



2012-2014 FEE SETTING CONSULTATION REPORT

May 25, 2012

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EXECUTIVE SUMMARY

- Consultation on the proposed fee changes was undertaken in two phases:
 - Phase I took place from January to March with a series of dialogues with key clients and stakeholder associations on the proposed maximum 5% increase for 2012 and a maximum 3% for 2013 and 2014.
 - Phase II took place from April 11 to May 18, 2012. A revised fee proposal was presented: a weighted average of 3% for 2012, 2013 and 2014.
- The consultation consisted of a thorough distribution to clients and stakeholder associations with a total of 87 clients/stakeholders providing written feedback.
- 56% of the respondents indicated an acceptance of the proposed fee changes, with 38% disapproving of the proposed fee changes.
- Respondents indicated that their preferred order for the fees, in terms of safety services, was: assessment and education equally, then enforcement and lastly research.
- Written comments from respondents on the proposed fee changes were divided into four themes: 1. Fee changes, 2. Fee structure, 3. Service delivery and 4. Value proposition.
- Clearly, the present fee structure is a pain point for many of the respondents and there was no shortage of suggestions on what areas require adjustment.
- The areas of service delivery that were most frequently referred to: inspection and enforcement and then education and communication.
- Mixed reviews emerged when referring to the fee increases and perceived return on investment. A significant number of respondents recognized the value of TechTalks and the importance of informing industry of the current codes and regulations. Another group of respondents were not as convinced about the value added and commented on their perception of not getting value for the current safety services.

INTRODUCTION

When making any major decision, the BC Safety Authority engages its clients in the decision-making process, particularly when it relates to direct impacts, such as fees. Having previously listened to its clients and being sensitive to the economic downturn, the BC Safety Authority has, for most safety programs, maintained fees at 2008 levels. Like many of its clients, the BC Safety Authority has tried its best to keep its costs down without compromising safety services. Unfortunately, the BC Safety Authority has run deficits in 2010, 2011 and despite continued austerity measures, it will operate under a deficit in 2012.

As an independent, not-for-profit organization, the BC Safety Authority relies (solely) on industry permitting for its revenues and can only manage its cost pressures to a point. In order to effectively continue providing professional regulatory oversight and a high level of client services, the BC Safety Authority needed to increase its fees.

In being sensitive to the slowly recovering labour market, the BC Safety Authority approached this client/stakeholder engagement process in two phases. The first phase consisted of two senior management team members, the VP of Corporate Services and the VP of Operations and Service Excellence, meeting directly with a number of key clients and stakeholder associations to discuss the proposed fee increases. The initial proposal called for a maximum 5% increase in 2012 and a maximum increase of 3% for 2013 and 2014. The recurring response was mixed but some suggested that the increased cost pressures would negatively impact businesses in a competitive market.

In recognition of the negative impact yet needing to offset its growing deficit, the BC Safety Authority revised its proposal: a weighted average of 3% in 2012, 2013, and 2014. These fee changes impact the Boiler/Pressure Vessels & Refrigeration, Electrical, Elevating Devices and Gas Safety Programs. Passenger Ropeways and Amusement Devices Safety Programs had consultation and fee increases in 2011. The Railway Safety Program will have a separate consultation on its proposed fee changes, commencing June 2012.

This report reflects the results of the feedback from a broader base of clients/stakeholders during phase II consultation.

METHODOLOGY

Phase I

An invitation was extended to the top ten clients, by revenue, in boiler, electrical, elevating devices and gas safety programs. The BC Safety Authority met with representatives from four elevating devices clients, three electrical clients, one gas client, and six industry associations. See Appendix A: Phase I Client/Stakeholder Contacts for a listing of contacts.

Phase II

This phase reached a much broader audience and through a much more structured process:

- Repeat invitations to all phase I clients/associations;
- Over 200 direct contacts to a random sample of large, medium and small size clients;

- Distribution to all industry associations with a request to extend the invitation to all their members;
- Printed materials at all BC Safety Authority offices, information sent to BC Online for distribution and Service BC. Request to all client service representatives to inform and encourage clients to provide feedback;
- Posting on BC Safety Authority website and advertisements in a limited number of professional journals.
- Consultation period was from April 11, 2012 to May 18, 2012.

Phase I consultation was basically an open-ended conversation between BC Safety Authority and specific clients/associations on the merits and impact of the proposed fee changes. Phase II was a more structured process with a combination of closed and open-ended questions in a feedback form.

The feedback form focused on:

1. Overall rating on the proposed fee change;
2. Stakeholder preference in relation to primary services;
3. Open-ended question related to unreasonable or problematic fees;
4. Interest in participating in future fee structure consultation; and
5. General information on respondent.

CONSULTATION FINDINGS

Quantitative Findings

1. Overall Feedback

Overall feedback	#	%
Responses received	87	
Positive	49	56%
Negative	33	38%
Neutral/ No opinion	5	6%

In comparison to previous fee change consultations, the total number of respondents and number of respondents who considered the proposed fee change as positive (acceptable & somewhat acceptable) compared to being negative (not acceptable) or neutral (no opinion) was positive.

2. Preferred Primary Services

Services preferred	#	%
Forms received	54	
Assessment	39	72%
Education	39	72%
Research	26	48%
Enforcement	32	59%

Assessment (inspections and audits) and education (TechTalks and public awareness / education initiatives) tied for the top preferred safety services, followed by enforcement and lastly research.

3. Profile of the Respondents

Respondents	#	%
By Type / Safety Program		
Contractor	34	63%
Boiler	3	
Electrical	24	
Elevating Devices	4	
Gas	8	
Certified individual	19	35%
Boiler	7	
Electrical	8	
Elevating Devices	5	
Gas	8	
Building owner/manager	10	19%
Operating permit holder	16	30%
Boiler	7	
Electrical	7	
Elevating Devices	6	
Gas	2	
Other	11	20%

The breakdown of respondents by revenue, type of professional background and safety programs provides a good cross-section of clients/stakeholders to interpret the qualitative findings.

4. Interested Clients/Stakeholders in Future Fee Structure Consultation

Out of 54 respondents responding through feedback forms, 34 or 63% indicated that they are interested in participating in fee structure consultation. Six of the respondents expressed interest in participating in two or more safety program discussions.

Qualitative Findings

Appendix B: Transcripts of Phase II Consultation provides all of the feedback from the phase II consultation.

The feedback is divided into four themes:

1. Fee Changes;
2. Fee Structure;
3. Service Delivery; and
4. Value Proposition.

An explanation of the specific issues raised within each theme is outlined below.

Recurring feedback as provided by participating clients/stakeholders:

Theme: Fee Changes

1. **General Acceptance:** Generally, comments that reflect an understanding for and acceptance of the fee changes:
 “Have no problem with your proposed fee increases. There have been no increases for several years.....”(electrical contractor);
 “The industry understands the need for a rate increase now. It does think that the weighted 3% average you have proposed is reasonable for 2012 and 2013.” (industry association representative);
 “I have read through your proposed fee increases and they do not seem out of line. I would not have any objections to these increases.” (plumbing & heating contractor).
2. **Somewhat Accepting:** Generally, comments that express an understanding for the increases but have a concern:
 “If everyone plays fair, we would have no issues.” (electrical contractor);
 “No one likes fee increases. The fact is almost every year it happens”. (air-conditioning contractor).
 “I think it is important to have a good service level and adequate IT abilities. However, budgets are very tight and any increase in operating costs can be difficult to deal with.”(boiler/pressure vessel owner).
3. **Not Acceptable:** Generally, comments that express a definite non-acceptance to the proposed fee changes:
 “In view of net zero increases for labour and the weakness of the industry as a whole, I believe that savings should be sought rather than fee increases.” (electrical contractor);
 “I feel the fees charged by BCSA, at this time, are significant and the return value added is minimal.” (refrigeration sector representative);
 “We don’t see any improvement in service from the BCSA now and haven’t over the years, it has declined.....Unless we see an improvement in service the increases are not warranted.” (forestry industry).

Theme: Fee Structure

1. **Lower end is price sensitive:** Frequent reference was made about lower end installation pricing being too expensive resulting in permit avoidance and avoiding licensed contractors.
2. **Need to simplify:** It is not so much the fees as it is the complexity of the fees.
3. **Specific safety program fees:** re-inspection fees, refrigeration permit on roof top units needs review, gas appliance replacement fees are too high, etc.

All fee structure comments have been forwarded to those conducting the fee structure review and they will be incorporated into the fee structure consultation process.

Theme: Service Delivery

The specific areas of service delivery that respondents most often referred to were:

1. **Inspection & enforcement:** frequent reference was made to the importance of regulatory oversight being fair and equitable;
2. **Education and communication:** it is important to continue expanding on education and communication about changing codes and regulations.

Theme: Value Proposition

1. **Perceived value:** a number of respondents expressed concerns about the value of the TechTalks and the importance of having trades people maintain current with the codes and regulations.
2. **Increased expectations:** as well, a number of respondents assumed that there ought to be an improved level of safety services for the fee increases and do not think that is the case. Some think that increasing safety service can be achieved without raising fees by focusing more on achieving service efficiencies with the current staffing.

SUMMATION OF FINDINGS

- A majority of respondents (58%) found the proposed fee increases to be acceptable or somewhat acceptable. 36% of the respondents did not find the proposed fee increases acceptable.
- The order of preference for safety services are: the conducting of assessment and education safety services, followed by enforcement and research.
- Clearly, the present fee structure is a pain point for many of the respondents and there was no shortage of suggestions on what areas require adjustment. Note: fee restructuring is a subject scheduled for consultation later in 2012
- The areas of service delivery that were most frequently referred to: inspection and enforcement and then education and communication.
- Mixed reviews emerged when referring to the fee increases and perceived return on investment. A significant number of respondents recognized the value of TechTalks and the importance of informing industry of the current codes and regulations. Another group of respondents were not as convinced about the value added and commented on their perception of not getting value for the current safety services.

Appendix A: Phase I Client/Stakeholder Contacts

Safety Program	Clients	Associations
Boiler, Pressure Vessels and Refrigeration		<ul style="list-style-type: none"> • Mechanical Contractors Association (Prince George Chapter)
Electrical Safety Program	<ul style="list-style-type: none"> • Keldon Electric • Horizon Electric 	<ul style="list-style-type: none"> • Electrical Contractors Association
Elevating Devices Safety Program	<ul style="list-style-type: none"> • Kone Inc • Thyssenkrupp Elevator (Canada) Ltd • Schindler Elevator Corporation • Garaventa Lifts 	<ul style="list-style-type: none"> • Canadian Elevator Contractors Association
Gas Safety Program	<ul style="list-style-type: none"> • Keyera Energy • Fortis BC 	<ul style="list-style-type: none"> • Canadian Association of Petroleum Producers (BC members)
Across Safety Programs		<ul style="list-style-type: none"> • Independent Contractors & Businesses Association • Building Owners & Managers Association

Appendix B: Transcripts of Phase II Consultation

Transcripts from forms received

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Sugges tions
Not acceptable	BC's natural gas industry is dealing with a deeply depressed commodity price...the lowest in a decade...rendering much of BC's natural gas production marginally profitable or making losses. As a remote producing region in North America, BC has some of the most challenging circumstances and high costs to get gas to market.							
Somewhat acceptable	If everyone plays fair we would have no issues. Our biggest issue with the permit fees is on the low end of the installation/permit values.		X	X			Again the low end of the installation value and permit fees is where we feel these fees hurt us the most. This is likely because we feel that not everyone is compliant in taking permits out on small jobs.	

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
Somewhat acceptable	Given the down turn in the B.C. economy it is a terrible time to raise fee's	X	X	X	X		The fee's for a small job is to high, it promotes small job's to be done without a permit	
Somewhat acceptable	A 3% increase 2013 only, when the provincial government changes in May 2013 there will be a major slow down, work will be hard to come by, further permit increases will only add to the burden.	X	X		X		1. City codes should not be required. 2. Get a refund online. 3. Total connected load often not known. 4. Make changes to permits online. 5. Commercial gas rates: Up to 10m - \$108.00 100m to 250m - \$130.00 250m to 500m - \$160.00 500m to 750m - \$189.00	Tech talks are very helpful.

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Sugges tions
Somewhat acceptable	Supplies and office cost are increasing so increasing fees to offset is reasonable. If it cost's \$3 to process something it doesn't make sense to charge \$2.	X		X		Inspections and enforcement of rules. If you are supposed to have a 3 to 1 ratio then there should be a fine levied for not having that for repeat offenders. Some of the companies around town have 4 jobs running at the same time and only 2 Journeymen in the company one on every other site. When we lower our training standard we weaken the stock of our labour pool.	simple fee increases are acceptable as long as everyone is incurring the same costs. If 3 contractors bid on a job all three should be paying the same costs for fees for that job.	I strongly disagree with giving yourself a pay increase of 3% per year. I think there should be a starting wage and a top salary wage and if you don't like the salary range choose a more suitable career. You state that you are aware of the fact that the economy is in the toilet and many of us are out of work. The entire public sector is being mandated to a 0% increase in wages but you feel that we should take food off our table so you can eat better. Our wages have decreased as electricians and there is no upward trend. So, NO I DON'T FEEL LIKE WE SHOULD ENTERTAIN THE IDEA OF FLUSHING YOUR POCKETS.

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
Not acceptable	in view of net zero increases for labour and the weakness of the industry as a whole, I believe that savings should be sought rather than fee increases.	X	X	X			I feel happier complying with code rules that were based on real science rather than guesswork i.e. system grounding wire sizes.	Fees should reflect cost recovery. What are the costs in renewing contractor licenses?
Acceptable	The cost of everything is going up	X	X	X	X		All of the above are integral for the highest of safety standards.	
Acceptable	It's the cost of doing business.	X	X		X			None that I am aware of.
Somewhat acceptable	It occurs at a time when the economy is in the tank	X	X		X			
Acceptable		X	X					I feel the fee increase is necessary and appropriate.
Acceptable	I would prefer no additional costs, however if increases are required to account for increased	X	X	X	X		We believe these are all required for the continued safe operation	No there are no problematic fees or concerns.

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Sugges tions
	expenses to provide the services listed below in question 2 I would pay without issue.					of pressure equipment in the province.		
Acceptable		X		X				
Somewhat acceptable			X	X				
Acceptable		X	X	X				
Somewhat acceptable	What value do we receive? Inflation is 1-2%, that's OK	X	X		X	More enforcement and inspections	No	More inspections
Not acceptable	The letter states there has been a fee freeze for 4 years yet in 2009 there was a 4% increase.	X					The refrigeration permit on RTU, that's unreasonable	
Somewhat acceptable	No one likes fee increases. The fact is almost every year it happens.	X	X		X	I like to see inspectors on the job sites, also the Safety Authority at meetings with	I believe the fees should be accepted, more often proof of installations need to be shown for insurance/sale of a	

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
						Fortis, or code changes, etc.	home etc. I am aware the Safety Authority covers more than my spectrum of work, I only voice my opinion from this point.	
Somewhat acceptable	Though the fee increases seem reasonable in the light that BCSA has not increased fees for some time, Encana struggles with the tie of the fees to the expected deliverables. The BCSA mandate of helping assure public safety, is not well served by a per-vessel license fee. In general, Encana does not have a concern with the fee increase but rather the fee structure and the administrative burden it brings with no apparent improvement in safety.	X	X	X		Encana expects real value out of audits. As an owner with an equivalent standards agreement, inspection and self auditing is part of our mandate, but it is a vital part of our program to have an outside perspective from time-to-time. Encana places value on continuing education and if BCSA can facilitate this, it	The fees themselves are not a problem, just the structure and complexity of the fees.	

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Sugges tions
						<p>would be appreciated. Public awareness of the protective measures in place is vital to keep the public confident in industry to keep them safe.</p> <p>Encana values research and how it can get industry doing the right things rather than maintaining the status quo.</p>		

Overall	Explanation	Assessment Evaluation & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
Acceptable	CNRL is not opposed to the proposed fee increases.		X		Consistency with Adopted Programs	SMP – CNRL has approached BCSA on a new way of managing safety and pressure vessels. Because of people or program changes within BCSA, some of the processes have been regulated to OGC. CNRL would expect a higher level of synergy or alignment between the two jurisdictional authorities.	CNRL does find the Operating Permits to be problematic because of the volume and format difference between BCSA and what CNRL has when we try and reconcile to active equipment.	Does BCSA conduct statistical analysis from NCR's / safety surveys of the Oil and Gas Industry to provide a capture mode for improving safety / equipment design methods?
Acceptable		X	X		on going training for inspectors, keep us up to date		No	

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
Not acceptable	From 2008 I had to decrease my hourly charge to customers and I didn't increase, in mean time, and I am not going to in the near future.	X	X			-Basic work : inspections -Code education	Fees for small works e.g. for \$100 the fee is about \$45 that is 45%!	
Acceptable	In line with general inflation	X	X	X	X	Normal scope of BC Safety Authority functions	No	
Acceptable	Getting out to the trades with Regular TECK talks is worth this in itself.	X	X	X	X	Having the Safety Authority Branching out to ongoing Education is welcome news.		
Not acceptable	why charge more for a service that doesn't provide the service correctly in the first place? I've been involved in the elevator service since Jan, 2012 here and have had nothing but problems with the BCSCA with the service and not getting the correct information.....				X	you are not providing proper service for what is charged right now.....	N/A	

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Sugges tions	
Not acceptable	The starting fee for Renewal of Elevating Contractor Licence and new licence fee are WAY too high. As matter of fact I am a holder of a valid TSSA class A licence and it cost me only \$70 every to years. The yearly increase would be fine if the start point is more in line with other provinces.	X		X	X		Companies are getting away with murder. Nobody police them, even when they get caught the ignore and play dumb. Fines must impose and removal of licence for repeat offences.	See #1.	
Not acceptable	Your inspectors are not very well controlled, you have inspectors hiding in parks and parking lots not wanting to go back to the office for fear of their jobs. You need a proper dispatching system and the inspectors vehicles need to be gps monitored, and you need a proper dispatcher controlling the inspectors and	X	X	X	X	the inspectors need to inspect, not trust the contractors and not go back and inspect.	the inspectors need to inspect, not trust the contractors and not go back and inspect jobs as often happens.	I don't think you need to increase fees you need to hire a proper dispatcher and gps monitor you inspectors vehicles, you would find a lot of hiding inspectors and you efficiency would double. I cannot run a proper service company without a dispatcher, dispatching program and gps monitoring of our service trucks,	As always, I will never understand why the whole lower mainland cannot work under 1 system, every municipality is in its own world, Vancouver has its rules, Burnaby in its own world WHY? this is so terribly inefficient and makes contractors lives a nightmare. And they both have problems with hiding inspectors taking advantage as well. Again the system is terribly inefficient. And there is a lot of money being wasted, the inspectors

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
	guiding them! you have A LOT of inefficiencies you are not even aware of, I know because i have friends who are inspectors, you need to TIGHTEN UP you control and execution methods. A lot of money is being wasted in inefficiencies!!						why is it that the inspection dept allows its inspector to run around unsupervised, and believe me they do take advantage of you!! = lost \$\$\$	individually can do a lot more than they currently are. You need to be more efficient not increase rates.
Not acceptable	At some point in time Government needs to be reminded to work within their means, just like private individuals. It is very easy to spend someone else's money. Contractors have to pass this cost on to customers, which is you and me. Take a novel approach and reduce input costs. If this results in reduced services so be it. The sky won't fall	X				Stick to the basics, issue a permit, go inspect if required and close the file.	The optics are such that it doesn't appear to be large increases in the electrical fees but it all adds up. New home construction costs in the Vancouver area are already beyond the reach of the average new homeowner. Add in the extra fees for both electrical and gas and that is just ne component.	

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Sugges tions
	down.							
Acceptable	An acceptable and reasonable increase if deficits are being incurred.	X	X	X	X		A constant monitoring of safety in the field and attention to good workmanship practices.	Not at the present time.
Not acceptable	I support raising the fees for the permits themselves as we can pass these costs on. Also, they only affect our overhead if we get the job. Raising our license fees is quite another matter as we are in more difficult times now than even the last two years. Just like the BC government--net zero and zero on our			X		From what we hear from employees that have worked for some of our competitors, there are contractors that never pull permits unless they need a hydro connection or if they do, the	The contractor and FSR fees need to stay the same. I don't see any rational to raising them. The permit fees should be able to sustain the overhead at this time. If the Safety Authority has to tighten their belt--welcome to the club.	

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Sugges tions
	overhead must be respected until we at least hit bottom--let alone start to move back to profitability.					workmanship is so bad they don't call for inspections until the mess is covered.		
Somewhat acceptable	it is OK if there are more tech talks!! we need them & I like to go to them it is the only way to keep on top new code and product.		X			see above	no, so long as just what you said.	
Acceptable	Good Service costs money, like everything.		X			It is important to be up to date and the exchange of experience.	Not at the moment.	Not at the moment.

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Sugges tions
Not acceptable	Fees for permits is one thing, but increasing education, recertification and testing is another.		X			Specifically; when certain changes in rules and codes are made, BCSA should be making it clear to everyone involved. Whatever you are doing now isn't working. If bosses don't fill employees in, or employees don't utilise the web, it makes it hard to keep up with codes.	Nobody likes fees. If all qualified trades aren't paying the same fees, it isn't fair.	
not acceptable	In the 60,70 80,90 we had up to 6 Electrical inspectors in PG area and the Fees were one quarter of what we pay now, with 2 inspectors. Where are the fees going?			X		More Inspectors	All of the fees are to high	

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
not acceptable	I feel the fees charged by BCSA at this time are significant and the return value added minimal.	X		X		BCSA should focus on the proper controls to ensure the safety of the majority of the public. There is no way they will ever eliminate 100% of the incidents nor should there be any need for that to be their target. Go with the 80/20 rule.	The alternative safety approach is very cost prohibitive. While this is not an easy program to develop and manage, there is a lot of duplication of effort and the management infrastructure is huge and continuing to grow.	I have heard several times that the safety authority rates are what they are because they are a neutral income organization and they are only covering their costs. Problem is there is little or no control on their costs. The recent safety manager position, offering base salaries of well over \$400,000 per year plus expenses is ridiculous when the average safety officer is less than \$100,000.
acceptable	its a reasonable increase		X	X		i would like to see more safety officers directed at refrigeration	no	

Overall	Explanation	Assessment Evaluation & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Sugges tions
somewhat acceptable	<p>Anyone who can afford \$200 per square foot to build a new home should have an increased fee of at least 3%.</p> <p>However I feel very strongly that BCSA must lower amounts for electrical permits on small projects where people get more than 10% of their electrical invoice as permit fees. These proportionally high fees will lead to people doing their own un-permitted work as they have little funds and they may feel the risk is worth the gains.</p>				Better distribution of permit cost to installation value	see above Q1	See Above Q1	see Above Q1

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Sugges tions
not acceptable	None of this increase is intended to go towards the hiring of additional inspection officers. Let's call it like it is, we're talking a 9% increase by 2014, while associated revenues of your clients are unlikely to raise by the same %, just to be somewhat able to keep up with rising rates imposed by so many Provincial entities. We're getting increased to death out here!!				More inspectors to do the job.	It's been explained in Question 1, but currently BCSA inspection personnel are stretched so thin, it is impossible to know how they're somewhat able to keep on top of the many pressures & stressors associated with a limited workforce with so many critical safety demands & expectations.	Yes, perhaps 3% in 2012; 2% in 2013 & 1% in 2014 would be more prudent an increase?	

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions	
Not acceptable	As the electrical division bears the brunt of the financial support for the other safety divisions, the other divisions requiring greater supervision/inspections should bear their appropriate portion which may mean higher costs to them. As we are in tighter financial times, watching our own costs closely, we expect the same from our associates.	X	X		X		The online electrical permit system has been working very well for us.	Home owners complain about the cost of permit fees in relation to the price on small jobs.	
Acceptable	I particularly like the reduced fee to re & re a cook range	X	X	X	X		Keep following up as you are presently doing	The Hi Rate as per commercial appliance rather than as per job For example, if you put in two overhead heaters you must double the permit, which is a terrible cost	No

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions	
Not acceptable	We don't see any improvement in service from the BCSA now and haven't over the years, it has declined. Responses to phone calls or emails to the elevator department can take weeks at times and I don't think ever in less than 3 or 4 days. Unless we can see an improvement in service the increases are not warranted.	X	X	X		As an MR license holder the SA needs to be more responsive on education and support.	The SA authority has gone to a more punitive approach. They need to be more helpful with MR license holders and end user/owners to ensure the obligations are being met and that answers to questions are timely.	The current fee structure is okay except the fee per hour to review documents. Increases are a problem without results.	The SA needs to take a less punitive approach.

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions	
Acceptable	Seems to be inline with expected yearly increases. City of Kelowna has taken a significant increase of over 50%...so this is 'public' fair for safety issues.	X	X	X	X	Small brochure produced for general public that capsules 'why' they need permits!	In the industry, it seems that Gas-fired appliance permits (maybe all others too) seem distant from the regulations that govern the gasfitters when it comes to domestic appliances - whether installation, re & re of gas-fired equipment, or general knowledge prior to purchasing and/or replacing gas-fired equipment. As an example, someone goes to an appliance dealer to purchase a gas range. Salespersons are not generally informed of the	Specifically to the Gas Contractor licensing fee seems to be just fine.	See Q. 3 - working to get those who think there is little value in studying, writing the examinations, passing to qualify....out of the industry. They put the public at risk and the public thinks they are getting 'value' when they price compare!!!

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions	
somewhat acceptable	I think it is important to have a good service level and adequate IT abilities. However, budgets are very tight and any increase in operating costs can be difficult to deal with.	X	X	X	X		All these topics are the reason BC Safety exists and far as I am concerned and I would hope they are all being done at a reasonable level.	This is a difficult question to answer! If the organization I work for could spend less money on vessel permits each year that would be great. You are collecting money for a piece of equipment that does not change from year to year. That being said, I think it is important to be in compliance when it comes to pressure vessels and there is a certain infrastructure that is needed for this to happen.	
somewhat acceptable	There is constant rising costs in the electrical trade as the cost to sell decreases. We are under constant pressure to lower prices. This doesn't help.		X				The more communication and training there is the better. Maybe a call center for basic electrical clarifications or questions instead of bothering the	Licensing fee should remain the same. AS a small business owner there are enough rising costs....insurance, etc...	

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Sugges tions
						inspectors.		
Acceptabl e	With the fee freeze for 4 years, it seems only natural for an increase at this time.	X	X	X	X			
Acceptabl e		X	X	X	X			
Not acceptable	The only part of the proposal I feel is unacceptable is the proposed homeowner permit fees. Most homeowners are unwilling to pay high fees so the work goes uninspected, if the homeowner calls a certified tradesperson to complete the more technical aspect of the installation the tradesperson has a moral dilemma. If they refuse to do the work without pulling a permit the homeowner	X		X	X	I feel BCSA should strive to work in partnership with local colleges rather than competing with them. Colleges that have applicable trainers should be the first line of trades upgrading. Let the instructors instruct and inspectors	Please see my earlier comment regarding homeowner permit fees.	I would like to know the process involved that resulted in the approval of ASTTBC members to draw permits.

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Sugges tions
	will look for someone less qualified to complete the installation and put an uninspected installation into use, or they can complete the installation under the table and risk putting their own FSR at risk in order to avoid turning their back on a potentially unsafe installation.					inspect!		
Acceptabl e		X	X	X	X		None	None
Acceptabl e	Chevron Canada Limited considers the proposed fee increases as acceptable.	X	X		X	Assessment - Continue performing audits as is currently implemented Outreach - Continue to share information via	No, there are not any specific fees that are unreasonable or problematic.	Suggest to in the future, share Chevron sponsored training on site with BCSA Officers if applicable. Develop succession plan when the current Safety Officer Don Bishop retires.

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Sugges tions
						internet. Enforcement - Enforce all sites are maintaining sustained compliance with safety legislation.		
Somewhat acceptable	It is fair to say that all safety authorities across Canada should all be at par with each other. All pensions and wages of safety officers should be the same across Canada.	X	X	X	X	These four are what I know exist today .The research part is lagging as products come from other countries in big numbers...	Fees should go back to minimum \$500 value for work	
not acceptable	Salaries too high			X		Enforcement	Overpaying staff. Obviously if you run a deficit you're spending too much, reduce salaries instead of charging more!	

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Sugges tions
Somewhat acceptable	It should be based on inflation and a limited growth margin. This appears to be an arbitrary number with no explanation of its financial basis. As the Box says please explain yourself, how many \$ deficit?, how long to pay it off? how much do you expect to spend to serve us better? Is this for wage increases as well and if so what % ? what do you foresee in future years for increases? Tell the whole truth we can handle it, we have bad years too.	X	X					

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Sugges tions
acceptable	It is important that BC Safety Authority has the funding to enable it to cover it's mandate. That being said I am assuming that the Authority is being operated in a business like manner.	X	X	X	X		No	
						It has been encouraging to see inspectors enforcing the regulations. Education in the how and why of these enforcement(s) is important also. There are many changes in technologies happening now and it is important to keep abreast of these.		

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
somewhat acceptable	We feel that some increase is reasonable, however on the single family aspect of gas permits the current \$98 fee is still too high and this should be lowered rather than increased. As an alternative have a lower price for ALL replacements appliances. We are happy to see Ranges and Dryers as replacements being \$30.00. The two main reasons we feel that the \$98 fee should be lowered is this represents an ongoing burden to homeowners and there is seldom any actual site inspection. Not that we recommend increasing your costs by having full inspections but rather lowered the permit cost to reflect the current economic	X	X	X		The techtalk programs are great.	Replacement fees for single family being the same as a new installation when there is usually a lot less work involved.	We are happy to see the proposed Ranges and Dryers as replacements being \$30.00, however would like to see this include all residential appliances as well, boilers, furnaces, fireplaces, patio heaters.

Overall	Explanation	Assessment Education & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Sugges tions
	situation we presently live under.							
Not acceptable	Fees are already indexed. They rise with labor and material costs. BCSA requires money to fund self-aggrandizement of the organization and repeated dubious spending on computer up-grades.	X	X			The public links permit fees with inspections. They get this opinion from the previous Ministry, from municipal inspections, both electrical and other.	<u>Re-inspection fees.</u> You have no policy on when these fees are charged. They should not be applied to minor deficiencies with limited safety risk. They should not be applied for a rough wire when compliance could be checked on a final. They should not be charged when no inspection is done.	I think that it is disingenuous to have this consultation process without involving the end user who actually pay the fees. They are unaware of the actions of the BCSA until they find that they paid a permit fee and don't see anything for the money.

Overall	Explanation	Assessment Evaluation & Outreach	Research	Enforcement	Other	Explanation	Problematic or unreasonable fees	Comments/Questions/Sugges tions
							They should be used as a tool to ensure safety. They should not be used to pad your bottom line.	

Transcripts from emails received

Note: The Overall category rating in red means the comments have been interpreted to be positive or negative. The individual did not place the rating.

Overall	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
POS	Have no problem with your proposed fee increases. There has been no Increases for several years. Increase will just b passed on to homeowner.		U do a great job keeping everyone safe!
NEG	At this time when so many employees of private and government industries have been asked to accept a zero wage increase, should you not do the same. Thanks		

Overall	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
<p>POS</p>	<p>We do not have any valid reason to argue for fee increases. As costs increase, a minimal increase as proposed is probably necessary for the B.C. Safety Authority to continue providing services as they have been in the past.</p>	<p>Two issues with the fee structure that we would like to have reviewed are:</p> <ol style="list-style-type: none"> 1. The rate structure as it is applied to on-line permits. We appreciate that a substantial amount of money has been put into the online permit system and as well to maintain that same system. However, those who use the system have never seen the benefit of it in terms of cost savings and we would venture to guess that if the system is used by 30% - 40% of the contractors who apply for permits that there would be a considerable cost savings to the BC Safety Authority in terms of personnel to staff the offices, etc. 2. At times the real costs of the BC Safety Authority processing paperwork for permits issued are not borne by us the users. I know, by now you're questioning if this is a sane contractor or not. Yes, I am perfectly sane and would like to see a cost applied to permit extensions after 6 months. The reasons for suggesting these are as follows: <ol style="list-style-type: none"> A. The BC Safety Authority personnel spend additional time to deal with the processing of paperwork for permit extensions that has a real dollar cost attached to it. B. The contractors, should they be aware of a real cost being added after six months, will be more inclined to complete a permit rather than having to pay an additional cost that they would not be able to pass along. C. Under the present system an installation that has been declared unsafe 	

Overall	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
		<p>could carry on for years under the same permit without additional cost to process the declarations and paperwork on the BC Safety Authorities end of business. The following is an example of where this additional cost could and should probably be added:</p> <p>We were called in to correct code violations to 16 power kiosks. We applied and paid for the permits and completed some work on them to bring them to minimum safety standard but the work could not be signed off as being completed because the inspector asked for the power kiosks to be replaced. The strata council has delayed the project for almost two full years with the replacement of one power kiosk being awarded to another contractor. Meanwhile we have sent in “work is safe” declarations for each power kiosk four times, 64 declarations in all, and have not had to pay extra for any of that paperwork to be processed. Why is that? Why not charge an additional \$35.00 - \$40.00 per permit extension when the project has no beginning or end in site? This would encourage the owner/ strata council or those responsible to move the project forward to carry on in a responsible manner and as well cover some of the costs incurred by the BC Safety Authority.</p>	

Overall	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
NEG	<p>thank-you for the opportunity to express my opinion on subject while i am not opposed to user pay model (and reducing general taxation) for selected non-core government services, one would expect as fees have increased dramatically in the past decade at least services would remain level of improve. My perception is service levels have declined ... that extends to organisations like ITA which affect industry.</p> <p>Increases of 3% on large provincial government funded organization with years of budget cuts, zero increases and/or increases at less than the rate of industry inflation levels are a real hardship in my opinion.</p>		

Overall	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
POS			<p>Although I understand the need to raise fee's , and the raise is not that substantial, I do see one flaw in your proposal. Homeowner permits need to be raised substantially higher, and the owners must fill the application in on Government agent sites, as to not allow them to have Joe Blow help them fill it out. There is a great number of Homeowners who consistently get themselves in trouble, and then we are called in and expected to work miracles but they are not willing to pay our justified rate for the time and effort we as contractors put in to stay current with our trade. A large majority of the Safety Officers time is spent with Homeowners these days, Make them pay dearly, or have a Knowledgeable, Qualified Electrical Contractor do the work.</p>

Overall	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
POS	<p>Thank you for the chance to review the proposed increase in BCSA fees. I also appreciated meeting with Catherine and Erik who outlined the reasons for the increases and were willing to take into account the concerns expressed by my members.</p> <p>BCSA has made efforts to keep down its fees to our members. BCSA fees have been frozen for a number of years in recognition of the difficult economic times the industry was going through. That has not gone unnoticed and on behalf of the industry ICBA would like to thank BCSA for it.</p> <p>The industry understands the need for a rate increase now. It does think that the 3% weighted average you have proposed is reasonable for 2012 and 2013.</p>		<p>We would ask that you consider holding the 2014 increase to the equivalent of the cost of living. If an increase above the cost of living is required in 2014, would we ask you engage in some consultation before its implementation.</p> <p>Again, thanks to the BCSA for its good work.</p>
POS	Fine with me		
POS	I think your proposed increase rate is reasonable in keeping with the times		
Acceptable	The increases appear fair and reasonable, considering it has been a number of years since the last increase.	None	

Overall	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
NEG	Dear Rate administrator; The proposed fee increase, which may be required to maintain services at some performance level will be very difficult for Condo and Apartment Strata owners. The rate of inflation maximum, while still high, would be a better cap. This year 2.4%		
NEUT		On multicar banks of elevators initial acceptance tests are typically performed per car at the prevailing rates. At the end of the job a final group inspection of fire service and emergency power is usually conducted for all cars in a bank or building. There should be one flat fee rate for this type of inspection, rather than another fee per car charged for this type of group function inspection.	
NEG	In my opinion you collect to much money now		
POS	i think the fee increases are fair.	need to address fee cost for small jobs. jobs under \$300 should have a no fee charge. not having this drives to much work to the black market.	

Overall	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
NEG	<p>As most people have had a wage increase of 0, 0 and 0 for the last 10 years or so, I'm not sure how they are to keep up with the increase in every fee imaginable.</p> <p>Also, the public knows that although they, or the contractor may take out a permit, the chances of actually seeing an inspector is next to nil.</p> <p>I think when the public hears there is an increase in fees, even more will not take out a permit overall safety will go down. We won't see the results for a few years.</p> <p>People need to cut corners when they can't afford it.</p> <p>just my opinion</p>		
NEG	<p>In light of the current economy and the lack of employment for the trades I think fee increases would be a bad idea.</p>		
NEUT			<p>Having printed the information last night, you need a magnifying glass to read the material. I have excellent eyes, and in this age of computers I know that the format for this document could be changed in a heart beat. Looking forward to an enhanced readable version.</p>
NEG	<p>Why is it the government keeps telling us that inflation is below 2%, meanwhile you a—holes are increasing fees by 3%. ?</p>		

Overall	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
POS	I have read through your proposed fee increases and they do not seem out of line. I would have no objections to these increases		
POS	We are of course in favor of fair fees for everyone and we know what it is like to operate in a deficit.		Perhaps we can convince the government to be more frugal with our existing fees, or yes make increases, as our economy recovers. We would like to increase our fees as well annually, but that only louses business for us and as it is we need more business and operate more efficiently to stay in business. My fear is that with increased fees more companies will be doing work without permits, more than the existing ones now that do not take out permits. If it means a fee increase to police these people I am all for it but lets do the policing before some one gets hurt and put everyone on the same playing field.
POS	I think the proposed fee increases are reasonable.		
POS	It is expected to have an increase in fees		but I would like to see that more officers are available in the field to deal with contractors that use unqualified workers.
NEG		We do class "H" elevating only. It is our recent experience that increases in freight and cost of product are having a negative effect on disabled person's ability to have access to the same services the rest of us take for granted. It is not in the best interest of the disabled community to have fees for obtaining permits and inspections go up as well.	

Overall	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
POS	<p>The fee increase seems reasonable. With increases in cost all over the industry you must stay competitive.</p> <p>Thanks for the good service.</p>		
NEG	<p>I am a representative of Nanaimo Forest Products Ltd, the owner of the Harmac pulp mill in Nanaimo. We currently pay \$35,000 per year in fees to the BC Safety Authority. We cannot support the proposed 3% per year increases to our permit fees for each of the next three years. These increases would be well above the forecast rate of inflation in the consumer price index. The real GDP for the period from 2011 to 2015 is forecast by TD Economics (April 16, 2012 forecast) to be 2.5, 2.2, 2.4, 2.2 and 2.1%. The core CPI is forecast at 1.7, 1.9, 2.0, 2.0, 1.8 by TD Economics for the same period.</p> <p>BC Safety Authority is “the province’s delegated authority” over the areas that it has jurisdiction. As such, it has a monopoly over this business and it’s customers cannot simply choose a different supplier in response to pricing pressure. The BC Safety Authority is a “non-profit”, but it also has an obligation to the public and it’s customers to provide that service for the best practical value. Building in future price increases in excess of economic growth places an undue hardship on the organizations captive customers.</p> <p>Our business is producing a commodity product that has global customers that can</p>		

Overall	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
	<p>choose to purchase from many different suppliers located in a wide variety of geographic and economic locations. We cannot expect to pass on inflationary cost pressures to our customers in the present market conditions. Therefore production cost increases that are excessive will negatively impact the viability of our business and businesses like ours. This is not in the best interest of our regional economy or the stated interest of our provincial and national governments. I therefore urge you and your Board of Directors to carefully consider all proposed price increased in this context.</p>		
NEG		[Boiler exam] fees are already ridiculous, why make it worse on people trying to better themselves?	

Overall	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
NEUT			<p>I have previously submitted a proposal on this matter to consider a level of limited “No-Fee” contractor permits for the very bottom end of the market. I might be the only contractor in the province who will not do work for small customers without a permit, but that does not make it right that customers and apprentices have been brainwashed by their employers to think that permits and inspection are not relevant at the small end of the market. I believe that if there is a true interest to re-educate the customer to respect the electrical permit process, we have to show that for very small jobs that a permit will not add to the cost of the job. It should be one time per year, per customer address, and the contractor must document with digital pictures the before and after. (IE; before and after the addition of a ceiling outlet for a ceiling fan, etc.) No-Fee permits should still require declarations that the work performed has been done to code. Think about it.</p>
NEG	<p>I am opposed to any fee increase over the next 3-4 years, we are not done with the downturn in the economy. Personally our company in 2011 did less than 50% of the business we did in 2008, and with the probable election of the NDP provincially for the next term I cannot see things improving, in fact the economy will most likely swing down lower than what it is. Again I am opposed.</p>		

Overall	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
NEUT	Having just paid \$185 for my new Code Book and \$130 for my contractor's license renewal I have some issues with a fee increase. On the other hand if a 4 litre jug of milk costs \$4.50 then your proposal is not unreasonable is it?		I have a suggestion. I like to stay current on code changes and trade issues and I have thoroughly enjoyed the 2 Tech Talks that have been available to me. I have a very busy life outside of my business and trying to fit a code course in for 2 months of Tuesday and Thursday evenings just won't happen. Why couldn't you either put together an online code course and charge a decent fee or have a regular bi-weekly tech talk for a reasonable fee. Income, dissemination of information, face-to-face discussion of trade issues. Thoughts?
NEG	In the 50 years I have watch and been utilizing the Safety inspections services under the various division names, I feel the current situation has created a huge uncontrolled bureaucracy with most inspectors within 12 years of retirement which now adds to the high burden costs. 60,000 inspections per year is not a heavy burden considering the number of inspectors in the various positions and the number of working days per year when shifts are preformed.		Might I suggest GPS systems be installed in safety authority supplied vehicles which would verify the efficiency of this division. What are the costs of the in house lawyer and head accountant I believe it is an unnecessary luxury in building up the authority bureaucracy as you operated find without their services, every time you create a new division they set up a new employee empire to surround them as assistants. I believe that serious belt tightening from top management down would negate the need to increase fees and possibly reduce the overhead which would allow a buffer fund for emergencies .
NEUT	Hi i would say /.3 is fair subject to after 2014 no more incears at least until 2020 .		

Overall	Explanation	Problematic or unreasonable fees	Comments/Questions/Suggestions
NEG	I find it hard to believe that fee increases are even considered when the economy is in the tank we are told to tow the line don't you think that government should set an example by holding the prices until the economy warrants increases again.		
NEG	I suggest that you forward this to Adrian Dix for his comments as he will have a more in-depth comment than me		
NEG	I would love to be able to agree to a fee increase but I cannot. I do not have the luxury of raising an extra 3-5% to my income. When I need to purchase something in the future I save ahead for it.		