity of evidence for these types of samples.

The mailing/shipping address for the laboratory is:

Canada Border Services Agency
Laboratory and Scientific Services Directorate
79 Bentley Avenue
Ottawa, Ontario
K2E 6T7





Request for Laboratory Reports

Regions can obtain information from previous Laboratory Reports from the LASS query module (described below) or by contacting LSSD by telephone, e-mail or fax.

Laboratory Reports may contain information that the producer/manufacture regards as proprietary/confidential and care must be taken not to disclose such information. Importers, brokers, manufacturers, etc., requesting a copy of a Laboratory Report are directed to make their request through the Access to Information and Privacy and Disclosure Policy Division within the CBSA.

Provision of Technical Advice

As well as providing analytical services, the LSSD can assist the officers by providing technical advice concerning the composition of commodities and the interpretation of technical literature. In addition the Laboratory can provide advice on the interpretation, application and development of legislation administered by the CBSA and other related scientific issues. LSSD also provides advice in the analysis of proposals from other countries and in the development of Canadian positions related to the Harmonized System.

Videoconferencing Services

LSSD and each of the regions now have access to video conferencing. It is a versatile technology that allows us to communicate, share information and display samples quickly and effectively. Used wisely, it will help to reduce travel expenses and save valuable time. Chemists at LSSD have already used the equipment to testify in court, to conduct training and to discuss samples and documents with clients.

Video conferencing is a useful tool, especially when samples are sent to the Lab directly from the importer and our clients have not had a chance to see them first hand. Although we anticipate a growing use of this equipment to provide technical seminars, there are many other possible uses of this new technology, e.g., joint consultations between HQ policy officers, chemists and regional officers. We are currently seeking suggestions to explore the use of the new equipment.





Appendix A

CONTAINERS AND SAMPLE SIZES

Goods	Recommended Sample Size	Recommended Containers
1. General Samples		
(a) Solids, including powders, chunks, flakes, chips, hygroscopic materials, etc. Powders submitted in bags or envelopes create dust problems - hence powders should be submitted in plastic bottles or metal cans.	85 ml	125 ml wide-mouth polyethylene bottle with polypropylene screw cap
(b) Small articles, such as rings, jewelry, and sample fragments. Sample fragments being submitted for analysis, such as pieces of articles, tubes, cups, dishes, bricks and tiles, should include any markings, trade name, number of Karats, steel grade, etc., either on the fragment or documented on form Y 15.	-----	Zip-lock bag
(c) Aqueous liquids and pastes, gels, emulsions or dispersions in water (See note under item (d) below).	170 ml	250 ml wide-mouth polyethylene bottle with polypropylene screw cap





Goods	Recommended Sample Size	Recommended Containers
(d) Liquids, pastes, and gels containing organic solvent. Containers of liquids should be only approximately 3/4 full to allow for expansion. Glass containers are not recommended due to the high risk of breakage leading to contamination, loss of samples and potential health/safety problems for anyone handling the sample. Styrofoam cups and baby food jars are unsatisfactory for liquid samples since they frequently result in leakage and loss of volatile components.	170 ml	250 ml metal can with snap retainer clips to secure the lid (plastic bottles are inappropriate)
2. Plastics and Rubbers		
Rubber or plastic latexes and emulsions; adhesives	200 ml	Plastic (Nalgene) leak-proof container(s) of suitable size
Crude rubber (solid)	50 g	Solid chunk - in plastic bag or wrapped in plastic film in box or large envelope Granules - in plastic bag
3. Paints and Varnishes	200 ml	Plastic leak-proof container(s) of suitable size
4. Paper Samples This is sufficient sample for all of the following tests, if required: <ul style="list-style-type: none">▪ Groundwood pulp content▪ Mullen burst index▪ Tensile (dry, both directions) including stretch▪ Tear▪ MT Crush resistance	5 sheets, each 50 x 60 cm	Envelope - no tape or writing on the sample
5. Textile Samples		
Composition	30 x 30 cm	
Textile yarns requiring determination of:		
<ul style="list-style-type: none">▪ decitex	1000 m	Sample on original cone - the yarn must not be rewound to a new spool or cone
<ul style="list-style-type: none">▪ twist	50 m	As above
Textile fabrics requiring:		





Goods	Recommended Sample Size	Recommended Containers
▪ Weight per unit area (wt/m ²)	60 x 60 cm	Envelope - no tape on sample
▪ yarn count (dtex)	1 m x 1 m	Envelope - no tape on sample
▪ air permeability	1 m x 1 m	Envelope - no tape on sample
Textile with adhesive on one or both sides:		
▪ less than 15 mm in width	1 m	Envelope - sample on original roll or wound on any form (but not stuck to paper)
▪ other	30 cm	As above
Coated textile fabrics, nonwovens or felts for determination of water vapour permeability	30 x 30 cm	Envelope - no staple marks, punctures or adhesives from tapes
Coated textile fabrics requiring determination of per cent coating	30 x 30 cm	Envelope - no tape on sample
Shop towels entered under tariff item 6307.10.10	2-3 towels randomly selected from each bale	Envelope - no tape on sample
Canvas shoes requiring weight per square metre of the upper	1 shoe	Box or envelope. Do not place an adhesive label on the upper.
6. Other Samples		
Sugars in solid form (Chapter 17)	Fully packed in the container	250 ml wide-mouth (transparent)
Sugars in liquid form (syrops, molasses, etc.)	750 ml	1 litre metal or pry cap with clips
Chocolate (Chapter 18)	200 g	Box or zip-lock bag
Fusel oils, denatured ethyl alcohol	125 ml	150 ml narrow-mouth polyethylene bottle with leak proof polypropylene cap
Denaturants (liquid)	125 ml	150 ml narrow-mouth polyethylene bottle with leak proof polypropylene cap
Denaturants (solid)	25 g	125 ml wide-mouth polyethylene bottle with polypropylene screw cap
Spirits, wine and beer	Full unopened bottle or 250 ml if in bulk	500 ml narrow-mouth polyethylene bottle with leak proof polypropylene cap
Tobacco products	200 g	Zip-lock bag





Goods	Recommended Sample Size	Recommended Containers
Essences, perfumes, flavourings (Chapter 33)	Full unopened bottle or 25-50 ml	100 ml narrow-mouth glass bottle with leak proof cap
Photosensitive or electroconductive papers, films and plates (Chapter 37)	45 cm x 45 cm	Original package, light-proof envelope or wrapped in black paper. Sample must not have been exposed to light.
Leather samples (Chapter 41)	30 cm x 30 cm	Envelope
Ceramic tableware requiring tests for translucency, whiteness and water absorption (Chapter 69)	Unbroken plates, cups, mugs, etc.	Box with interior packing
Glassware requiring determination of linear coefficient of expansion (Chapter 70)	Two unbroken samples	Box with interior packing
Metal wires and powders (Section XV)	100 g	Metal can (powders) or envelope (wires)
Wood moulding, flooring	30 cm in length	Box
Veneer sheets, particle board, fiberboard, plywood and laminated wood	30 cm X 30 cm	Box

