



# Safety Management Plan

## Proposal Guideline

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## A. Introduction

This guideline assists in developing, updating or revising a Safety Management Plan (SMP) proposal under the Alternative Safety Approach Regulation (ASAR).

An SMP is an alternative safety approach that provides for:

- (a) the replacement of requirements set out in a regulation made under *The Act* with an alternative approach to safety as set out in the SMP, or
- (b) if the regulations made under *The Act* do not address safety in respect of the use of a particular regulated product or the undertaking of particular regulated work, the establishment of an approach that will provide for the safe use of the regulated product or the safe undertaking of the regulated work.

The applicant must demonstrate that the plan achieves a level of safety consistent with the objectives of the *Safety Standards Act* (*The Act*) and the applicable regulations made under it and must provide information on how the applicant will ensure continual improvement of the effectiveness with which the SMP achieves the objectives of *The Act* and the regulations.

The list of alternative approaches (exemptions and alternatives) established within the SMP identifies the scope and limits of the regulated work and/or regulated product that will be the subject of the SMP. Any regulatory requirements not addressed within the SMP remain subject to the standard regulatory requirements.

The material presented here does not replace the applicable legislation. The applicant is encouraged to read the applicable sections of [The Act](#) and [ASAR](#) to enable the most comprehensive understanding of the requirements.

For more information on Alternative Safety Approach processes such as, application, assessment, oversight, renewal and fees, please see our [Process Overview Guide](#) or contact the Alternative Safety Approaches program by calling 1 866 566 7233 or by emailing [asa@technicalafetybc.ca](mailto:asa@technicalafetybc.ca).

## B. SMP proposal guideline

This document provides guidance for creating an SMP Proposal. It is not intended to provide all of the information that may need to be included, but rather to serve as a guideline for basic content and format. Depending on the complexity of the exemptions sought, additional information beyond the contents of this guideline may be required.

### 1. Cover page

The cover page should contain:

- organization name,
- logo,
- physical address,
- applicable technology (i.e. electrical, gas, boiler and pressure vessel, etc.), and
- date of issuance.

### 2. Table of contents

The table of contents should reflect the structure of the proposal by listing the sections and the exhibits.

For the purpose of clarity, define all abbreviated titles of personnel, control documents, organizations, codes, standards, Acts and Regulations used within the manual, as well as any term used frequently within the document.

### **3. Accountability framework** (ASAR s. 8 (a) & (b))

The SMP must include an accountability framework which identifies each position responsible for a component of the SMP and how the accountability of these roles relate to senior management.

Additionally, the SMP must identify both the technical and administrative authorized representatives including their contact information, role in relation to the SMP and their signatures. These individuals will act as the primary contacts, on behalf of the organization, for all matters associated with the SMP.

### **4. Contributors** (ASAR s. 7 (b) & 9 (1)(b))

The SMP must include a description of the various parties responsible for preparing and contributing to the development of the SMP. This should include, but is not limited to, workforce participation, management participation and outside contractor/consultant participation.

For contributors from outside the organization, their organization name, scope of involvement and qualifications should be included.

### **5. Safety policy** (ASAR s. 8 (c))

A description of the organization's safety policy as it relates to the regulated products, regulated work and/or premises that is the subject of the SMP must be included. This description should provide a summary of the organizational policy and include reference to specific internal policy documents containing greater detail when applicable.

### **6. Site / premises information** (ASAR s. 8(e))

Site(s)/premises are the definable location(s) that will be the subject of the SMP. The following information must be provided for each site/premises as applicable:

- **Location of the premises:** the physical location of the premises must be provided. Where the premises are distributed, area plans or some other suitable method of description will be required. Any legally recognized classification will be acceptable for the purposes of describing the location of the premises, such as a street address issued by a local governing authority, or a grid location as identified using the Petroleum and Natural Gas Grid Regulation. If a name has been assigned to a location, the name should also be included.
- **Description of the premises:** a description of the premises and its operations must be provided. This will vary greatly for individual applications, however the following are examples of what may be included:
  - The activities or primary operations at the premises
  - Numbers and locations of people typically at the premises
  - Other operations located on the same premises that may not be subject to the SMP, including a general outline of the types of activities that occur there
  - The locations of roads, railways, docks, entrances to the facility and any other feature that is relevant to the SMP
- **Description of the property surrounding the premises:** a general description of the property and environment surrounding the premises must be provided.

## 7. Exemptions and alternatives *(ASAR s. 8(d))*

The SMP must include a list of the regulatory requirements sought for exemption followed by a description of the alternative requirements, policies and/or procedures intended to be implemented in their place.

- The listing of exemptions should take the form of exact reference to the requirement in the regulation, standard, or code.
- Each exemption listed should then be followed by a description of the alternative requirements, policies and/or procedures being implemented in place of the original regulatory requirement(s). This description should be an overview of the organizational systems that have been, or will be, put in place to meet the objectives of the original regulatory requirement. Any policies, procedures or other internal documentation referenced must include the official document name, number, and (when applicable) section number(s).

This list of exemptions and alternatives identifies the scope and limits of the regulated work and/or regulated products that will be the subject of the SMP.

## 8. Safety explanation / argument *(ASAR s. 7(1)(a))*

The SMP must provide an explanation of how the plan will achieve a level of safety consistent with the objectives of the original regulatory requirement(s) being sought for exemption.

This explanation can be provided as a single argument describing how the overall plan meets or exceeds a level of safety consistent with the objectives of the original regulatory requirement(s) or can be broken down into separate arguments for each exemption sought. However this explanation is presented, it must:

1. demonstrate a clear understanding of the objectives of the original requirements and associated hazards and,
2. demonstrate how the original objectives will be met, associated hazards mitigated and ultimately a comparable, or superior, level of safety achieved.

This explanation should be convincing, provide evidence and demonstrate that it was developed in a systematic manner.

## 9. Hazard and risk control *(ASAR s. 9(1) & (2)(a))*

Once the scope of the SMP has been determined, any hazards related to the regulated product, regulated work, or premises that is the subject of the SMP, must be identified, assessed, and controlled. The amount of information required relating to hazard and risk control will be proportionate to the scope of the SMP, severity of identified hazards, and complexity of the facility, equipment or work.

### Hazard information

A hazard is a situation or intrinsic property with the potential to create harm to people, property or the environment. For significant hazards identified in association with the SMP, the following information must be presented within the plan:

- a description of the significant hazards identified
- the methods used to assess the hazards, and
- any individuals involved in the assessment.

The SMP can summarize the key findings of supporting studies and explain their significance. The full study (or assessment) can be titled and referenced with an up-to-date version maintained and made available for review upon request.

A description of the parties involved in the hazard assessment must be included in the “contributors” section.

### **Risk control information**

The SMP must also describe how the risk associated with the identified hazards will be controlled. Control measures take many forms, including design features, physical equipment, process control systems, management systems, operating and maintenance procedures, and emergency response plans, and usually follow this hierarchy of implementation to ensure safety. The following information related to risk control must be provided within the plan:

- a description of the plan for controlling the hazards, and
- the source of the plan or methodology used to create the plan.

### **Hazard category**

Once all significant hazards associated with the SMP have been identified and assessed, the applicable hazard category, as established by the provincial safety manager, can be determined. The evaluation performed as a part of the hazard assessment should produce two findings; the total number of people that could be endangered, and the total value of property that could be endangered as a result of the most consequential event resulting from unmitigated hazard(s). The hazard category for the SMP is the higher category determined from the table below.

	<b>Potential number of persons endangered</b>	<b>Potential value of property endangered</b>
<b>Category 1</b>	50 persons or less	\$10,000,000 or less
<b>Category 2</b>	51 – 250 persons	\$10,000,001 to \$50,000,000
<b>Category 3</b>	More than 250 persons	More than \$50,000,000

## **10. Management of change** (ASAR s. 9(2)(b))

The SMP must provide details on how management of change will be controlled. Due to the fact that organizations and facilities rarely remain completely static in terms of people, processes, equipment, software or material, effective management of change is a critical aspect in maintaining safe operations.

The SMP should reference the organization’s procedures for planning and controlling all changes in people, plant, processes and process variables, materials, equipment, procedures, software, design, or external circumstances which affect or may affect the use of the regulated product or the undertaking of the regulated work that is the subject of the SMP.

This section should include a description of or reference to an organizational policy on how permanent, temporary and urgent operational changes will be managed. Below are examples of items which may be appropriate to include dependent on the scope and complexity of the SMP:

- definition of what constitutes a “change” for the purposes of initiating formal procedures,
- assignment of responsibilities and authorities for initiating change,
- a description of the process/procedures to identify, document and implement changes,

- description of the process/procedures to identify and carry out analysis, where appropriate, of any safety implications of the proposed change,
- description of the process/procedures to define, explain, document, and implement safety measures deemed appropriate, including information and training requirements, as well as necessary changes to operational procedures,
- description of the process/procedures that define and describe implementation of appropriate post-change review procedures, corrective mechanisms, and subsequent monitoring, and
- a demonstration that the proposed management of change process is appropriate for the facility, including references to other parts of the SMP submission as necessary.

## **11. Training** (ASAR s. 7(1)(b))

The SMP must provide details on the training that will be provided to individuals who will be involved with the regulated product or regulated work that is the subject of the SMP.

This information should include initial and ongoing training to ensure individuals (staff and licensed contractors) keep current and up-to-date. In addition, the SMP should also identify how those who are not directly engaged in regulated work or use regulated products, but who may be exposed to identified hazards, are educated with respect to those hazards and the emergency response procedures when applicable.

## **12. Incident management and reporting** (ASAR s. 9(3))

Incident reporting is a requirement under the *Safety Standards Act* and all SMPs must provide information on the organization's procedures for:

- responding to and mitigating incidents, and
- documenting and reporting incidents to Technical Safety BC

Incidents include events that cause death, personal injury, or damage to property and events that create a risk of personal injury or damage to property (hazards).

### **Incident management**

SMP holders must detail their internal procedures, or provide reference to internal procedures, for responding to incidents that have occurred as a result of regulated work or the testing, use, or operation of a regulated product. The SMP should address emergency response items such as:

- safety of on-site personnel by providing sufficient detail to show that in the event of an emergency, people at the facility would be safe and without unreasonable risk.
- an emergency response organizational chart indicating, by title, who is responsible for implementing the emergency measures.

### **Documenting and reporting of incidents**

In accordance with *The Act*, incidents must be reported to Technical Safety BC as soon as practicable after the incident occurs. In addition to detailing how incidents will be reported to Technical Safety BC, SMP holders must also describe or provide reference to internal procedures for the investigation and documentation of incidents. The learnings gathered through this process can be used to support the continual improvement of the effectiveness of the SMP.

### 13. Continual improvement *(ASAR s. 10)*

The SMP must include details on how the continual improvement of the effectiveness with which the SMP achieves the objectives of The Act and the regulations will be managed. There are two aspects to continual improvement that must be addressed in an SMP:

- Measures designed to assure the quality of the regulated work and regulated products, including measures designed to monitor on-going compliance with any codes, standards, or best practices.
- Measures designed to ensure that the SMP itself is current (updated to include changes in the facility and key personnel), effective (it is achieving safety levels that are consistent with or exceed the objectives of The Act), and that the facility is operated and maintained as outlined in the plan.

Tools such as inspection and audit can be used to determine if the SMP is being effectively implemented. The results of these activities can be used to identify where safety can be improved. Collection of evidence and the evaluation of audit results will verify the effectiveness and promote continual improvement of the SMP.

### 14. Revision history

The SMP should include a means for tracking revision history including revision number/level, a brief description of the scope of revision, the date revised, and the individual responsible for the revision.

Revision number	Revision date	Revised by	Summary of revision
01	2011/12/07	Certificate of Insurance information moved, and various grammar changes.	Spencer Fitschen, SSO, ASA
02	2013/01/28	Major rewrite	Spencer Fitschen, SSO, ASA
03	2021-05-13	Liam McKearney	General update.

An SMP may be revised at any time during the term provided that the revisions are submitted to Technical Safety BC along with a copy of the [Alternative Safety Approach Application Form \(FRM-1356\)](#) for review and acceptance prior to implementation.