



ALTERNATIVE SAFETY APPROACHES PROCESS OVERVIEW

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Purpose

This document provides an overview of the processes and service delivery to proponents who wish to pursue an Alternative Safety Approach. For more information and current updates, please refer to Information Bulletin: *Primer to Alternative Safety Approaches*, and the Technical Safety BC website, www.technicalsaftybc.ca.

There are two optional Alternative Safety Approaches:

1. Equivalent Standard Approach (ESA), or
2. Safety Management Plan Approach (SMP).

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

Before a proponent submits an Alternative Safety Approaches application, it is expected that there will be discussion with Technical Safety BC, as there are other options available outside of the Alternative Safety Approaches program. The initial consultation will provide a higher degree of certainty that the proposal is suitable for an Alternative Safety Approach.

Technical Safety BC has formed a core group to manage and operate the Alternative Safety Approaches program; they can be contacted by calling 1 866 566 7233 or by emailing asa@technicalsaftybc.ca.

Preparation and Submission Process

After an initial consultation, the proponent may submit an application, which includes, but may not be limited to, a completed application form¹, any required fees, an overview of the regulations that the Alternative Safety Approach is intended to address, and a brief summary of how the proposal will meet the safety objectives of the regulations and the *Safety Standards Act*. At a high level, this is meant to provide us with information as to who you are, what you do, where the proposed ASA would apply, and what would you like to do.

Following an assessment of the application, the applicant will be notified of the outcome. This will be either that:

- the applicant may submit a proposal, or
- the application is not suitable for a proposal.

The proposal submission provides detail as to how a proponent will maintain or exceed the safety objectives of the regulations addressed in the application or, in some cases, the *Safety Standards Act*.

Full details on the required contents of an Equivalent Standard Approach or a Safety Management Plan can be found in the guidance materials² available Technical Safety BC's website, www.technicalsaftybc.ca, or by contacting us at 1 866 566 7233.

¹ Available at www.technicalsaftybc.ca as form "FRM 1356".

² Safety Management Plan Guide MAN 4032.

ASA Assessment Process

Assessment of the proposal is a structured process where Technical Safety BC examines the adequacy of the submission and determines whether the proponent has proposed alternatives to the regulations that provide equivalent or better outcomes, as implied by the objectives of the original requirements. In the cases where the proposal is not directly addressed under the Act, that provision is made for the safe use of a regulated product or the safe undertaking of regulated work.

For new Safety Management Plans, the evaluation process may also include an oral demonstration meeting with the proponent to provide assurance that they are knowledgeable on the contents of the plan, and can demonstrate their commitment to the safety management systems approach detailed in the plan.

As part of the assessment process, 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 be accompanied by field verification to determine the current condition of the regulated product and/or regulated work. The goal is the determination as to the state of readiness and suitability for the implementation of the proposed ASA.

On completion of the assessment process, a Safety Manager will make a decision on the outcome; either the Alternative Safety Approach will be accepted, accepted with terms and conditions, or rejected. This notice of determination will be provided in writing to the proponent. An invoice for all assessment fees will be provided at this time.

On completion of the assessment, the annual administration fee for the Alternative Safety Approach will be communicated to the proponent. The annual fee payment schedule will commence on the date the Alternative Safety Approach is accepted by Technical Safety BC.

If an Alternative Safety Approach is rejected the proponent will be advised in writing of the reasons for the decision and the file will be closed. If they wish to continue along an Alternative Safety Approaches path, a new application will be required.

Oversight

During the term of an Alternative Safety Approach, Technical Safety BC will provide oversight to ensure the proponent is fulfilling the commitments detailed in the submitted proposal. These include activities such as audits, investigations, research, monitoring, and compliance and enforcement actions.

Compliance audits are performed to determine the level of conformance with the ASA, at a frequency linked to:

- the residual risk (if submission is a Safety Management Plan),
- past audit history,
- results as reported as to the efficacy of the ASA,
- identified issues in the Alternative Safety Approach, or past compliance history (if applicable).

Monitoring includes the practice of reviewing annual reports from the client, as well as from the industry group within which the client operates. Each ASA client self-reports on the efficacy of the ASA. These reports are used, in part, to determine audit frequency as well as implementation of continual improvement programs and management engagement.

Audit activities can include, but are not limited to, a review of records at proponent’s site, interviews with employees, and in the case of Safety Management Plans, compliance with the continual improvement program, training documentation, and other relevant material.

Renewal

An Alternative Safety Approach will have a maximum term of five years and will need to be renewed *before the term expires*. Renewal processes will include a requirement to submit a new and/or updated version of the Alternative Safety Approach. The key or prime information selected for assessment in the renewal process would be the new information in the Alternative Safety Approach. The five year renewal process should be the time when all of the minor changes that need to be incorporated into an Alternative Safety Approach are included, to make all of the information current. The process will also provide an opportunity to make sure that the plan was working to provide the safety outcomes as required in the *Act*.

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.

A cancellation could be initiated by the proponent or by Technical Safety BC. If a cancellation is initiated by Technical Safety BC, it would be a last resort when all other avenues to conformance have been exhausted, and would be done under terms and conditions set out in the Act and Regulations. In most instances where a cancellation would occur, a transition plan would likely need to be developed by the proponent and agreed to and evaluated by Technical Safety BC. Proponents would be billed for costs related to transition planning assessment and oversight.

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