

## Mandatory Documentation of Variances

### Summary

This bulletin clarifies documentation requirements for variances under the *Safety Codes Act*. It applies to all accredited organizations and safety codes officers, ensuring consistent compliance and record-keeping across disciplines.

### Background

Under the *Safety Codes Act*, safety codes officers may issue a written variance if they believe that the proposed design provides **approximately equal or greater safety performance** to the prescriptive requirements and objectives provided for by the applicable code, regulation, or body of rules in force.

All quality management plans/quality management systems (QMP/QMS) require supporting documentation demonstrating the equivalency. All variances must also comply with discipline-specific codes.

- Codes in the **building, fire, and plumbing disciplines** enable non-prescriptive ways to meet the code requirements, which they call alternative solutions (that is, an alternative to the acceptable solution prescribed by the code). These codes have **mandatory** documentation requirements for alternative solutions in Division C, Section 2.3.1.
- Codes in the **electrical, gas and private sewage disciplines** do not have equivalent mandatory requirements. However, the documentation requirement in the QMP/QMS applies, and following Division C, 2.3.1 of the building, fire or plumbing code **in principle** is considered best practice for due diligence and to ensure good faith protections when assessing variance applications.

### Required Action

When issuing variances, safety codes officers must follow the documentation requirements described below.

- **Building, fire, and plumbing:** Document alternative solutions as required by Division C of the applicable code.
- **Electrical, gas, and private sewage:** Provide documentation showing equivalency as required by the QMP/QMS in your jurisdiction.
- **All disciplines:**
  - Submit a copy of each variance to the Safety Codes Council within 10 days of issuance.
  - Retain all supporting documentation and make it available upon request by an Administrator.
  - Maintain records in accordance with the approved QMP/QMS for the accredited organization.
  - Cooperate with compliance reviews and audits.

**All accredited organizations** must ensure that the safety codes officers they employ follow the procedures. Non-compliance may result in enforcement actions, including suspension or cancellation of accreditation or designation.

## Resources and Support

For guidance on documentation or understanding obligations under the *Safety Codes Act*, contact:

- **Accreditation** – [accreditation@safetycodes.ab.ca](mailto:accreditation@safetycodes.ab.ca)
- **Certification** – [certification@safetycodes.ab.ca](mailto:certification@safetycodes.ab.ca)

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