



August 31, 2011

Ms. Judith Wolfson
Chair, Governance and Human Resources Committee
Board of Directors
Technical Standards and Safety Authority
14th Floor, Centre Tower
3300 Bloor Street West
Toronto, ON
M8X 2X4

Dear Ms. Wolfson,

Re: Review of ANNUAL PUBLIC SAFETY PERFORMANCE REPORT 2010/2011

Thank you for the opportunity to review the report entitled: Annual Public Safety Performance Report 2010/2011. I was asked to review the report, from a safety perspective, in my capacity as the Chief Safety and Risk Officer for the TSSA.

My general comments in respect of past reports that I have had the opportunity to review, both from a learning perspective and in my role as the CSRO, have been along the following lines:

- Given the technical style of reporting by the authors, the messaging would be difficult to discern by the average reader.
- While reporting trends has its benefits, the average Ontarian may find it challenging to conclude the services provided by the TSSA have made Ontario a safer place to work and live.

I am pleased to report that the report under review is a decided improvement but with room for continuing positive development in respect of the observations made above.

In particular, the opening message from the President and CEO, for me, strikes an excellent balance between providing the important messages and in a style of expression that is both readable and reassuring.

Any report from a technical entity will, of necessity, need to be somewhat technical in style. It is therefore important that acronyms and initials be avoided where possible. Where they cannot be avoided, definitions should be provided at the front end of the report. By way of example, I reference the paragraph on page 3 of the report beginning: "Throughout the year..." The reference to MCS should be set out in full. The same would be true for both RIDM and DALY which appear later on in the report.

Ms. Milsom and I have discussed the technical style of the report which I have characterized as (with the greatest of respect for engineers everywhere) "engineer speak". By way of example, I reference page 5 – Fuels – Safety Outcomes – Key Finding #1 – "1,276 occurrences were reported and found to be within TSSA jurisdiction during the last fiscal year. This contributes to a decreasing trend in the number of occurrences observed since the third quarter of the fiscal year 2006/2007." For the last sentence one wonders if anything would be lost by simply saying: "This indicates that fewer occurrences were observed when compared with previous years."

In a similar vein – on the same page 5 – and by way of example only – Compliance Outcomes – Item 1 – Key Findings – the report indicates that during periodic inspections at fuels licensed sites, 46.88% were found to be compliant during the first visit. This reference suggests that approximately 33% were not compliant on the first visit, a percentage that on its own seems significant no matter what the trend might be. It may therefore be advantageous and support the hard work of the TSSA professionals to say a word or two about reducing the 33% and striving for 100% even though having 100% compliance on the first may not be attainable for a number of practical reasons.

Without repeating the details here, questions have arisen (and have been addressed) about the completeness of some databases under the purview of the TSSA. This is referenced only to suggest that on page 7 of the report – Risk Informed Periodic Inspection Scheduling and Enforcement, there may be merit in adding a bullet to describe the work being done by the TSSA to address database accuracy and completeness.

On page 11, given the mandate of the TSSA, one may wish to reconsider the use of the metaphor "cradle to grave".

To repeat my opening comment, I believe that the style of the opening remarks of Ms. Milsom as set out at the beginning of the report is refreshing. I would also observe that



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the style has taken nothing away from the thoroughness of the messages contained therein. It may be that, over time, this manner of messaging will find its way into the remainder of the report. I underscore the point mainly in the interest of making the report more readable and more easily understood by the average Ontarian.

From a safety perspective, I would conclude that the report contains the necessary data and narrative to accurately describe the public safety performance of the TSSA for the year 2010/2011.

Thank you for the opportunity to comment.

Sincerely,


Norman D. Inkster
Chief Safety and Risk Officer
Technical Standards and Safety Authority

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cc: D. Scriven
K. Milsom



CSRO's Review of Annual Public Safety Performance Report

TSSA's Response to Recommendations

Purpose – For Information

The purpose of this document is to provide management's responses to recommendations made by the Chief Safety and Risk Officer (CSRO) in his review of the Annual Public Safety Performance Report, as requested by the Board of Directors.

Recommendation and Management Response

Page	Recommendation	Management Response
i - iii	<p>My general comments in respect of past reports that I have had the opportunity to review, both from a learning perspective and in my role as the CSRO, have been along the following lines:</p> <ul style="list-style-type: none"> Given the technical style of reporting by the authors, the messaging would be difficult to discern by the average reader. While reporting trends has its benefits, the average Ontarian may find it challenging to conclude the services provided by the TSSA have made Ontario a safer place to work and live. <p>I am pleased to report that the report under review is a decided improvement but with room for continuing positive development in respect of the observations made above.</p> <p>In particular, the opening message from the President and CEO, for me, strikes an excellent balance between providing the important messages and in a style of expression that is both readable and reassuring.</p>	<p>TSSA is committed to making the Annual Public Safety Report more reader friendly, in particular by using plain language.</p> <p>In this year's report, TSSA added an executive summary directed to the general public. For industry members, who expect more detailed, technical information, the safety data has been preserved in the body of the report. We believe this approach appropriately balances the desire of the broad public for plain language communications about our work against the needs of industry for technical information. We look forward to feedback from readers to guide further enhancements for next year.</p>
3.	<p>Any report from a technical entity will, of necessity, need to be somewhat technical in style. It is therefore important that acronyms and initials be avoided where possible. Where they cannot be avoided, definitions should be provided at the front end of the report. By way of example, I reference, in the paragraph beginning "Throughout the year ..." the reference to MCS should be set out in full. The same would be true for DALY and RIDM which appear later in the report.</p>	<p>All acronyms are defined in first use. Next year's report will include an appendix of common acronyms.</p>
5.	<p>Ms. Milsom and I have discussed the technical style of the report which I have characterized as (with the greatest of respect for engineers everywhere) "engineer speak". By way of one example I refer to Fuels – Safety Outcomes – Key Findings #1 – "1,276 occurrences were reported and found to be within TSSA jurisdiction during the last fiscal year. This contributes to a decreasing trend in the number of occurrences observed since the third quarter of the fiscal year</p>	<p>We simplified the language to make the statistical analysis clearer and will continue to focus on reducing technical language' to ensure TSSA communications are comprehensible to the broader public.</p>



CSRO's Review of Annual Public Safety Performance Report

TSSA's Response to Recommendations

Page	Recommendation	Management Response
	2006/2007". For the last sentence I am wondering if anything would be lost by simply saying: "This indicates that fewer occurrences were observed when compared with previous years.	
5.	In a similar vein, by way of example only – Item 1 under Compliance Outcomes – Key Findings - we report that during our periodic inspections, 46.88% were found to be compliant during the first visit. This suggests about 33% were not which seems significant no matter what the trend might be so maybe a word or two about the TSSA efforts in that para. to reassure Ontarians that TSSA is on the case – as I know they are.	We will continue to enhance the clarity of all TSSA messaging to the broader public.
7.	Without repeating the details here, questions have arisen (and have been addressed) about the completeness of some databases under the purview of the TSSA. This is referenced only to suggest that on page 7 of the report - Risk Informed Periodic Inspection Scheduling and Enforcement – there may be merit in adding a bullet to describe the work being done by the TSSA to address database accuracy and completeness.	The report was revised to note the ongoing work the TSSA is doing to improve database accuracy and completeness.
11.	Boilers and Pressure Vessels – given the mandate of the TSSA, one may wish to reconsider the use of the metaphor "cradle to grave".	The report was revised to include the editing suggestion.