



# Process Overview

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## Purpose

This document provides an overview of the processes and service delivery for clients who wish to pursue an Alternative Safety Approach. For more information and current updates, please refer to the Technical Safety BC website at: [www.technicalsaftybc.ca](http://www.technicalsaftybc.ca).

The Alternative Safety Approaches program manages the approval and oversight of Alternative Safety Approaches (ASAs) and can be contacted by calling 1 866 566 7233 or by emailing [asa@technicalsaftybc.ca](mailto:asa@technicalsaftybc.ca).

## What is an Alternative Safety Approach?

An alternative safety approach (ASA) is an innovative way of achieving safety that is acceptable under the [Safety Standards Act](#) (SSA). It is an approach that gives owners and operators of regulated equipment flexibility in managing safety. ASAs enable innovations in technology and work practices within a structured and controlled regulatory environment.

ASA agreements provide an alternative to existing regulations, codes or standards, when a safety management system or plan is proposed detailing alternative methods to achieving an equivalent or superior level of safety. Such plans or systems are then used as the framework for regulatory assessment and compliance. Unlike all other regulations within the SSA, the adoption of an ASA is optional.

## Types of Alternative Safety Approaches

There are two types of ASAs established under the [Alternative Safety Approaches regulation](#):

1. Equivalent Standard Approach
2. Safety Management Plan

Equivalent Standard Approaches (ESA) are utilized to replace one or more regulatory requirements with a direct equivalent alternative (e.g.: there is a comparable safety approach which replaces each regulatory requirement). ESAs are typically only appropriate for less complex regulatory requirements and are generally not used to establish alternatives for:

- Permitting requirements
- Qualification requirements
- Licensing requirements

Safety Management Plans (SMP) are utilized for more complex or multi technology needs where a detailed safety management system is required to address the safety objectives of the original regulatory requirements. SMPs may be appropriate for more complex regulatory requirements where more than one safety purpose is served by a single requirement (e.g.: permitting requirements). SMPs can also be used in unique situations where the legislation does not address safety regarding the use of a particular product or undertaking of work. An example of this could be where new technology emerges that is not currently addressed by an adopted code or standard.

		Equivalent Standard Approach	Safety Management Plan
<b>Characteristics</b>	Applies to regulated product or regulated work	✓	✓
	May be used for multiple technologies		✓
	May be used for multiple sites	✓	✓
	May replace a BC adopted code, standard or regulation, with a recognized and/or generally accepted standard	✓	✓
	May replace a BC adopted code, standard or regulation, with a management plan		✓
	May be used to address an area in which the codes or regulations are silent (e.g.: new technology)		✓
	May be approved by a Local Safety Manager	✓	✓
	May be approved by a Provincial Safety Manager only		✓
	Requires oversight using activities such as monitoring, inspections, audits, and investigations	✓	✓
	Requires a formal hazard assessment		✓
	Evaluation of proposal will be performed by Technical Safety BC	✓	✓
	Evaluation of proposal may be required to be performed by a Third Party		✓
	May be used to replace permitting, licensing or certification requirements		✓
	May be used to address any requirement of a regulation under the Safety Standards Act		✓

These options apply in different situations based on a client's needs; however, the application process and Technical Safety BC's service delivery for each varies little, except in scale.

## Application and Submission Process

The ASA application process consists of two parts:

1. An initial application (using [Alternative Safety Approaches Application Form 1356](#)) outlining either:
  - a. the sections of regulation for which exemption is sought and a brief description of the alternative approach to safety; or
  - b. a detailed description of the outcome sought, including a description of the intended alternative approach to safety.

Once received, a consultation meeting may also be arranged to discuss the scope of the application in more detail. This consultation allows Technical Safety BC to provide guidance and a higher degree of certainty that the proposal is suitable for an ASA. Where the initial application does not include a list of the specific sections of regulation for which exemption is being sought, a consultation will typically be required to refine the application before it is assessed.

Following an assessment of the application, the applicant will be notified of one of the following

outcomes:

- the applicant may submit a proposal;
  - further information is required; or
  - the application is not suitable for a proposal.
2. Once the initial application has been approved, the client can submit a formal ESA or SMP proposal for assessment by a Provincial Safety Manager accompanied by the program application fee set out in the [ASA fee schedule](#). The proposal must detail how the alternative approach will achieve a level of safety at least equivalent to the safety objectives of the original regulatory requirements and must contain all additional information required for either an ESA or SMP proposal under the [Alternative Safety Approaches Regulation](#).

For more detail on the required content of an Equivalent Standard Approach or Safety Management Plan proposal please visit our [webpage](#) or contact the Alternative Safety Approaches program at: [asa@technicalssafetybc.ca](mailto:asa@technicalssafetybc.ca).

## Proposal Assessment Process

Assessment of the proposal is a structured process where Technical Safety BC examines the adequacy of the submission and determines whether the proposed alternatives provide equivalent or better safety outcomes, as implied by the objectives of the original requirements. During the evaluation process, Technical Safety BC may request additional information to support the review of the proposal or may suggest that changes be made to the proposal.

For new Alternative Safety Approaches, the evaluation process may also include meeting with the client to provide assurance that they are knowledgeable on the contents of the proposal, and can demonstrate their commitment to the approach detailed in the proposal.

On completion of the assessment process, a Notice of Determination will be provided in writing to the client detailing the outcome of this assessment. Proposals will either be:

- Accepted with or without terms and conditions, or
- Rejected

An invoice for any applicable assessment fees will be provided and the [annual oversight fee](#) for the Alternative Safety Approach will also be communicated to the client at this time.

If an Alternative Safety Approach is rejected the client will be advised in writing of the reasons for the decision.

## Registration Audit

In most cases, acceptance of a new Alternative Safety Approach will be subject to successful completion of a registration audit. A registration audit will be performed to determine the state of preparedness of the processes, procedures, policies, and other related documentation. This registration audit may include field inspection and verification to determine the condition of regulated products and/or regulated work that will be subject to the ASA.

A registration audit is billed at the hourly professional services rate set out in the [ASA fee schedule](#) and an invoice is provided at the conclusion of the audit.

## Oversight

During the term of an Alternative Safety Approach, Technical Safety BC will provide oversight using activities such as monitoring, inspections, audits, and investigations, to determine:

1. the level of compliance with the requirements, terms and conditions of the alternative safety approach
2. the extent to which the alternative safety approach is meeting the objectives of this Act and the regulations

Monitoring includes the practice of reviewing annual reports and other material requested from or submitted by the client. Each ASA client self-reports on the effectiveness of the ASA and, depending on the content of an ASA, additional reporting requirements may be included in the terms and conditions. These reports are used, in part, to determine oversight activities as well as implementation of continual improvement programs and management engagement.

Inspection activities can include physical or remote inspections of a sample of regulated equipment or regulated work. Inspection activities may occur in association with an audit, or may be a stand-alone oversight activity.

Audit activities are performed either in person or remotely and can include, but are not limited to, a review of records, continual improvement programs, training documentation, and other relevant material. The audit may also include interviews with individuals involved with the ASA.

Oversight activities and their frequencies are selected based on a number of factors including, but not limited to:

- risk categorization
- scope of ASA
- compliance history
- results of previous audits
- review of submitted reports
- duration of time since last audit
- identified issues in the Alternative Safety Approach (if applicable)

## Renewal

An Alternative Safety Approach will have a maximum term of five years and will need to be renewed *before the term expires*. At least 3 months before expiry of an ASA, a client who wishes to renew the ASA should submit the following:

- a current application form
- a new and/or updated proposal
- the required [renewal fee](#)

Prior to each renewal cycle, proposals must be reviewed in detail to determine if any changes are

required and any required revisions to the program can be submitted to Technical Safety BC for acceptance as part of the renewal process.

Renewals are assessed using the proposal assessment process described above, although the scope of the assessment may be reduced if the renewal does not involve any significant changes and there is a strong compliance history. A registration audit will not typically be required following a renewal application unless there are significant changes to the scope of the ASA or the nature of the alternatives.

## Updates, Revisions, & Cancellations

From time to time, the Alternative Safety Approach may need to be updated, revised, or cancelled.

Updates vary from revisions in that they relate to small, mostly administrative changes that may occur from time to time within an organization, whereas a revision would normally trigger the application process, to allow for suitable assessment of the revision to occur. Revisions will be billed at the hourly professional services rate set out in the [ASA fee schedule](#).

A cancellation can be initiated by the client or by Technical Safety BC. If a cancellation is initiated by Technical Safety BC, it would be a last resort when all other avenues for compliance have been exhausted, and would be done in accordance with the terms and conditions set out in the Act and Regulations. In most instances when a cancellation occurs, a transition plan demonstrating how the client will return to prescriptive regulation will need to be developed by the client and agreed to by Technical Safety BC. Proponents would be billed for costs related to transition planning assessment and oversight in accordance with the [ASA fee schedule](#).

## Fees

ASA fees consist of a combination of flat / fixed and hourly fees. The table below details when and how the various fees are applied to activities associated with the ASA program. For detailed information on the fee amounts, please see the [Alternative Services Fee Schedule](#).

	Equivalent Standard Approach	Safety Management Plan
<b>Initial application</b>	There is currently no fee for submission of an initial application to determine if a proposal may be submitted.	There is currently no fee for submission of an initial application to determine if a proposal may be submitted.
<b>Formal application (proposal submission) and Renewal</b>	Flat fee (includes up to 7 hours for assessment / evaluation of the proposal)	Flat fee (includes up to 7 hours for assessment / evaluation of the proposal)
<b>Assessment / Evaluation</b>	Hourly at professional services rate	Hourly at professional services rate
<b>Revision (Changes made during the term of the ASA)</b>	Hourly at professional services rate	Hourly at professional services rate
<b>Oversight</b>	Hourly at professional services rate (minimum 4 hours annually)	Flat fee based on the number of sites and hazard level

<b>Audits</b>	Hourly at professional services rate (time billed includes preparation, travel, completion and follow-up)	Hourly at professional services rate (time billed includes preparation, travel, completion and follow-up)
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## Revision History

Revision	Revision Date	Revision history	Revised by
00	2011-05-20	New release	Pearse Walsh
01	2013-05-30	Small changes to reflect new fee schedule	Spencer Fitschen
02	2016-12-22	General revision to reflect review of business process	Spencer Fitschen
03	2017-11-08	Branding update. Changed references from BC Safety Authority to Technical Safety BC	Laura McLeod
04	2021-04-16	General revision and update.	Liam McKearney