HEALTH CANADA

Program: Importation of Controlled Substances and Precursors

LIVINGSTON
Simplify Trade

PGA: Health Canada

Program: Importation of Controlled Substances and Precursors

Implementation of the CBSA Single Window Initiative (SWI)

The Canada Border Services Agency (CBSA) assists Health Canada in administering the following legislation at the border:

- Canada Consumer Product Safety Act
- Controlled Drugs and Substances Act
- Food and Drugs Act
- Hazardous Products Act
- Radiation Emitting Devices Act
- Pest Control Products Act

These activities apply to all controlled drugs and substances regulated under the Controlled Drugs and Substances Act. Previously permits for a Class A precursor(s) must have been surrendered to a CBSA officer at the point of entry or exit. Under SWI this will no longer be necessary and the shipments will be able to be processed EDI providing all the information required is provided.

Under the Single Window Initiative, release requests will be submitted utilizing a new Integrated Import Declaration (IID) that allows for custom brokers to submit and obtain electronic release for goods also regulated by participating departments and agencies.

Release requests for the Importation of Controlled Substances and Precursors may be provided to the CBSA electronically by submitting an IID. The IID must include the following information:

a. LPCO Type/Authorization Type
b. LPCO Number
c. Intended Use
d. Brand Name
e. Product Category
f. Producer/Manufacturer Name and Address
g. Active Ingredient

Controlled substances or precursors may only be imported/exported into Canada by a licensed dealer, licensed producer or registered dealer and each shipment must be accompanied by a valid import or export permit. All permits carry an issuance and expiry date and are only valid for a onetime specific shipment of a controlled substance or precursor. Requirements for commercial importation or exportation are listed in **Appendix B of CBSA D-Memorandum 19-9-2**.

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Note: The information required under the SWI does not add any additional requirements, which currently exist to the import process.

Harmonized System (HS) Codes

List of HS codes applicable to goods/substances that may be regulated by Health Canada
https://www.cbsa-asfc.gc.ca/prog/sw-gu/regcom-marreg/hc-sc-eng.html.

Data Element Rationales

The following data element rationales provide additional information of the specific data element requirements required under the Single Window Initiative.

Importer Contact Name	PGAs to contact the importer for IID clarification
Importer Contact Telephone Number	PGAs to contact the importer for IID clarification
Importer Contact Email Address	PGAs to contact the importer for IID clarification
LPCO Type/Authorization Type	Importer must ensure that the product meets the appropriate licensing type to be imported.
LPCO Number	Importer must ensure that the product has a valid licensing number demonstrating its authorization for sale/use in Canada as applicable (DIN, No Objection Letter, etc.)
File	This is optional, but providing an image may facilitate communication in case of a referral.
Intended Use	The Intended Use, declared by the broker/importer, will impact the LPCO Type and LPCO Reference Number
Brand Name	Enables OCS to accurately identify products in order to validate permit status and make a decision on goods admissibility.
Batch/Lot Number	Batch/Lot number is required to be on the product label. This information will allow for timely recall postings by having knowledge of the batches/lots imported into Canada.
Product Category	The Canadian Product Category, declared by the broker/importer, will impact the LPCO Type and LPCO Reference Number required.
Producer/Manufacturer Name and Address	Producer/Manufacturer Name and Address required as it will improve communication in case of a referral.
Active Ingredient	PGA needs to be informed of the ingredient being imported.
Ingredient Quantity	Conditional. Details regarding the chemical identity of the ingredient are required.
Ingredient Quality	Conditional. This field is needed only if the concentration is less than 100%.

Intended use and Program conditions for Controlled Substances and Precursors:

Intended use	**Description**
HC01, HC02, HC10	HC01 – Generic – Human Therapeutic Use HC02 – Generic – Special Access HC10 – Generic – Veterinary Therapeutic Use
HC05, HC15, HC28	HC05 – Generic – Human Clinical Trial Use HC15 – Office of Controlled Substances – Research or Scientific use HC28 – Office of Controlled Substances – Resale

HC01, HC05, HC10, HC13, HC15, HC19, HC20, HC28	HC01 – Generic – Human Therapeutic Use HC05 – Generic – Human Clinical Trial Use HC10 – Generic – Veterinary Therapeutic Use HC13 – Generic – Manufacturing or Industrial Use HC15 – Office of Controlled Substances – Research or Scientific use HC19 – Office of Controlled Substances – Human Consumption (food use) HC20 – Office of Controlled Substances – Substances in a Final Product HC28 – Office of Controlled Substances – Resale
HC15, HC16, HC17, HC18, HC19, HC28	HC15 – Office of Controlled Substances – Research or Scientific use HC16 – Office of Controlled Substances – Agricultural Use HC17 – Office of Controlled Substances – Processing HC18 – Office of Controlled Substances – Non-viable seed/grain HC19 – Office of Controlled Substances – Human Consumption (food use) HC28 – Office of Controlled Substances – Resale
HC01, HC5, HC15, HC28	HC01 – Generic – Human Therapeutic Use HC05 – Generic – Human Clinical Trial Use HC15 – Office of Controlled Substances – Research or Scientific use HC28 – Office of Controlled Substances – Resale

Electronic Commerce Client Requirements Document (ECCRD)

The following table provides the specific rules and conditions associated to each of the data elements for HC Declarations. The data elements are: Mandatory (M), Conditional (C) or Optional (O).

Data element name	PGA element definition	Data element status	Data element rules and conditions
Importer Identification	Importer Contact Name	M	For Health Canada, an importer contact name must be provided for this declaration.
Contact Method	Importer Contact Telephone Number	C	For Health Canada, either an importer contact telephone number or importer contact e-mail address must be provided.
Contact Method	Importer Contact Email Address	C	For Health Canada, either an importer contact telephone number or importer contact e-mail address must be provided.
Document Type (Licence, Permit, Certificate, Other)	LPCO Type/ Authorization Type	C	The coded identifier of applicable document types being provided at the declaration level must be provided in this field. Document types provided here must be applicable to all commodities on this declaration. If not applicable to all commodities, please provide the document types at the commodity line level (SG121). Required document types depend on the Intended Use (SG117 APP) and Canadian Product Category (SG117 PGI). Refer to Appendix A for Intended Uses and Canadian Product categories.
Document Reference Number	LPCO Number	C	For every permit, certificate or document provided at the declaration level, an associated reference number related to that document must be provided. Refer to Appendix B for document types and associated reference numbers.

Document Source Description	File	O	For each document referenced at the declaration level, it is strongly recommended to provide an image of the document that can be accessed by qualified CBSA and Health Canada employees. Providing an image may facilitate communication in case of a referral.
Intended End Use	Intended Use	M	Provide the appropriate intended use to which the goods on this commodity line belong from one of the following: • Human Therapeutic Use • Human Clinical Trial Use • Research or Scientific Use • Special Access • Veterinary Therapeutic Use • Agricultural Use • Processing • Non-viable seed/grain • Human Consumption (food use) • Manufacturing or Industrial Use • Substances in a final product • Resale Depending on the intended use and product category (SG117 PGI), additional details and/or documentation may be required. Please refer to the tables under SG9 and SG121 for details on additional requirements.
Commodity Characteristic (Brand Name)	Brand Name	O	It is strongly recommended to provide the brand name of the commodity being imported as this may help to facilitate communication in the case of a referral.
Commodity Lot Number	Batch/ Lot Number	O	It is strongly recommended to provide the batch and/or lot number that the manufacturer/producer/grower assigned to the product as this will expedite communications in case of a referral.
Product Category	Product Category	C	Provide the appropriate product category to which the goods on this commodity line belong from one of the following: • Medical Marihuana • Narcotic • Controlled Drug • Restricted Drug • Benzodiazepine • Industrial Hemp, Seed/Grain • Class A Precursor • Class B Precursor Depending on the intended use (SG117 APP) and product category, additional details and/or documentation may be required. Please refer to the tables under SG9 and SG121 for details on additional requirements. The qualifier in field 5389 should be the code for **HC – Office of Controlled Substances**

Manufacturer Name and Address	Producer/ Manufacturer/ Name and Address	C	Details for the producer (grower/harvester) or manufacturer must be provided at the commodity line level if different than the producer (grower /harvester) or manufacturer provided in SG102. Refer to Appendix C for Mandatory producer/manufacturer details.
Document Type (Licence, Permit, Certificate, Other)	LPCO Type/ Authorization Type	C	The coded identifier of applicable document types being provided at the commodity line level must be provided in this field. If applicable to all commodities, please provide the documents at the declaration level (SG9). Acceptable documents types depend on the Intended Use (SG117 APP) and Canadian Product Category (SG117 PGI) provided. Refer to Appendix A for Intended Uses and Canadian Product categories.
Document Reference Number	LCPO Number	C	For every document type provided at the commodity line level, an associated reference number related to that document must be provided. Refer to Appendix B for document types and associated reference numbers.
Document Source Description	File	O	For each document referenced at the commodity line level, it is strongly recommended to provide an image of the document that can be accessed by qualified CBSA and Health Canada employees. Providing an image may facilitate communication in case of a referral.
Component / Ingredient Details	Active Ingredient	C	For commodities that contain ingredients regulated as controlled substances, details of the chemical identity of the ingredients must be provided. An occurrence of this segment must be provided for each ingredient that is regulated as a controlled substance, and each ingredient must be flagged as Active (COD. 7505). Field 7506 must contain a detailed free-text description of the ingredient sufficient to identify the component for compliance purposes.
Component / Ingredient Details (Quantity)	Ingredient Quantity	C	The quantity of each ingredient identified in SG128 must be provided, including the unit of measure (in field 6411).
Component / Ingredient Details (Quality)	Ingredient Quality	C	If applicable, the quality (percentage of concentration) of each ingredient identified in SG128 must be provided. If this segment is not provided, the assumption will be that the concentration is 100% for this ingredient.

Additional resources

Regulated Commodities:

Reference Code Tables

Legislative References:

The Controlled Drugs and Substances Act and relevant regulations

Customs Memoranda:

The Administration of Health Canada Acts and Regulations Relating to Certain Controlled, Prohibited or Regulated Goods.

Memorandum D19-9-1

Importation and Exportation of Controlled Substances and Precursors.

Memorandum D19-9-2

Appendix A: Intended Uses and Canadian Product categories

Intended Use	Canadian Product Category	Document Type(s)
Human Therapeutic Use	• Medical Marihuana • Narcotic • Controlled Drug • Benzodiazepine • Class A Precursor • Class B Precursor	• Import permit AND either CDSA or Producer license • Import permit AND CDSA License • Import permit AND CDSA License • Import permit AND CDSA License • Import permit AND Class A Precursor License • No documents required
Human Clinical Trial Use	• Medical Marihuana • Narcotic • Controlled Drug • Benzodiazepine • Restricted Drug • Class A Precursor • Class B Precursor	• Import permit AND CDSA License • Import permit AND CDSA License • Import permit AND CDSA License • Import permit AND CDSA License • Import permit AND CDSA License • Import permit AND Class A Precursor License • Class B Precursor Registration
Research or Scientific Use	• Medical Marihuana • Narcotic • Controlled Drug • Benzodiazepine • Restricted Drug • Industrial Hemp Seed/ Grain • Class A Precursor • Class B Precursor	• Import Permit AND CDSA License • [Import Permit AND CDSA License] Or Test Kit Registration • [Import Permit AND CDSA License] Or Test Kit Registration • [Import Permit AND CDSA License] Or Test Kit Registration • [Import Permit AND CDSA License] Or Test Kit Registration • Import Permit AND Research License • Import Permit AND Class A Precursor License OR Precursor Authorization Certificate • Class B Precursor Registration OR Precursor Authorization Certificate
Special Access	• Narcotic • Controlled Drug • Benzodiazepine	• Import permit AND CDSA License • Import permit AND CDSA License • Import permit AND CDSA License
Veterinary Therapeutic Use	• Narcotic • Controlled Drug • Benzodiazepine • Class A Precursor	• Import permit AND CDSA License • Import permit AND CDSA License • Import permit AND CDSA License • Import permit AND Class A Precursor License
Agricultural Use	• Industrial Hemp Seed/ Grain	• Import Permit AND Industrial hemp License
Processing	• Industrial Hemp Seed/ Grain	• Import Permit AND Industrial hemp License

Non-viable seed/grain	• Industrial Hemp Seed/ Grain	• Certificate of Analysis (optional)
Human Consumption (Food Use)	• Industrial Hemp Seed/ Grain • Class A Precursor	• Certificate of Analysis • Import permit AND Class A Precursor License
Manufacturing or Industrial Use	• Class A Precursor • Class B Precursor	• Import permit AND Class A Precursor License • Class B Precursor Registration
Substance in a Final Product	• Class A Precursor	• Import permit AND Class A Precursor License
Resale	• Medical Marihuana • Narcotic • Controlled Drug • Benzodiazepine • Restricted Drug • Industrial Hemp Seed/ Grain • Class A Precursor • Class B Precursor	• Import permit AND either CDSA or Producer license • Import permit AND CDSA License • Import permit AND CDSA License • Import permit AND CDSA License • Import permit AND CDSA License • Import Permit AND Industrial hemp License • Import permit AND Class A Precursor License • Class B Precursor Registration

Appendix B: Document types and associated reference numbers

Document Type(s)	Reference Number
Import Permit	Permit Number
Marihuana for Medical Purposes Regulations Producer License	License number
Controlled Drug and Substance Act License	License Number
Test Kit Registration	Test Kit Registration Number
Industrial Hemp License	License Number
Research License	License Number
Class A Precursor License	License Number
Precursor Authorization Certificate	Certificate Number
Class B Precursor Registration	Registration Number (if available) OR provide generic LPCO Number ‘XXX”

Appendix C: Mandatory producer/manufacturer details			
Field	**Location**	**Format**	**Description**
Name	C080.3036.4	an..70	Business/personal name
Street	C059.3042.5	an..35	Up to 3 lines
City	3164.6	an..35	
Country Subdivision (e.g., state)	C819.3229.9	an..6	State or foreign country political subdivision (e.g., “county” for UK)
Postal Id	3251.8	an..9	Postcodes / ZIP
Country	3207.9	an2	2 character ISO 3166 code

Contact Livingston

Have questions or need help with your SWI imports?
Contact your Livingston client services representative.
Write to us at: **clientserviceCanada@livingstonintl.com** or give us a call at **1-855-225-5544**.