

The primary issues of concern at this point in time seem to be regarding the fees, mechanics and TSSA inspections. This article attempts to address those concerns but is not all encompassing of TSSA and your responsibilities. TSSA will be presenting at the OCA seminar in January and therefore you are invited to come and ask questions. One of the first questions that is being asked is "What is this going to cost me?". Here is a summary of the fees associated with operating an amusement device in Ontario:

1. Operating License:

The license required to operate an amusement device is linked to you, the operator/owner of the camp/facility. Provided you have a mechanic (to be discussed later in more detail) for the device, you could operate other types of amusement devices with this license, such as waterslides or inflatables. Operating licenses renew annually on May 31st and cost \$318.00.

2. Device Permits:

Permits are associated with the device and therefore you could sell the device and the permit could be transferred to the new owner. Permits for most amusement devices expire March 31st of each year. Seasonal devices such as inflatables and zip lines expire on May 31st. Permits renew annually on May 31st and cost \$210.00. You will be sent a renewal invoice approximately two months prior to the expiry date.

3. Inspection

All new amusement devices, other than the zip lines with variances, require Initial Inspections before the device is used by the public. The initial inspection would occur after the technical dossier had been reviewed by TSSA Engineering but before the permit is issued. If the device passed the Initial Inspection, a permit would be issued and the operator would be able to use his/her ride. Subsequently, Periodic Inspections occur annually upon renewal of the permit.

In the case of camps with variances, the process has been modified such that Initial Inspection has been replaced with an Audit Inspection, and no technical dossier was required. Instead the device was 'grandfathered' and pertinent information was gathered via an Audit Inspection. Regardless of what it is called or its purpose: Initial, Periodic, or 2013 Audit Inspections are a minimum fee of \$150 dollars per device. This fee includes the travel time and one half hour of inspection time. Additional inspection time beyond a half hour is billed in quarter hour increments at a rate of \$145.00/hour.

Effective in 2014, camps with a license, permit, a completed audit inspection will be responsible to book their periodic inspection for their devices when their permit expires. Periodic inspections need to occur in order to renew your permit. Please note you need to contact your inspector in the spring of 2014 and arrange a date and time for your first periodic inspection.

4. Engineering

Technical dossiers (submissions) and the engineering review for new amusement devices are not required for zip lines in camps that have a variance. However, if the design is changed in any fashion *that affects its inherent safety* (even if for the better), then the design change must be submitted to TSSA and is subject to review and inspection, regardless of whether the zip line was grandfathered via variance or not.

Camps that have never had an approved variance are required to complete the technical dossier/design review process that is outlined in detail on our website (www.tssa.org). For the sake of this communication

we will not go into this process in too much depth at this point but there are costs associated with this process. TSSA can provide you with a list of names of local engineers in addition to those you may know who complete these types of submissions regularly. The submission completed by that engineer is sent to TSSA and the Elevating and Amusement Devices (EDAD) Engineering department reviews the submission at a rate of \$160.00/hour. Complete and concise submissions can be reviewed in an hour, however it really depends on the complexity of the device and/or alteration as well as the accuracy and completeness of the design submission.

Annual Fee Summary:

As an example, if you own a single device (zip line¹), and your TSSA inspection takes two hours, the total fee associated with this device for one year is \$895.50. This is a sum of \$318.00 (license) + \$210.00 (permit) + \$367.50 (periodic inspection).

If you operate a zip line and a waterslide for example, the sum of the fees associated with these two devices would be as follows, assuming the inspector was at each device for two hours: \$1473.00 = \$318.00 (license) + \$210.00 (permit for zip line) + \$210.00 (permit for waterslide) + \$150.00 + 1.5*\$145.00 (inspection fee for zip line) + \$150.00+1.5*\$145.00 (inspection fee for waterslide).

Please note that for the example provided above, two hours per device was assumed, however this is not a fixed number. The inspection time depends on the complexity of the device, the general condition and availability of the documents and associated equipment. The more prepared and organized your device, employees, site, and your documents are, the more efficient your inspection will be. It is also a good policy to book your device after you have done any spring cleaning and maintenance such that the device is essentially ready to go - this minimizes the directions that need to be written and the time spent at the device.

Current and Future Obligations:

In 2012, camps with a variance were sent a letter notifying them of the requirement to obtain an operating license. In 2013, another letter was sent to camps with variances to notify them that TSSA will be conducting audit inspections in 2013. The audit inspection is billable, and when it is over if the owner has obtained their license as instructed in 2012, they will be issued a permit for the device that expires May 31, 2014. The \$210.00 permit fee will be waived this year. The audit inspection was billed at the rates defined in the fee schedule described previously.

In the amusement device industry, it is understood by licensed operators that the responsibility lies with them to contact their TSSA Inspector and book the initial or periodic inspection. For the camp industry, since this was a phased in approach, the names and locations of the camps/facilities with variances were given to the inspector closest to the camp location. He or she was instructed to contact the person we had on file to set up the audit inspection at a mutually agreeable time. The intention of this was to minimize confusion with respect to finding your inspector or knowing who to contact.

For your information, TSSA Elevating and Amusement Device Inspectors have assigned regions based on postal codes and their contact information is available on our website. In the case of zip lines or other unique devices, the person assigned to you by postal code may not be the person who does that specific type of device and therefore they may redirect you to a different inspector. The thing to take away from this is that the inspector that contacted you this summer to set up the audit inspection is the person you should contact next year for your periodic inspection.

Mechanic Vs. TSSA Inspector Responsibilities

For the safety of all Ontarians, anyone who wishes to operate an amusement device in Ontario must employ a mechanic with the proper training to maintain the devices they operate. Mechanics are granted licenses by TSSA based on experience and they must pass an exam. The mechanic is responsible for the maintenance required to ensure the device and all safety features are in good working order. Due to the broad range of devices regulated, the need for endorsements came about: a person who operates inflatables does not require the same skills/training as a person who maintains a roller coaster or an adventure park. This is why in the previous section regarding fees, it was mentioned that a person who has an operating license as well as a mechanic with the correct endorsement could also operate a waterslide, but not with a mechanic who only has a zip line endorsement. The mechanic would need a waterslide endorsement or the licensee would need second mechanic on contract.

It is also generally accepted that not all devices require the same level and frequency of maintenance. A trailer mounted ride for example, that spends an entire season bouncing down the Trans-Canada highway will require more aggressive ongoing maintenance than a waterslide in a hotel. Therefore the relationship between the client and the mechanic depends on the type of device and is ultimately at the discretion and comfort level of the mechanic who is responsible because his/her license depends on it. Some devices can be maintained seasonally and a mechanic is only required if daily inspections yield a concern or deficiency in which case the mechanic is called to the site to address the issue. Mechanics turn wrenches and climb structures; they use their experience to make decisions regarding equipment replacement and criteria and ultimately have responsibility for the safety of their device.

TSSA Inspectors are also accountable to the public of Ontario for their safety but their inspection is more of a broad inspection that includes structures, equipment, function, operations, training, maintenance and incident reporting. The two roles are not interchangeable and the TSSA inspection does not relieve an operator of their obligation to maintain their device, nor does a mechanic complete the role of the TSSA inspector.

As an amusement device operator you are now responsible to ensure that your device is maintained by a competent person with a TSSA mechanic designation (and a zip line endorsement). The competent persons you have known and worked with thus far, are to the best of our knowledge, willing to write the exam and therefore you should be able to maintain the relationship you already have established with your current challenge course professional. An affiliation with ACCT is no longer necessary although is considered an asset and therefore non-ACCT members with the required amount of hands-on experience are also welcome to apply to write the mechanic's exam. Camp employees with the required amount of hands-on experience could also write the exam if the experience can be validated.

Make note of your questions for the January conference and TSSA will be there to address them.

ⁱ Groups of zip lines of the same design, installed in parallel and that share the same start platform and terminate on the same landing platform can be classified as a single device and can be included under one permit.