Formal Interpretations/ Interprétation formelle

This section lists questions that individuals have submitted about a particular standard. Each question has been reviewed and answered by the appropriate committee. If you would like to submit a question about a particular standard, please see the end notes in the preface of that standard.

Posted November 10, 2016

The following interpretation regarding CSA Standard C282-15, Clause 7.3.10, *Emergency electrical power supply for buildings*, has been approved by the JB108 TC on Emergency Electrical Power Supply for Buildings (C282).

Question: If a generator auxiliary tank has sufficient capacity on its own to meet all other requirements of C282 including considerations for fuel temperature and location of return fuel, is it permissible for the main tank to supply other non-generator appliances given that the main tank and associated transfer system to the generator auxiliary tank are not required to meet minimum fuel quantities?

Answer: Yes, provided that the auxiliary supply tank meets all applicable requirements of Clause 7.3.8, and that the main supply tank described in Clause 7.3.10 is not required to meet provisions of Clause 7.3.8.

Posted October 5, 2016

The following interpretation regarding CSA Standard CAN/CSA-ISO 14001:16, *Environmental management systems — Requirements with guidance for use (ISO 14001:2015*), has been approved by the Members of the CSA Standards Technical Committee on Environment / Harmonized with SMC to ISO TC 207:

Question: ISO 14001:2015 has a very different structure than the two previous versions. Our documentation is aligned to the clauses that existed in the previous version. Do we have to restructure our documentation to follow the new clause structure?

Answer: No. Clause A.2 states: “The clause structure and some of the terminology of this International Standard have been changed to improve alignment with other management systems standards. There is, however, no requirement in this International Standard for its clause structure or terminology to be applied to an organization’s environmental management system documentation.”

Question: Does the term "compliance obligation" in ISO 14001:2015 have the same meaning as the phrase "legal requirements and other requirements to which the organization subscribes" in the previous edition?

Answer: Yes. Clause A.3 states: "The phrase '*compliance obligations'* replaces the phrase '*legal requirements and other requirements to which the organization subscribes*' used in prior editions of this International Standard. The intent of this new phrase does not differ from that of the previous edition."

Question: Are the references to other standards in the Notes to Entry in Clause 3 (terms and definitions) normative?

Answer: No. A normative reference is a reference to another document that is indispensable for the application of the standard. If a document is normatively referenced, an organization must conform to it in order to conform with the standard. As Clause 2 states, there are no normative references in ISO 14001:2015.
ISO 14001 is a standalone document that can be applied without reference to any other documents.
While "Notes to Entry" in Clause 3 (Terms and Definitions) are normative, references to other standards in those Notes to Entry are informative only.
For example, Notes 3 and 4 to Entry 3.2.10 ("risk") refer to definitions of "events", "consequences" and "likelihood" in ISO Guide 73:2009. Note 4 to Entry 3.4.1 ("audit") refers to definitions of "audit evidence" and "audit criteria" in ISO 19011:2011.
These references to other standards are provided for information only. There is no need to purchase additional standards. Furthermore, anyone interested in the terms and definitions in other ISO standards can preview elements of these standards on the ISO Online Browsing Platform (OBP) at no charge, including the Foreword, Introduction, Scope, Normative references and Terms and Definitions.
Access is enabled by visiting the ISO site at https://www.iso.org/obp/ui.

Question: My organization's EMS does not fulfill ISO 14001:2015's requirements for outsourced processes because my organization has no outsourced processes. Does this preclude my organization from claiming conformity to ISO 14001:2015?

Answer: No. Clause 1 of ISO 14001:2015 states that an organization may not claim conformity to the Standard unless all the requirements of the Standard are incorporated into the EMS and fulfilled without exclusion, but some of the Standard's requirements are applicable only if certain preconditions are met. If those preconditions are not met, the requirements do not apply and the organization can claim conformity to the Standard even though it does not fulfill those inapplicable requirements.
In the case of outsourced processes, an organization must establish a process (per Clause 8.1) to determine if it has any outsourced processes. If it has no outsourced processes, the further requirements of the Standard that apply to outsourced processes are not applicable. If, however, it does have one or more outsourced process, all the requirements that apply to outsourced processes apply to each of those processes and must be fulfilled for the organization to claim conformity to the standard.

Question: There appears to be ambiguity in ISO 14001:2015 regarding whether the term "risk" has only a negative connotation or includes both negative and positive connotations. The definition of "risk" (3.2.10) states that risk can be positive or negative, but the definition of "risks and opportunities"(3.2.11) implies that risk is only negative, while opportunities are positive. May an organization decide for itself whether to use the term "risk" in its Environmental Management System as a solely negative concept or as both a negative and positive concept?

Answer: Yes. ISO 14001:2015 requires an organization to identify and address both the potential adverse and the potential beneficial effects of uncertainty, but the organization may decide for itself what terminology it will use to capture these concepts. Each organization may decide for itself whether to use the term "risk" to capture potential adverse effects of uncertainty and the term "opportunities" to capture potential positive effects of uncertainty, or to use the term "risk" to encompass both potential negative and positive effects of uncertainty. As Annex A.2 states, there is no requirement to apply the terminology used in the standard to the organization's EMS documentation, or to replace the terms used by the organization with the terms used in the standard. In deciding what terms to use, organizations should be aware that although the definitions of "risk" (3.2.10) and "risks and opportunities" (3.2.11) take different approaches to the concept of risk, only the term "risks and opportunities" is used in the clauses of the standard that contain requirements

Question: Are there any situations in which "top management" refers to persons outside the scope of the environmental management system?

Answer: No. Top management is defined in relation to the scope of the EMS. If the EMS covers the entire organization, top management is the person or people who direct and control the entire organization. If the EMS covers only part of an organization, top management is the person or people who direct and control that part of the organization. Note 2 to Entry in the definition of top management (3.1.5) is intended to clarify this point, but the phrase "the scope of the management system" in that Note to Entry might lead to some confusion. This phrase means the scope of the *environmental* management system. It should not be misunderstood as a reference to an organization's generic management system, quality management system or some other discipline-specific management system. It is not intended to broaden the scope of the EMS beyond what the organization has established or to extend the scope of the internal audit beyond the scope of the EMS.

Question: Does the requirement for internal audit (9.2) include a compliance or financial audit?

Answer: No. The internal audit provides information about whether the EMS conforms to the requirements of the Standard and the organization's own requirements for its EMS (9.2.1). The organization determines which requirements beyond those of the Standard itself are EMS requirements, and will thus be included in the scope of the internal audit. The internal audit is not a financial audit, a compliance audit, or an audit of conformity

with interested parties' needs and expectations. The Standard's new definition of nonconformity (3.4.3) clarifies this by stating in Note 1 to Entry that nonconformity does not mean non-fulfilment of any and all requirements, it only means non-fulfilment of the requirements of the Standard and additional EMS requirements the organization establishes for itself. There is no change from the previous edition of the Standard in this respect.

Question: In Note 1 to Entry 3.3.4 "outsource," does the phrase "outside the scope of the management system" mean "outside the scope of the *environmental* management system"?

Answer: Yes. The intent of the definition of "outsource" in ISO 14001:2015 is to cover situations where a process or function that is within the scope of the environmental management system is performed by an organization that is outside the organizational boundaries of the environmental management system as determined by the organization. The definition is not intended to capture processes or functions that are outside the scope of the environmental management system as established by the organization.

August 22, 2016

The following interpretation regarding CSA Standard N286-12, Clause 4.8, has been approved by the N286 Technical Committee on Management Systems:

Question: Is it the intent of clause 4.8 to allow self-checking as a method to confirm that work meets requirements within a graded approach?

Answer: Yes.

Question: Is it the intent of clause 4.8.3 to allow self-checking as a method of inde pendent verification within a graded approach?

Answer: No

August 22, 2016

The following interpretation regarding CSA Standard N285.6.6-12, Clause 6.1.3, has been approved by the Technical Committee on CANDU Nuclear Power Plant Systems and Components (N285A):

Question: Is it the intent of Clause 6.1.3 of CSA N285.6.6-12 that NB2546.3 as referenced in NB2546.2(b) be used?

Answer: No

August 22, 2016

The following interpretation regarding CSA Standard CAN/CSA A123.21-14, *Standard test method for the dynamic wind uplift resistance of membrane-roofing systems*, has been approved by the Technical Committee on Bituminous Roofing Materials (A123 Series):

Question: "The test does not evaluate any wind resistance or wind-induced movement of the loose-applied elements of a PMR installed over the membrane."

Answer: Agree

July 19, 2016

The following interpretation regarding CSA Standard N285.4-05, *Periodic inspection of CANDU nuclear power plant components*, Clauses 12.2.2.4 and 12.2.2.3, has been approved by the Z954 TC on Periodic Inspection of CANDU Nuclear Power Plant Components (N285B):

Question 1: Are the requirements of Clause 12.2.2.4 (c) met for tubes that have manufacturing or installation inspections that were performed in accordance with Clause 12.2.2.1 and 12.2.2.3?

Answer 1: Yes

Question 2: If the results of the examinations that meet the requirements of Clause 12.2.2.1 are documented in the inspection records, are the records considered complete per clause 12.2.2.3 (d) if the examination recordings performed prior to installation are no longer available and the requirements of Clause 11.2 (c) are satisfied?

Answer 2: Yes

July 19, 2016

The following interpretation regarding CSA Standard CAN/CSA-A370-14, *Connectors for Masonry*, Clauses 8.1, 9.2, and Figure B.12, has been approved by the TC on Masonry Connectors (A203TC):

Question: Regarding Clause 8.1 of CSA-A370 standard, for a component known as an "adjustable tie assembly for use with steel studs" as shown per Figure B.12, is it correct that upon completion of all testing according to referenced Clause 9.2 and all other Clauses in cross-reference, the minimum results should be equal to or above 1000 N to comply with this requirement?

Answer: Yes

June 15, 2016

The following interpretation regarding CSA Standard Z275.2-15, *Occupational safety code for diving operations*, Clause 8.2.1.2, Item (d), has been approved by the Technical Committee on Occupational Diving and Hyperbaric Environments:

Question: Is it the intention of CSA Z275.2 that the role of the "diver's emergency assistant" specified for 3-man dive teams for surface-supplied diving have a certain level of competency in order to be capable of carrying out the prescribed duties?

Answer: Yes

Rationale: A "diver's emergency assistant" is defined as follows: *a person who is available and able to physically assist top-side personnel in the event of a dive emergency (see Clause 8.2.1.2).*

The intent of Clause 8.2.1.2 is to recognize operational situations where a full complement of qualified and competent diver, standby-diver, tender, and dive supervisor (four-man crew) may be viewed as being impractical or excessive. This could include diving in swimming pools, some movie productions, shallow inspections, etc., where the perceived risk to the diver has been determined to be minimal and satisfies the environmental requirements of 8.2.1.2 (a), (b), and (c).

However (no matter the perceived risk), if something were to go wrong and the standby diver was required to enter the water to effect a rescue or assistance, there remains a requirement for a fourth person to be available to assist the diving team in the rescue or assistance. Under no circumstances, would there ever be only three people on a diving operation. There would always be at least four competent personnel on site. The expected role (responsibility) is described in the definition for "diver's emergency assistant". This fourth person is required to be capable of carrying this duty (as acceptable to the dive supervisor) as defined in Z275.2-15 or be a competent diver's tender (CSA Z275.4-13, Clause 12).

As a minimum, the designated "diver's emergency assistant" should have received competency training, and possess knowledge and qualifications for the position as outlined in Z275.4 (Competency) clauses 4.4.1, 12.7.2 (j), and 12.7.3(d) (f) (j) and (k)) in order to qualify for the position.

June 15, 2016

The following interpretation regarding the subject of SCUBA diving in contaminated waters in CSA Standard Z275.2-15, *Occupational safety code for diving operations*, has been approved by the Technical Committee on Occupational Diving and Hyperbaric Environments:

Question: Is it the intention of CSA Z275.2 that SCUBA diving be an available option for diving in contaminated environments under controlled conditions (as per Section 11 and Table 8)?

Answer: Yes

Rationale: Conditions for the use of SCUBA for diving in contaminated environments are detailed in Clause 11 and Table 8. The use of SCUBA for this type of diving is limited to conditions where a risk assessment, including adequate water sampling, indicates that the level of contamination is clearly within Categories 3 or 4, see Clause 11 and Table 8.

The intent of Clause 11.3.3 is to provide a baseline or "default" condition for diving in contaminated environments. If there is any doubt as to the nature of the contamination, then the water is to be treated as per Category (CAT) 2 at a minimum. CAT 2 requires the use of a surface-supplied diving system with full encapsulation of the diver in a dry suit (see Table 8).

Clause 11.3.4 highlights the importance of completing a thorough risk assessment, including job hazard analysis (JHA), using all available information on the potential exposure of the dive team to contaminants (see Clause 11.3.2 for specific requirements). The risk assessment should be based on the particular location and situation of the intended diving area.

Personnel training and competency are key aspects in this process. Training in contaminated water diving to the competency levels required by CSA 275.4 for Unrestricted Surface Supply Diver, or equivalent training that is acceptable to the authority having jurisdiction, is recommended.

The Standard advises that users take into account the limitations of various diving techniques, especially if the use of SCUBA is under consideration (CAT 3 and CAT 4 only). Surface-supplied diving equipment generally provides a higher level of safety when diving in contaminated environments but it is recognized that this technique may not be appropriate in all scenarios.

If any of the specific diving scenarios identified above are present, it is recommended that additional measures, over and above the minimum standards of protection in Table 8, are implemented.

The intent of Clause 11.8 is to highlight the need for extra personnel when diving in a contaminated environment.

The requirement for an extra crew member/tender addresses additional demands placed on support personnel working in a contaminated environment such as implementing access control measures, and assisting with decontamination.

The Standard requires that the crew size for SCUBA also respect the existing minimum crew size requirements of Clause 7.5.

The Standard requires that the crew size for surface-supplied diving also respect the existing minimum crew size requirements of Clauses 8.2.1.1 and 8.2.1.2.

Question: Is it the intention of CSA Z275.2 that SCUBA diving be an available option with no differentiation between occupational diving user groups (e.g. it was not for police or scientific divers only)?

Answer: Yes

Rationale: Authorities having jurisdiction for ports, harbours, and other defined areas of underwater activity designate dive sites using these categories. When contaminated water assessments are performed (see Clause 11.3.2), the approaches recommended by *Health Canada Guidelines for Canadian Recreational Water Quality* are used to assist with such categorization.

June 7, 2016

The following interpretation regarding CSA Standard CAN/CSA-A370-14, *Connectors for Masonry*, Clauses 8.1, 9.2, and Figure B.12, have been approved by the TC on Masonry Connectors (A203TC):

Question: Regarding Clause 8.1 of CSA-A370 standard, for a component known as an "adjustable tie assembly for use with steel studs" as shown per Figure B.12, is it correct that upon completion of all testing according to referenced Clause 9.2 and all other Clauses in cross-reference, the minimum results should be equal to or above 1000 N to comply with this requirement?

Answer: Yes.

May 4, 2016

The following interpretation regarding CSA Standard B602-16, *Mechanical couplings for drain, waste, and vent pipe and sewer pipe*, has been approved by the Technical Committee on Mechanical couplings for drain, waste, and vent pipe and sewer pipe:

Question: Are Type 3 couplings only intended to join (questions listed below)?

1. According to Clause 1.2 (c), are Type 3 couplings only intend to join hubless cast iron pipe and fittings to hubless cast iron pipe and fittings.

No. What it is saying is that if you use a Type 3 couplings to join cast iron it must meet all the requirements in the standard for Type 3 couplings.

2. According to Clause 1.2 (c), can Type 3 couplings join hubless cast iron pipe and fittings to other pipe and fitting materials listed in the Note(below Clause 1.2).

Yes, provided they are dimensionally correct.

3. According to Clause 1.2 (c), can Type 3 couplings join any material to any material listed in Note (below Clause 1.2).

Yes, provided they are dimensionally correct.

Rationale: The language for Type 3 couplings described in CSA B602 Clause 1.2 (c) Standard is currently not clear. The language in this clause is confusing and is not being uniformly interpreted by users of this standard. This can cause couplings to be classified and evaluated incorrectly.

May 4, 2016

The following interpretation regarding CSA Standard CSA N285.4-09, Clause 12.2.2.2, has been approved by the N285B Technical Committee on Periodic & In-Service Inspections:

Question: When the baseline inspection for a plant that has been operating for more than 2 years was performed in accordance with CSA N285.4-94, does the CSA N285.4-09 edition require a retroactive baseline inspection of an additional 7 channels to comply with the sample size requirements of Clause 12.2.2.2?

Answer: **No.** For retroactive application of baseline inspection requirements other measures should be considered, see Clauses 3.5.3 and 12.2.2.3. It has been recognized that not all requirements of more recent editions of CSA N285.4 can be applied to reactor that is already in operation. Clause 3.5.3 provides direction on how to develop the period inspection program document for cases where N285.4-09 is being applied to an existing plant or to an existing periodic inspection program written to an earlier edition of CSA N285.4. As per Clause 3.5.3, the licensee (owner/ operator) is required to identify, in the updated periodic inspection program document, measures taken to compensate for the requirements that cannot be practically implemented. The licensee/ owner/ operator can make use of pressure tube manufacturing and installation records to credit these records as a baseline inspection record, in accordance with Clause 12.2.2.3.

May 4, 2016

The following interpretation regarding CSA Standard N285.4-09, Clause 13.2.4.3, has been approved by the N285B Technical Committee on Periodic and In-Service Inspections:

Question: Can a step wedge block of same carbon steel (or other similar grade material), that includes the range of thicknesses to be measured, be used for feeder pipe thickness measurement calibration?

Answer: No. Clause 13.2.4.3 is clear, and requires use of wall thickness measurement calibration specimen made from a length of feeder pipe made of the same material specification and same nominal diameter and thickness as the feeder pipe to be inspected. The Clause 13.2.4.3 requirements are part of an integrated approach, within N285.4-09, to establishing inspection procedures and inspection qualification to support accurate wall thickness measurements of feeder piping, which typically use automated scanners.

May 4, 2016

The following interpretation regarding CSA standard Standard ASME A112.18.1-2012/CSA B125.1-12, Water Dispensers, has been approved by the Members of the CSA Standards Technical Committee on Plumbing Supply Fittings (B125)

Question: Are water dispensers (e.g. filtration faucets, and beverage faucets) deemed as kitchen faucets?

Answer: NO

Do you agree with the recommended response?
Rationale: These are the units that are next to a kitchen faucet and connected to a filtration system under the sink.

May 4, 2016

The following interpretation regarding CSA standard ASME A112.19.2-2013/CSA B45.1-13, has been approved by the Members of the CSA Standards Technical Committee on Plumbing Fittings (B45):

Question: Per Clause 9.3.4 Water Closet Tank Repair Parts "Water Closet Tanks shall have a label indicating at least the following information per A, B, & C"

Answer:

1. Is it required to actually have a physical adhesive "label"? **NO**
2. Are other means of permanent marking such as pad printing or engraving acceptable? **YES**

January 4, 2016

The following interpretation regarding CSA Standard C22.1-12, *Canadian electrical code, Part I (22nd edition)*, has been approved by the Technical Committee for Canadian Electrical Code, Part I (Inside Wiring Rules):

Question: Is a receptacle that complies with Rule 26-704 and that is supplied as an integral part of a roof top unit considered to meet the requirements of Rule 2-314?

Answer: Yes

Question: When increasing the overcurrent protection of a feeder supplying a group of motors to allow for simultaneous starting in accordance with 28-204(2), after performing the calculation outlined in 28-204(2)
" permitted to be increased as necessary, to a maximum that does not exceed the rating permitted for a single motor having a full load current rating not less than the sum of the full load current ratings of the greatest number of motors that start simultaneously, provided that this value does not exceed 300% of the ampacity of the feeder conductors"
should we then add the sum of the full load current ratings of all other motors that will be in operation at the same time?

Answer: Yes