

## **Guidelines for Requesting Changes to the Alberta Safety Codes**

Suggestions for changes to the Alberta Safety Codes are welcome from anyone at any time. The following points will help guide you in preparing your submission.

### **What are the Alberta Safety Codes?**

The Alberta Safety Codes are made up of 29 separate Codes, developed by various code and standard writing organisations from across Canada and the United States. Each code or standard is reviewed for relevancy in Alberta by the appropriate technical council of the Safety Codes Council, who in turn make recommendations to the Minister of Municipal Affairs for adoption of the codes by regulation. Municipal Affairs and local municipalities are then responsible for the proper administration of each code.

### **Who Must Be Convinced**

To bring about a change in one of the Alberta Safety Codes, you must convince the appropriate technical council of the Safety Codes Council that your suggested change is needed and that it is technically correct. These technical councils are made up of volunteers from all regions of Alberta and many facets of industry. These volunteers are chosen for their expertise in the area covered by their respective technical councils.

### **Code Change Request Requirements**

#### ***Supporting Documentation***

Code Change Requests should be accompanied by enough documentation to make the case that a change is needed. This documentation can include research and testing results, statistics, case studies and so forth.

#### ***Cost/Benefit Analysis***

One important aspect to include in the documentation supporting a Code Change Request is information on the costs of implementing it and the benefits likely to be achieved. This is not to suggest that every Code Change Request must be accompanied by a detailed cost/benefit analysis; however, the technical councils must give due consideration to these questions and so they expect proponents of changes to contribute information that will assist them in this task. Where the requested change has major cost implications, the technical councils may ask that a detailed cost/benefit analysis be provided.

#### ***Enforceability***

Proponents of Code Change Requests should also bear in mind that there is little use in requesting Code provisions for which there are no practical means of enforcement. This problem can arise when requested changes are written in such language that there are no existing tools or models that can be used to evaluate whether or not a design or construction actually conforms to the provision.

A related issue is the implications of Code Change Requests for the existing code enforcement infrastructure. Enforcement agencies such as municipal departments and fire services have finite resources, so requesting changes that would call for substantial

increases in enforcement resources would require very strong justification to be favourably received by the technical councils.

Therefore, a Code Change Request should include information on enforcement implications, including available resources.

### ***Clarity***

The technical councils also expect proponents to make very clear what specific change they would like to see. Code Change Requests should identify the shortcomings of the existing requirement, and existing Code provisions that would be affected by the change. New wording should be suggested to address these shortcomings. It is recognized that not all those interested in improving the Codes can be experts in Code writing, and so Alberta Municipal Affairs staff will suggest improvements to the proposed wording, if necessary. Nevertheless, if specific wording is used, it will help to make the proponent's intentions clear. Code Change Requests that lack clarity may be returned to the proponents for clarification, thus prolonging the time required for the technical councils to deal with the requests.

### **Code Development Process**

Persons with an active interest in the contents of the Alberta Safety Codes should maintain an awareness of the various stages of the Code cycle.

### ***Submission***

Although suggestions for changes to the Alberta Safety Codes are welcome from anyone at any time, the Codes are revised and published according to a schedule and there may be a delay between the submission of a Code Change Request and its publication in the relevant Code, even after the request has passed through the technical councils and public review processes. Code Change Requests submitted immediately before or after a public review are generally deferred to the next code cycle.

### ***Provincial Review***

When a Code Change Request is received by Alberta Municipal Affairs, staff reviews it for completeness and to determine whether it meets the submission criteria. If it does not meet submission criteria, MA&H staff may contact the proponent for more information or clarification, or they may reject the Code Change Request altogether. If it meets the submission criteria, it will be forwarded to the appropriate technical council of the Safety Codes Council for review.

The first step in the review is to determine whether or not the Code Change Request pertains to an Alberta-specific requirement or to a requirement in one of the base code documents, on which the Alberta Safety Codes are based. If it is determined that the Code Change Request pertains to a requirement in one of the base code documents, the request will be returned to the proponent with instructions to direct their request to the appropriate code or standard-writing organisation identified at the end of these guidelines.

If it is determined that the request pertains to an Alberta-specific requirement, at that point it may be accepted as a request and put forward for public review as a Code Change Proposal, it may be modified prior to submission for public review, or it may be

rejected as being inappropriate or unnecessary. Regardless of the outcome, once a decision has been made, the technical council will notify proponents of the status of their Code Change Request.

### ***Public Review***

If the technical councils determine that the Code Change Request is appropriate, it will then be included as a Code Change Proposal in a public review that is held at least once every code cycle. Code users include architects, engineers, local code enforcement authorities as well as the general public. Code users are asked to comment on the feasibility, enforceability, cost effectiveness and policy implications of each Code Change Proposal. Code users are asked to verify that a proposed change establishes the minimum acceptable provision, given the risks to buildings addressed by that provision.

### ***Disposition***

At the end of the public review, the comments on each Code Change Proposal are compiled and reviewed by staff at Alberta Municipal Affairs. Based on the comments and recommendations from code users, MA&H staff will make recommendations to the appropriate technical councils as to whether or not the Code Change Proposal should be accepted, modified or rejected.

If a proposal is accepted or modified, it will then be incorporated into the next version of the appropriate Alberta Safety Code.

### **Objectives**

The Alberta Building, Fire and Plumbing Codes are objective-based codes. This means that the objectives each Code attempts to address are clearly stated and every provision in the Code is there to help achieve at least one of the stated objectives. It follows that an objective-based code will only contain provisions that are related to achieving one of its stated objectives.

The objectives of the Alberta Building, Fire and Plumbing Codes have been determined by the Canadian Commission of Building and Fire Codes (CCBFC) and Alberta Municipal Affairs, in consultation with the other provinces and territories. The objectives of the Alberta Building, Fire and Plumbing Codes are listed in Part 2 of Division A of each Code. Persons proposing the addition of a provision to one of the National Code Documents should ensure that the proposed addition can be linked to one of the Code's stated objectives.

The addition of a provision that cannot be linked to one of the currently stated objectives would require the addition of at least one new objective or sub-objective. Although this is not out of the question, the CCBFC, Alberta Municipal Affairs and the Safety Codes Council would consider such an expansion of the scope of the Code in question only after careful consideration and consultation.

### **Focus on Generic/Widespread Issues**

It is impractical for the Alberta Safety Codes to deal with specific products or with situations that arise only rarely. Code Change Requests should therefore be limited to generic or widespread issues. Innovative products that are not yet covered by standards or mentioned in the Codes are not necessarily excluded from use; they can

be accepted by local authorities based on the provisions in the Codes regarding alternative solutions (equivalents). Services, such as NRC's Canadian Construction Materials Centre, are available to assist authorities in evaluating such equivalence. Similarly, unique situations are best dealt with by local authorities rather than swelling the Codes with requirements that are seldom applied.

### **Summary**

Code Change Requests should be framed in such a manner as to convince a council of volunteer experts that there is a problem with certain existing requirements, an omission in those requirements or that the current requirements do not adequately reflect the state of the industry. The requests should also be accompanied by documentation to support the case being made, including information on the likely costs of implementing the requested change.

Each request should answer the following questions:

- Which one of the Alberta Safety Codes are affected by this request?
- What is the issue raised by the request?
- Which provision of the appropriate code addresses the issue?
- Which objective of the appropriate code addresses the issue?
- What is the proposed solution and how does it address the issue?
- What are the cost implications?
- What are the enforcement implications?

The Safety Codes Council has instructed the staff of Alberta Municipal Affairs to return requests that are incomplete or unclear to their proponents. The staff of Alberta Municipal Affairs is available to help proponents prepare suitable submissions, but the onus is on the proponent to satisfy these criteria.

### **Disclaimer**

The collection of personal information on this form is authorized under section 33 of the *Freedom of Information and Protection of Privacy (FOIP) Act* and will be used to support the process of evaluating proposed amendments to the Alberta Safety Codes. The personal information will be managed in accordance with the privacy provisions of the *FOIP Act*. Questions about the collection of this information can be directed to the Safety Services branch of Alberta Municipal Affairs, at the address noted above.

By submitting this Code Change Request, you grant permission for all of the information provided, including your name, company, and contact information, to be circulated to staff of Alberta Municipal Affairs and members of the Safety Codes Council on an as needed basis, including correspondence with you about the proposed amendment you are putting forward. Any personal information will be deleted prior to further promulgation of the proposed change beyond what has been detailed above.

### **Codes and Standards Contacts**

The following organizations are responsible for the development of the various Codes adopted in Alberta.

**1. Alberta Municipal Affairs**

16<sup>th</sup> Floor Commerce Place, 10155-102 St.  
Edmonton, AB T5J 4L4  
Canada

- *Alberta Building Code*, as established by the Safety Codes Council and published by the National Research Council of Canada
- *Alberta Fire Code*, as established by the Safety Codes Council and published by the National Research Council of Canada
- *Code for Electrical Installations at Oil and Gas Facilities*, published by the Safety Codes Council
- *Alberta Electrical and Communication Utility Code*, published by the Safety Codes Council
- *Alberta Private Sewage Systems Standard of Practice*, published by the Safety Codes Council

**2. Institute for Research in Construction**

National Research Council of Canada  
1200 Montreal Road  
Ottawa, ON K1A 0R6  
Canada

- *National Plumbing Code of Canada 2005*

**3. Canadian Standards Association**

5060 Spectrum Way  
Mississauga, ON L4W 5N6  
Canada

- CSA Standard Z98, "*Passenger Ropeways*"
- CSA Standard Z267, "*Safety Code for Amusement Rides and Devices*"
- CSA Standard B355, "*Lifts for Persons with Physical Disabilities*"
- CSA Standard Z185, "*Safety Code for Personnel Hoists*"
- CSA Standard B311, "*Safety Code for Manlifts*"
- CSA Standard B44, "*Safety Code for Elevators*"
- CSA Standard B51, "*Boiler, Pressure Vessel and Pressure Piping Code*"
- CSA Standard B52, "*Mechanical Refrigeration Code*"
- CSA Standard Z662, "*Oil and Gas Pipeline Systems*"
- CSA Standard B108, "*Natural Gas Fuelling Stations Installation Code*"
- CSA Standard B109, "*Natural Gas for Vehicles Installation Code*"
- CSA Standard B149.1, "*Natural Gas and Propane Installation Code*"
- CSA Standard B149.2, "*Propane Storage and Handling Code*"
- CSA Standard B149.5, "*Installation Code for Propane Fuel Systems and Tanks on Highway Vehicles*"
- CSA Standard C22.1, "*Canadian Electrical Code, Part I (20th Edition), Safety Standard for Electrical Installations*"

**4. American Society of Mechanical Engineers International**

Three Park Avenue  
New York, NY 10016-5990  
USA

- *ASME Boiler and Pressure Vessel Code*
- *ASME Code for Pressure Piping, B31*
  - *B31.1, "Power Piping", including Appendices A to G, J, II and III*
  - *B31.3, "Process Piping", including Appendices A to E, K, L and X*
  - *B31.5, "Refrigeration Piping and Heat Transfer Components"*
  - *B31.9, "Building Services Piping"*

**5. American National Standards Institute**

1819 L Street, NW, 6th floor  
Washington, DC 20036  
USA

- *ANSI Standard K61.1, "Safety Requirements for the Storage and Handling of Anhydrous Ammonia"*

**6. National Fire Protection Association**

1 Batterymarch Park  
Quincy, MA 02169-7471  
USA

- *NFPA 58, "Liquefied Petroleum Gas Code"*
- *NFPA 59, "Standard for the Storage and Handling of Liquefied Petroleum Gases at Utility Gas Plants"*

**7. Manufacturers Standardization Society**

127 Park Street NE  
Vienna, VA 22180  
USA

- *MSS Standard SP-25, "Standard Marking System for Valves, Fittings, Flanges and Unions"*

**8. Tubular Exchanger Manufacturers Association**

25 North Broadway  
Tarrytown, NY 10591  
USA

- *Standards of Tubular Exchanger Manufacturers Association*

**9. American Petroleum Institute**

1220 L Street, NW  
Washington, DC 20005-4070  
USA

- *API Standard 661, "Air Cooled Heat Exchangers for General Refinery Services"*

# ALBERTA SAFETY CODES CODE CHANGE REQUEST FORM

**For staff use only**

Date Received: \_\_\_\_\_  
 Assigned to: \_\_\_\_\_  
 File No.: \_\_\_\_\_  
 PCF No.: \_\_\_\_\_

**Note:** Use one form per code change proposal - duplicate form as necessary - print single sided.  
 Refer to the attached guidelines for information and guidance on how to properly complete this form.  
 Complete these forms in their entirety. Incomplete forms may be returned to the proponent or rejected.

Mail, fax or email to:  
**Alberta Municipal Affairs, Safety Services**  
 16th floor, Commerce Place  
 10155-102 Street, Edmonton, Alberta T5J 4L4  
 Telephone 1-866-421-6929 Fax 780/427-8686  
 Email: safety.services@gov.ab.ca

The collection of personal information on this form is authorized under section 33 of the *Freedom of Information and Protection of Privacy (FOIP) Act* and will be used to support the process of evaluating proposed amendments to the Alberta Safety Codes. The personal information will be managed in accordance with the privacy provisions of the *FOIP Act*. Questions about the collection of this information can be directed to the Safety Services branch of Alberta Municipal Affairs, at the address noted above.

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Name:	
Address:	
Phone: (     )	Fax: (     )
Email Address:	
Contact me by: <input type="checkbox"/> E-mail <input type="checkbox"/> Fax <input type="checkbox"/> Mail	
Function:	<input type="checkbox"/> Code Enforcement Official <input type="checkbox"/> Builder / Contractor <input type="checkbox"/> Architect / Engineer / Designer <input type="checkbox"/> Supplier / Manufacturer <input type="checkbox"/> Building Owners / Managers <input type="checkbox"/> Home Owner / General Public <input type="checkbox"/> Other (please specify)

**Code Document:** Which of the Alberta Safety Codes are you proposing to change?

**Code Reference:** What is it being proposed to change (article, sentence, etc.)?

**Problem:** Why should the existing provision be changed or, if proposing an addition to the code, what is missing and which code objective does it address?

**Proposed Change/Addition:** What wording for the change/addition do you think should be used in the Code?

**Justification/Explanation:** How does the proposed change/addition address the problem?

**Cost Implications:** Will the change/addition entail any added costs? Will it provide benefits measurable in monetary terms? Provide detailed cost-benefit analysis where applicable.

**Enforcement Implications:** Can the proposed change/addition be enforced by the infrastructure available to enforce this code? Will enforcement require and increase in resources?

**Other Comments:**

**List Attached Supporting Material:**