



Summary of Ice Surface Plant Advisory Stakeholder Feedback

TSSA has completed a consultation on ice sheet plant safety. TSSA would like to thank all individuals who took part in the consultation. This is a summary of stakeholder feedback received during the consultation and how that feedback was incorporated, where applicable.

Background

TSSA is proposing an advisory on plant safety at ice surface sites. The purpose of the advisory is two-fold:

1. To draw attention to the maintenance of aging plant infrastructure at ice surface sites in Ontario.
2. To clarify the roles of individuals and groups in the process required to maintain safety at community centres and other sites housing ice surfaces in the province.

TSSA did preliminary consultations with key stakeholders, and this consultation that closed in February was meant to seek input from the broader operating engineering industry on the draft advisory.

The consultation began on January 9, 2023 and closed on February 8, 2023. TSSA received a total of 13 responses.

Feedback Summary

TSSA categorized the feedback into three themes.

1. General comments including requests to clarify language on the advisory
2. Training
3. Suggested additions to the advisory

The table below summarizes the feedback received along with any actions TSSA has taken on the feedback.

Theme	Stakeholder Feedback	TSSA Response	TSSA Action
General	Very well done. Clear and to the point	TSSA acknowledges the feedback with thanks	None
	With allowing Package units and lower HP Plants to operate without a Certified Attendants "B Certificates" does not make sense. These Plants are just as	Packaged units are designed to keep refrigerants in the Engine Room. Technology advancements	None



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	dangerous/deadly as Guarded Plants and should require the same care, attention and regulations.	have allowed much less refrigerant to be used. This advisory does not add or remove any attendant requirements.	
	Can the "owner" be the CAO or Department Head? The definition of "User" is better defined. Agree with all the other areas.	Owner and/or User should be defined in front of logbook.	None
	Pleased with the advisory as stated. Will your final document be clear as to where an Owner/User information and/or certification will be documented/recorded so as to have a consistent communication/directive process?. I like the language to owner/user but will ask where does that information get completed with TSSA?	Owner and/or User should be defined in front of logbook.	None
	Advisory overall approach is sound. Implementation and effectiveness monitoring will be the key. 1. Ensure all new and upgraded sites comply. 2. Find and inventory within the next 6 months all existing sites and confirm their compliance requirements and compliance capability. Based on forward experience statistically inspect inventory for compliance and Advisory effectiveness.	Compliance will be assessed during periodic inspections. Inspectors will support training during periodic inspections.	TSSA will complete advisory updates during periodic inspections.
	This advisory helps in clarifying various aspects of the regulation.	TSSA acknowledges the feedback with thanks.	None
	More onus on the owner of plants rooms. Recommendation for TSSA to streamline its own basic checklist for these plant rooms.	One of the purposes of the advisory is to clarify roles and responsibilities in arenas. The Owner holds the ultimate responsibility.	None
Training	Stricter rules are needed for the plant owners to be responsible for training. Asking for documentation during	TSSA establishes standards and issues certificates. A list of	None



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	<p>TSSA inspection for all trained staff that are signed off in the book must meet a specific TSSA standard or certification platform could be implemented. In saying so, creating a training platform through the TSSA wouldn't be a bad idea. TSSA could come up with a mandatory checklist on what must be covered during training and from there supervisors/managers and owners can go over it in relation to their own operation. An idea based on simplifying training. High turnover rate of staff, costly and time-consuming training courses are the toughest obstacles our industry encounters. These jobs are paying just above minimum wage for part-time operators and chances are they are not staying long-term. So, investing time and money makes it hard on the owner. Simplifying the training process from the governing body could help streamline how and when staff can be trained while ensuring all must knows are covered. i.e., through a supervisor, manager and/or maybe the contractor themselves. This is with respect to registered unattended plants only.</p>	<p>accredited training providers is available on TSSA's website.</p>	
	<p>It appears in our area unguarded and unattended is the norm. In rural arenas the personnel will be appointed by township officials and more to cleaning ice, cleaning arena than maintenance work. Seems somewhat unmonitored for the most part.</p> <p>The potential for injury or death is often not seen by untrained employees. Prevention can't be part of the job if the people there on site the most are not trained in what to look for. Can they hear if something is wrong? Yes, most people can train themselves to know that doesn't sound right, what the scary part is what they do next, go in the room, call for service, ignore it? How does the untrained person know what noise requires what</p>	<p>Minimum training required. Emergency procedures must be available as well as Call Lists. This advisory seeks to clarify the minimum requirements.</p>	<p>None</p>



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	<p>action? With the financial pressures townships and small towns are under, regulations might be the only way to assure the proper maintenance is completed on time, and by the properly trained personnel.</p>		
<p>Suggested addition to advisory</p>	<p>The two paragraphs "Unattended Plant Asset Management Plan" and "Holiday & amp; Seasonal Closure Inspections" are vague, they do not specifically outline requirements, and this could lead to differing interpretations by both owners and inspectors. Recommend the owner be advised as to minimum expected requirement.</p> <p>Proposed Change 1 The plant user must create and maintain an asset management plan that tracks life expectancy and replacement of all key pieces of refrigeration equipment, infrastructure, and safety devices. The asset management plan must follow all applicable legislation, codes, OEM recommendations, constructor's maintenance guidelines and industry association recommendations.</p> <p>Proposed Change 2 The plant owner and/or user is responsible for ensuring that any unattended guarded plant remains safe during holidays and extended periods of closure. A monitoring system must be in place to both log and provide remote notification of important refrigeration safety malfunctions including a refrigerant leak. An action/response plan must be in place and tested at least once per year. During holidays (while the refrigeration system is operating in automatic mode) physical inspections must be done at least once per day by competent personnel. During a seasonal closure (when the refrigeration system has been deactivated and prepared for an extended</p>	<p>Training in industry best practices will allow for this knowledge. Asset Management forms will be available through training providers.</p>	<p>TSSA will add appropriate language to the advisory to address long term shutdown, decommissioning and dismantling a refrigeration plant.</p>



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	shutdown) physical inspections must be done at least once per month by competent personnel. All site inspections must be logged.		
	A maintenance plan for all facilities should be maintained by indicating whether done by a contractor or volunteer. In reading what happened in Kamloops, BC communication seems to be the issue for a loss of life	A maintenance plan is required for every facility. TSSA acknowledges the Kamloops incident and will include an additional statement in the advisory in relation to this.	TSSA will add appropriate language to the advisory to address long term shutdown, decommissioning and dismantling a refrigeration plant.

The registered, unattended ice surface plant advisory has been posted on our [website](#).

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