

Annual Review of TTC's Safety, Health & Environment (SH&E) Management System

Date: June 23, 2022 **To:** TTC Board

Summary

At its meeting on June 9, 2022, the TTC Audit and Risk Management Committee considered a report entitled Annual Review of TTC's Safety, Health & Environment (SH&E) Management System and received a staff presentation on the item.

The staff presentation can be viewed online:

Q4 2020 to Q3 2021 SH&E Management System Review

The subject report is forwarded to the TTC Board for information.

Contact

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Attachments

Attachment 1 – Annual Review of TTC's Safety, Health & Environment (SH&E) Management System



Annual Review of TTC's Safety, Health & Environment (SH&E) Management System

Date: June 9, 2022

To: Audit and Risk Management Committee

From: Chief Safety Officer (Acting)

Summary

The TTC continues to manage and mitigate occupational health and safety, operational safety as well as environmental risks due to its operations, activities and services in a systematic manner through the implementation and maintenance of its Safety, Health & Environment (SH&E) Management System.

A SH&E Management System is a comprehensive and proactive approach to managing SH&E risk. The system goes beyond a simple sum of individual or isolated safety and environmental management programs and activities, such as investigation, inspection or training. It is designed to improve SH&E performance and reduce risk by integrating all its processes into a continuous improvement cycle of Plan-Do-Check-Act.

A review of the TTC's SH&E Management System is conducted by the TTC's internal Safety, Security and Environment Executive (SX) Committee on an annual basis. The purpose of the annual review is to evaluate the suitability, adequacy and effectiveness of the SH&E Management System, ensuring the ongoing management of SH&E risk.

The current review assessed the TTC's SH&E performance between Q4 2020 and Q3 2021. The review was completed through analysis of the following inputs: performance indicators; impact of the COVID-19 pandemic; status of key SH&E projects and initiatives; audit and investigation findings; and regulatory oversight. The interim report was reviewed by the SX Committee in March 2022.

This report summarizes the full report of the annual review, which was approved by the SX Committee in April 2022. It includes the TTC's corporate level SH&E goals and objectives for 2022 to 2024.

Recommendations

It is recommended that the Audit and Risk Management Committee:

- 1. Approve the approach to continuously improving the effectiveness of the TTC's Safety, Health & Environment Management System, identifying priority safety, health and environment issues, and developing the TTC's safety, health and environment goals and objectives as described in this report.
- 2. Forward this report to the TTC Board for information.

Financial Summary

Approval of the recommendations in this report do not result in any financial implications beyond the funding included in the 2022 Operating Budget, as approved by the TTC Board on December 20, 2021 and City Council on February 17, 2022.

The Chief Financial Officer has reviewed this report and agrees with the financial impact information.

Equity/Accessibility Matters

A cornerstone of the TTC's Corporate Plan 2018-2022 is accessibility, and as a proud leader in providing accessible public transit in the city of Toronto, we are committed to ensuring reliable, safe and inclusive transit services for all our customers. This is supported by the TTC's SH&E Management System.

An effective and robust SH&E Management System is essential to the protection of communities, customers and employees who are disproportionately affected by safety, health and environmental systemic barriers. This may include Black, Indigenous and various racialized communities, people with disabilities, gender diverse communities (2SLGBTQ+) and other groups experiencing safety, health and environmental disparities.

Decision History

The TTC Audit and Risk Management Committee determined at its meeting on June 3, 2019 that this review would be presented annually to the Audit and Risk Management Committee and the TTC Board to provide members with information on the functioning of the TTC's SH&E Management System, which will help them fulfil their legislative duties as directors of a corporation, as set out in Item 7 at:

https://ttc-cdn.azureedge.net/-/media/Project/TTC/DevProto/Documents/Home/Public-Meetings/Audit-and-Risk-Management/2019/Jun-3/Reports/7_Annual_Review_of_TTCs_Safety_Health_and-Environment_Manage.pdf

Issue Background

The TTC's SH&E Management System is built on the TTC's commitment to protect the environment and the safety and health of its workers, customers and the general public. The SX Committee meets annually to review the SH&E Management System, to ensure its continuing suitability, adequacy and effectiveness. This review evaluates how well the SH&E Management System is functioning in supporting the safety and security cornerstone of the TTC's Corporate Plan.

Under safety and environmental legislation, TTC Board members are considered directors of a corporation and have prescribed duties to take all reasonable care to ensure that the TTC complies with safety and environmental legislation and all regulatory orders. As such, they should be aware of the TTC's SH&E Management System and its performance.

Comments

The information listed below summarizes the results from the analysis of the following inputs during the annual review process:

- Performance indicators;
- Impact of the COVID-19 pandemic;
- · Status of key SH&E projects and initiatives;
- · Audit and investigation findings; and
- Regulatory oversight.

SH&E Performance Indicators

The analysis of performance indicators is performed over a five-year period (October 2, 2016 to October 2, 2021) and a two-year period (October 6, 2019 to October 2, 2021) to present both the long-term and short-term movement of the data and highlight any significant trends. The table below highlights the performance indicators where **adverse trends** were observed:

Performance Indicator	Identified Trends
Occupational Health and Safety	Over the five-year period, a statistically significant upward trend is observed in the lost time injury rate (LTIR). The upward trend in the LTIR is being driven by an upward trend in emotional

Performance Indicator	Identified Trends			
	trauma injuries. Emotional trauma injuries result from <i>Acute Emotional Event (AEE), Assault, Threat</i> and <i>Collision</i> injury events. • <i>AEE</i> and <i>Assault</i> injury events represent the second and fourth highest injury event types and are contributing towards the upward trend in emotional trauma injuries. • The TTC has developed specific objectives to address these trends, including the following projects and initiatives: • Establishing a suicide prevention program and action plan; • Initiating a psychological health and safety project; and • Establishing an assault prevention action plan. • Working groups are in place to track and monitor progress of the action plans.			
Customer and Public Health and Safety	 The pandemic continued to impact TTC ridership, which impacted customer injury rates. Over the five-year period, there is enough evidence to support a statistically significant upward trend in the bus, subway station-related and subway vehicle-related customer injury rates. Over the two-year period, there is enough evidence to support a statistically significant upward trend in the subway station-related customer injury rate. Over the five-year period, there is enough evidence to support a statistically significant upward trend in the suicide attempts (including fatalities) rate. The TTC has implemented projects and initiatives to address the increase in customer injuries, including: Safety messaging (e.g. slips, trips and falls social media campaigns); Establishing a suicide prevention program and action plan; Studying the feasibility of retrofitting existing stations with platform edge doors (PEDs); and Training improvements (e.g. suicide awareness). 			

Performance Indicator	Identified Trends
Environment	Over the five-year period, there is enough evidence to support a statistically significant downward trend in the hazardous waste compliance. However, there is an upward trend over the two-year period due to improvements in communication, training and signage, as well as the consolidated hazardous waste contract.
Security	Over the five-year period, there is enough evidence to support a statistically significant upward trend in crimes against customers, crimes against employees and unauthorized at track level (UAT). Moreover, a statistically significant upward trend is observed in assaults (excludes sexual assaults) over the same period.
	Over the two-year period, there is enough evidence to support a statistically significant upward trend in crimes against employees and UAT.
	The TTC has implemented projects and initiatives to address the increase in security incidents, including:
	 Establishing an assault prevention action plan; and Frontline and community support.
Fire Safety	There is a year-over-year decrease in the fire protection system maintenance scores. This is due to an issue receiving reports for Electrical Substations, which was resolved. The scores for Plant Maintenance remained above 98% for the year.

SH&E Projects and Initiatives

The COVID-19 pandemic increased demand on available resources and impacted the implementation timelines of SH&E projects and initiatives. Throughout the pandemic, the TTC continued to implement control measures to protect the health and safety of its employees, customers and the public. The table below summarizes key developments towards the TTC's corporate level SH&E goals and objectives during the review period, with a focus on projects that have a significant impact across the organization:

Project and/or Initiative	Key Developments			
Occupational Health and Safety				
SH&E Management	The Safety Connect software went live in Q3 2020. Onboarding is being conducted in stages for incident reporting, investigation and corrective action tracking.			
System Software (Safety	Five departments have been onboarded into Safety Connect. The onboarding process has started for the Operations Group, with a target of Q3 2022.			
Connect)	The configuration of additional modules is underway, with a target of Q2 2023.			
Management of Occupational Health and	Hazard Identification and Risk Assessment (HIRA) and Job Safety Analysis (JSA) procedures are currently being implemented in a phased approach.			
Safety Hazards and Risks	Once implemented, each department will have at a minimum, a departmental HIRA supplemented with JSAs.			
	The goal is to create a PH&S Management System in accordance with CSA Z1003.			
Psychological Health and	The project team is conducting an organizational review that assesses 13 psychosocial factors to identify and assess risks.			
Safety (PH&S)	A report will be compiled with recommendations to reduce barriers and improve engagement as well as strategies to foster a healthy and safe culture.			
Operational	The Operational Rules Executive (ORX) Committee continues to approve new Rules and Rules Variances.			
Rules	In 2021, the first Subway Yard Rule Book (YRB) was approved.			
Oversight	Next steps include the creation of Rule Book Oversight Groups that will work with Rules Working Groups on major updates.			
	In the three years prior to the pandemic, there was a decline in random testing non-compliance.			
Fitness for Duty	In 2020, there was a slight increase during the first and second waves of the pandemic. In 2021, there was a much larger impact, with non-compliance increasing during the third and fourth waves.			
	The random testing selection rate was temporarily reduced during the pandemic. The TTC will be gradually increasing the random selection rate back to 20%. There will also be updates to			

	the Specified Management position criteria on the Desition
	the Specified Management position criteria on the Position Assessment Form.
	 A 10-point action plan was developed to address increasing trends in offences against employees. The plan was endorsed by the SX Committee in December 2021.
Security	The TTC has several established programs and recent initiatives to prevent assaults and provide support.
	The TTC also participates in weekly Furthering Our Community by Uniting Services (FOCUS) Tables that aim to reduce risk, harm, crime, victimization and improve community resiliency and well-being.
Customer and F	Public Health and Safety
	The primary tactic is to increase the number of employees with the knowledge and skills to recognize individuals in crisis and connect them to help and support.
Suicide Prevention Program	The Operations Training Centre provided in-class awareness training from LivingWorks to 220 TTC employees since 2020. E-learning was piloted amongst 386 frontline staff in Q1 2021.
	The PEDs study has been finalized and next steps are to be determined.
	The Traffic Safety Committee (TSC) consists of Department Heads and other members directly involved in surface transportation operations and maintenance.
Traffic Safety	An update on the key activities and accomplishments of the TSC was presented to the SX Committee in July 2021.
	The Corporate Program – Traffic Safety was approved by the SX Committee in August 2021.
Naloxone	In November 2020, the TTC determined it would continue the program with Special Constables. Expansion of the program to other customer-facing groups is under review.
Program	A corporate program has been drafted outlining the roles and responsibilities surrounding the administration, use and oversight of naloxone, with a target date of Q4 2022.
Occupational H	ygiene and Environment
Subway Air Quality	Health Canada, in collaboration with the University of Toronto and the National Research Council of Canada, conducted the Subway Air Quality Initiative from 2018 to 2020.

	The TTC is committed to monitoring levels of fine particulate matter (PM _{2.5}) and evaluating mitigation strategies, in addition to pursuing ways to improve overall air quality throughout the system. This includes:
	 Retrofitting existing work cars;
	 Upgrading filters on the older T1 revenue fleet;
	 Procurement of cleaner hybrid buses and electric buses;
	 Possibly conducting further transit air quality research; and
	 Piloting COVID-19-related air cleaning and filtration technologies.
	A company-wide radon study was initiated in 2020.
Radon Study	Phase 1 (substations) and Phase 2 (yards) have been completed. Radon concentrations were below Health Canada's action level in all areas measured.
	Phase 3 (surface properties), Phase 4 (subway) and Phase 5 (follow-up) are to be scheduled over the next several years.
Francosico	A corporate program was developed and resources for general instruction, awareness and self-assessments are available.
Ergonomics	Specific training modules for high-risk groups were developed, but have been deferred due to the pandemic.
Waste	The TTC-wide consolidated hazardous waste contract was completed and awarded in Q4 2020. As of Q4 2021, the contract is completely in effect with more than 50 cost centres on board.
Management	Training has been provided, storage units, including signage/labelling are in place and a tracking and auditing process has been implemented.
Spills Program	Site-specific Spill Contingency Plans have been completed for all operating facilities.
Idling Control	Implementation is expected to be completed by Q2 2022.
Fire and Life Sa	fety
Fire and Life	Fire code audits, fire drills, fire safety plans, Toronto Fire Services training and data point alignment are completed.
Safety	Fire access routes have been designed and approved at all properties except Wilson Yard.

Emergency Management and Business Continuity

Emergency Management and Business Continuity

- Operation functions were evaluated and improved through simulation exercises. Exercises focused on Automatic Train Control (ATC) and One-Person Train Operation (OPTO) processes.
- Assistance was provided to various corporate groups with the development of business continuity strategies focused on the loss of critical staff.
- The Business Continuity team is expected to expand throughout 2022.

Audits and Investigations

A number of audits and other safety assurance activities are conducted to examine different aspects of the SH&E Management System. Based on the findings, corrective actions are established and tracked on an ongoing basis.

Safety Assurance Checks focusing on COVID-19 control measures continued to take place to monitor compliance with physical distancing, vehicle disinfection and bus barrier and mask use. The findings are summarized and provided to the TTC Executive as part of the weekly COVID-19 dashboard.

As part of track level safety efforts, the Safety and Environment Department continued conducting track level safety observations during night shift operations to monitor work zone compliance.

In addition, the status of environmental audits, including waste management and storage tank system audits, is monitored to ensure corrective actions are tracked to completion.

Regulatory Oversight

The table below summarizes and compares the number of events and documents issued that involved interactions with regulatory agencies between Q4 2019 to Q3 2020 and Q4 2020 to Q3 2021. This includes interactions with the Ministry of Labour, Training and Skills Development (MLTSD), Ministry of Environment, Conservation and Parks (MECP), Technical Standards and Safety Authority (TSSA) and City of Toronto.

The increase in events and documents issued for Safety Complaints and Section 52 Notices were primarily related to COVID-19 concerns and occupational illness. All orders issued to the TTC have been complied with and are considered to be closed.

Type of Event/Documents Issued	Number (Q4 2019 to Q3 2020)	Number (Q4 2020 to Q3 2021)			
Occupational Health and Safety					
MLTSD Orders	11	17			
Regulatory Agency Interaction Reports (RAIR) Issued	133 interactions	256 interactions			
Work Refusals	21	25			
Safety Complaints	18	32			
Section 51 Notices (Critical Injury or Fatality)	24	22			
Section 52 and 53 Notices (Injury/Illness or Accident)	12	62			
Other (e.g. Inspection/Investigation, Witness Statement, Call to MLTSD)	2	6			
Environment	Environment				
TSSA Inspections and Orders	0	1			
City of Toronto Notices of Violation	1	0			
MECP Inspections and Orders	0	0			

TTC SH&E Goals and Objectives

The TTC will continue to focus on existing corporate-level SH&E goals and objectives and dedicate resources to advancing these items to completion in the assigned timeframe. The TTC's corporate-level SH&E goals and objectives for 2022 to 2024 are attached to this report as Attachment 1.

Contact

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Signature

Betty Hasserjian

Chief Safety Officer (Acting)

Attachments

Attachment 1 – 2022 to 2024 SH&E Goals and Objectives

ATTACHMENT 1 – 2022 TO 2024 TTC SH&E GOALS AND OBJECTIVES

The attachment outlines the TTC's corporate-level SH&E goals and objectives for 2022 to 2024.

The Group/Department level effort is categorized as follows:

Category	Percentage of Effort	Description of Effort
1	0 to 25	Safety and Environment to formalize or evaluate existing processes with minimal involvement required from Groups and Departments.
2	25 to 50	Development and/or implementation of a program with some existing processes and minor to moderate gaps. Group/Department effort required will vary by applicability of the program.
3	50 to 75	Development and/or implementation of a program with minimal existing processes and moderate to major gaps. Group/Department effort required will vary by applicability of the program.

The goals and objectives have been classified according to expected timeframe for completion, e.g. short-term, mid-term or long-term. The categories are as follows:

Category	Target Date
Short-Term	Six months (Q2 2022)
Mid-Term	Six months – one-and-a-half years (Q3 2022 – Q2 2023)
Long-Term	One-and-a-half – three years (Q3 2023 – Q4 2024)
Completed	N/A

Goal 1: Continue to strengthen and improve the effectiveness of the SH&E Management System (standards and foundational programs)

Objective	Lead Department	Involved Groups / Departments	Group / Department Effort	Target Date
Corporate Standard – PPE (implement)	Safety and Environment	All	1	
LRT Operations (incorporate into SHEMS)	Safety and Environment	LRT	1	Short-term
Emergency Management / Business Continuity (develop framework and organizational design)	Safety and Environment	All	2	Glieft telli
		Special Constable Service		
Naloxone Program (develop, implement)	Safety and Environment	Revenue Protection	2	
		Operations		
SH&E Software Phase 1 (implement incident reporting, investigation and corrective action tracking modules)	Safety and Environment	All	3	Mid-term
SH&E Software Phase 2 (implement additional modules)	Safety and Environment	All	3	
Hazard Identification and Risk Assessment Procedure (implement)	Safety and Environment	All	3	
Job Safety Analysis Procedure (develop, implement)	Safety and Environment	All	3	Long-term
Procurement Corrective Action Plan (establish, track)	Safety and Environment	Materials Management	2	

Goal 2: Reduce the frequency of lost time injuries at the TTC

Objective	Lead Department	Involved Groups / Departments	Group / Department Effort	Target Date
	Operations			
Employee Assault	People			
Prevention Action Plan (develop, implement)	Strategy and Customer Experience	All	2	Short-term
	Safety and Environment			
Psychological Health and Safety Program (assess, develop report)	Safety and Environment	All	2	
Musculoskeletal Disorder Prevention (Ergonomics) Program (implement)	Safety and Environment	All	3	Mid-term

Goal 3: Systematically manage occupational safety hazards with serious injury potential

Objective	Lead Department	Involved Groups / Departments	Group / Department Effort	Target Date
Fatigue Management (assess, develop report)		Operations		
(decede, develop report)		Vehicles		
	Safety and Environment	Infrastructure and Engineering (I&E)	1	
		Special Constable Service		
		Revenue Protection		
Electrical Safety Program (gap analysis,		Operations		
develop, implement)		I&E	3	Mid-term
	Safety and Environment	Vehicles		
		Engineering, Construction and Expansion (ECE)		
Machine Guarding Assessment (conduct,	Safety and Environment	Operations	3	
implement)		I&E		
		Vehicles		
		ECE		
Safe Operation of Powered Lift Trucks	Safety and Environment	Operations	2	
(implement)		Vehicles		
		I&E		
		Materials Management		
		ECE		

Objective	Lead Department	Involved Groups / Departments	Group / Department Effort	Target Date
Hazardous Energy		Operations		
Control/Lockout Tagout Program (implement)		Vehicles		
		I&E		
	Safety and Environment	Materials Management	3	Long-term
		Operations Training Centre (OTC)		
		ECE		
Active Fall Protection		Operations		
Program (implement)		I&E		
	Safety and Environment	Vehicles	2	
		Materials Management	_	
		ECE		

Goal 4: Update existing SH&E processes to ensure compliance with legislation and best practice

Objective	Lead Department	Involved Groups / Departments	Group / Department Effort	Target Date
Subway Air Quality (evaluate mitigation	Safety and Environment	Operations	1	Mid-term
strategies)		ECE		
Designated Substances Control Program (develop)	Safety and Environment	All	2	
Radon Study (conduct study, implement action plans)	Safety and Environment	All	1	Long-term

Goal 5: Manage business to ensure compliance with all applicable environmental laws and regulations

Objective	Lead Department	Involved Groups / Departments	Group / Department Effort	Target Date	
Waste Management Program (implement)		Operations			
Trogram (implement)		Materials Management			
	Safety and Environment	ОТС	3		
	Environment	Vehicles			
		I&E			
		ECE			
Subsurface Contaminant		Operations		Short-term	
Management Program (implement)	Safety and	Vehicles	1		
(implement)	Environment	I&E	1		
		ECE			
Idling Control Procedure (implement)		Operations	1		
Procedure (implement)	Safety and	Vehicles			
	Environment	Environment	I&E	'	
		ECE			
Environmental Awareness Training (develop, implement)	Safety and Environment	All	1		
(develop, implement)	Human Resources				
Storage Tank Program (develop, implement)		Operations			
(develop, implement)	Safety and Environment	Vehicles	1	Mid-term	
		I&E			
		ECE			
	(develop,	Operations	1		
		Vehicles			
		I&E			
		ECE			

Goal 6: Continue to improve and strengthen Traffic Safety

Objective	Lead Department	Involved Groups / Departments	Group / Department Effort	Target Date
		Operations	. 2	
		Maintenance		
Driver Safety Assist Systems (evaluate and pilot) Vehicle Programs	Vehicle Programs	Safety and Environment		
		ITS		
	Project Development and Planning		Mid-term	
Operator Risk Management Program	Operations	Safety and Environment	2	
(develop and implement)		ОТС		

Goal 7: Continue to improve and strengthen Track Level Safety

Objective	Lead Department	Involved Groups / Departments	Group / Department Effort	Target Date
Rule Book Oversight Groups (develop)	Safety and Environment	All	1	Short-term
		I&E		
		Vehicles		
Streetcar and	Streetcar Transportation	Operations		
Overhead Rule Books (update and issue)	Streetcar Infrastructure	отс	2	
	imastructure	Safety and Environment		
		ECE		
ATC Process Review	lement for ECE	Safety and Environment	2	
(identify, implement opportunities for improvement)		I&E		
improvement)		Operations		Mid-term
		I&E	2	
		Vehicles		
APTA Subway Yard Safety Peer Review		Operations		
Recommendations (implement action plan)	I&E	отс		
		Safety and Environment		
		ECE		
Corbona (ODT Date		I&E		
Book (update and	Subway/SRT Rule Book (update and issue) Safety and Environment	Vehicles	2	
		Operations		

	ОТС	
	Safety and Environment	
	ECE	

Goal 8: Continue to improve and strengthen Fire and Life Safety

Objective	Lead Department	Involved Groups / Departments	Group / Department Effort	Target Date
Fire Equipment Management Software (implement and integrate)	Safety and Environment	N/A	1	Short-term
Fire Safety Program (update)	Safety and Environment	All	1	
Subway System Track Level Fire Survey and Inventory (conduct and document) Safety and Environment	Safety and	Plant Maintenance		Mid to was
	Subway Infrastructure	1	Mid-term	

Goal 9: Ensure SH&E Management System is functioning effectively

Objective	Lead Department	Involved Groups / Departments	Group / Department Effort	Target Date
Facility Compliance		Operations		
Audits (conduct, address deficiencies)	Safety and Environment	I&E	2	
		Vehicles		Mid-term
SH&E Audit Schedule (develop, implement)	Safety and Environment	All	2	
Identify Bona Fide Requirements and Review Job	Talent Management	Safety and	2	Long-term
Descriptions (review, revise)	отс			

Completed SH&E Programs, Projects and Initiatives

Objectives		
Safety and Environment Department Communications (create, implement strategy and plan)	Link SH&E information and support with emerging technology (include SH&E in MyTTC SAP Jam)	
Traffic Safety Program (develop)	Fire Access Routes (determine and establish)	
External Third-Party Review of Emergency Management and Business Continuity Structure (review, receive report)	Fire Safety Plans (obtain TFS approval for surface properties)	
External Third-Party Review of SHEMS (conduct, receive report)		

Programs for Future Development and Implementation

Objec	ctives
Hazard and Near Miss Reporting Initiative (develop, incorporate)	Emergency Medical Reponses Standard (develop, implement)
Safe Work Planning (develop, implement)	Automatic External Defibrillator Program (develop, implement)
Real-Time Hazard Assessment Procedure (develop, implement)	Leading Indicator Metrics (propose, incorporate)
Contractor SH&E Management Standard (develop)	Utilities Management Program (develop, implement)
Service and Supply Contractor SH&E Management Program (develop, implement)	Safe Operation of Overhead Cranes and Hoists Program (develop, implement)
Construction SH&E Management Program (develop, implement)	Safe Operation of Vehicle Lifting Devices (develop, implement)
Smoke-Free Workplace Policy (update, implement)	Ladder Safety Program (update, implement)
Managing Cold Stress Procedure (develop, implement)	Mobile Elevated Work Platform Program (develop, implement)
Managing Heat Stress Procedure (develop, implement)	Scaffolding Program (develop, implement)
Training and Competency (evaluate)	Workplace Inspection Standard (develop, implement)
Hot Work Standard (develop, approve)	