30 Dec 2024

Ref: RPNSG/RD/2024-01-0002

To: All Traders and Declaring Agents

Dear Sir/Mdm,

COMMON MISTAKES AND GUIDELINES ON THE PERMIT APPLICATION FOR THE IMPORT/EXPORT OF IRRADIATING APPARATUS AND RADIOACTIVE MATERIALS

The National Environment Agency (NEA) has observed multiple instances of incorrect submission of information in the import/export permit applications for irradiating apparatus and radioactive materials, by traders and declaring agents through TradeNet using HS codes under RPNSG's purview.

2   This Circular serves as a reminder and guidance for Declaring Agents (DAs) to address some of the commonly made mistakes we have observed. These include inaccurate or incomplete declarations in the following

(i)   Goods Description

(ii)   CA Licence Number

(iii)   CA/SC Product Code

(iv)   CA/SC Code 1

(v)   Supporting Documents

3   Please refer to Annex A for examples of the common mistakes, and guidelines for filling up the mentioned fields correctly. Submission of a permit application with accurate information will aid us in processing the permit applications, allowing for quicker turnaround time and a seamless issuance of NEA licences.

4   Please note that this Circular also serves as a reminder to all traders and DAs to comply with the licensing requirements for the import and export of these controlled goods. Any individual found in contravention of Section 6(1)(a) and 7(1)(a) of the Radiation Protection Act 2007 is liable, upon conviction, to a fine of up to $100,000 or to imprisonment for a term not exceeding 5 years, or to both.

5   More details on matters related to import/export of irradiating apparatus and radioactive materials can be found on NEA's website (https://www.nea.gov.sg/our-services/radiation-safety/information-on-licence-to-import-or-export-irradiating-apparatus-and-radioactive-materials). If you require any clarification, please submit your query electronically via the Online Feedback Form at https://www.nea.gov.sg/corporate-functions/feedback or via the myENV mobile application.

Yours sincerely,
Regulation Division
Ionising Radiation Control Department/Non-Ionising Radiation Control Department
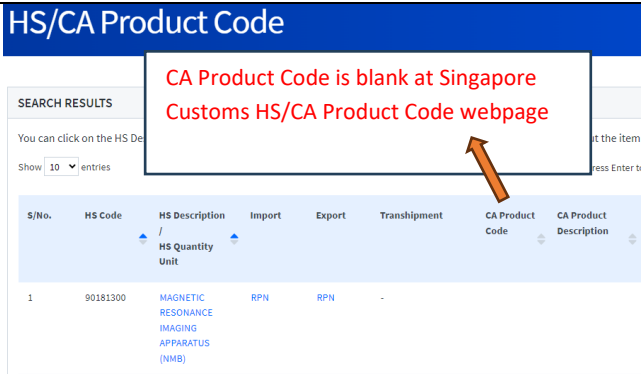Radiation Protection and Nuclear Science Group
National Environment Agency
(This is a computer-generated letter. No signature is required)

Annex A: Common Mistakes and Guidelines for Correctly Filling Out Permit Applications

TradeNet fields	Common mistakes in permit applications	Guidelines to correct common mistakes
(i) Goods Description	For **N1/IR1 licensee** (holder of approved and active licence): Default HS Code description or general item description was used at <u>Goods Description</u> field	For **N1/IR1 licensee** (holder of approved and active licence): • To provide detailed description of goods to be imported/exported o For Irradiating Apparatus: Provide <u>Brand name</u>, <u>Model</u> & <u>Serial Number</u> o For Radioactive Materials: Provide <u>Name of radionuclide</u>, <u>Radioactivity level</u> and <u>Serial Number</u> Example (Note: This is an example for illustration purpose only. It should not be copied and pasted into the permit application): 1) For Irradiating Apparatus: *Brand X, Model X, S/N 0001* 2) For Radioactive Materials: *Ir-192, 5 GBq, S/N 0001*
	For **N1/IR1/N2/IR2 licence applicant** (licence application have been submitted and pending approval): N1, IR1, N2 or IR2 Licence Application Number was not included at <u>Goods Description</u> field	For **N1/IR1/N2/IR2 licence applicant** (licence application have been submitted and pending approval): • To provide detailed description of goods to be imported/exported o N1, IR1, N2 or IR2 <u>licence application number</u> o <u>Details of goods</u> (e.g. Brand name, Model & Serial Number) as per shipping document Example (Note: This is an example for illustration purpose only. It should not be copied and pasted into the permit application): 1) For Irradiating Apparatus: *FC241234567, Brand X, Model X, S/N 0001* 2) For Radioactive Materials: *FC241234567, Ir-192, 5 GBq, S/N 0001*

TradeNet fields	Common mistakes in permit applications	Guidelines to correct common mistakes
	For **N2/IR2 licensee:** N2 or IR2 Licence Number not included at <u>Goods Description</u> field	For **N2/IR2 licensee:** Include N2 or IR2 licence number at goods description field together with goods details (e.g. Brand name, Model & Serial Number) as per shipping document. Example (Note: This is an example for illustration purpose only. It should not be copied and pasted into the permit application): *IR2/YYYY/NNNNN, N2/YYYY/NNNNN or N2/XXXXX/NNNN, Brand X, Model X, S/N 0001*
(ii) CA Licence No.	For **N1/IR1 licensee**: Licence Number not entered for valid dealer's N1 or IR1 licence entered at <u>Licence Number</u> field	For **N1/IR1 licensee**: Enter valid and correct N1 or IR1 licence number at CA Licence No. field Example (Note: This is an example for illustration purpose only. It should not be copied and pasted into the permit application): *IR1/YYYY/NNNNN, N1/YYYY/NNNNN or N1/XXXXX/NNNN* Permit application will be auto-rejected if an invalid N1 or IR1 licence number is submitted.
	For **N1/IR1 licensee**: Incorrect Licence Number entered at <u>Licence Number</u> field	
	For **N2/IR2 licensee**: N2 Licence number entered at <u>Licence Number</u> field	For **N2/IR2 licensee**: Do NOT enter N2 or IR2 licence at CA Licence No. field – *leave Licence No. field <u>blank</u>*. N2 or IR2 licence number should be declared in the Goods Description field instead).

TradeNet fields	Common mistakes in permit applications	Guidelines to correct common mistakes
	For **N1/IR1/N2/IR2 licence applicant:** Licence Application Number entered at <u>Licence Number field</u>	For **N1/IR1/N2/IR2 licence applicant:** Do not enter N1, IR1, N2 or IR2 licence application number at CA Licence No. field – *leave Licence No. field <u>blank</u>*. Licence application number should be declared in the Goods Description field instead.
(iii) CA/SC Product Code	 MISC was entered at CA Product Code for these HS Code that has blank Product Code at Singapore Customs HS/CA Product Code webpage	"MISC" Product Code should only be declared in the CA/SC Product Code field if the goods are deemed as non-controlled by RPNSG and all other relevant Competent Authorities and if there is a valid "MISC" Product Code for the HS Code in the TradeNet HS/CA Product Code Search Engine. DO NOT declare "MISC" in CA/SC Product Code field for HS Codes that do not have a valid "MISC" Product Code.
	For **N1/IR1 licensee**: Invalid or not registered Product Code	For **N1/IR1 licensee**: Enter corresponding correct Product Code that belongs to the import/export irradiating apparatus or radioactive materials as listed in a valid N1 or IR1 licence. Permit application will be auto-rejected if an invalid Product Code is declared.
	For **N1/IR1 licensee**: Product Code left "blank" for a valid dealer's N1 or IR1 licence	

TradeNet fields	Common mistakes in permit applications	Guidelines to correct common mistakes
(iv) CA/SC Code 1	CA/SC Code 1 field not provided for radioactive materials HS Codes Example: CA/SC Code 1 field left "blank" for radioactive materials HS Code	*Enter either "1", "2" or "OTHERS" in the CA/SC Code 1 field* for every radioactive source according to IAEA categorisation of the radioactive source for radioactive materials HS Codes. Please refer to Additional Licensing Information (https://www.nea.gov.sg/our-services/radiation-safety/guidelines-for-licence-application-and-annual-payment/additional-licensing-information) for more information on the categorisation to be declared in the CA/SC Code 1 field.
(v) Supporting Documents	For **N1/IR1/N2/IR2 licence applicant:** No Supporting document uploaded	**N1/IR1/N2/IR2 licence applicant:** Upload the relevant shipping document(s) and supporting document(s) such as technical specification/user manual for apparatus.

Note:
- N1 licence is a licence to manufacture or deal with non-ionising irradiating apparatus.
- IR1 licence is a licence to manufacture, possess for sale or deal in ionising irradiating apparatus or radioactive materials.
- N2 licence is a licence to keep or possess for use a non-ionising irradiating apparatus.
- IR2 licence is a licence to keep, possess for use (other than sale), or use ionising irradiating apparatus or radioactive materials.
- For your import/export permit applications, please use the Product Codes listed in RPNSG's N1 or IR1 licence only.
- "MISC" Product Code listed in TradeNet HS/CA Product Code Search Engine and are only to be declared for non-controlled goods, i.e. goods are confirmed NOT controlled by RPNSG and all other relevant Competent Authorities.