

Information Bulletin No. IB20-016

June 1, 2020

INTERPRETATION

Fitting Design Registration by an Organization that does not have Manufacturing Facilities

INTRODUCTION

This Information Bulletin applies to the design registration of fittings by organizations that supply fittings under their brand name or mark, but do not have manufacturing facilities.

CSA B51:19 addresses this situation in Clause 4.2.5, which states in part, “*Fitting design registration shall be in the name of the organization taking responsibility for the product...*” The *Pressure Equipment Safety Regulation* does not specifically address an “organization taking responsibility for the product”, but does address persons that design, construct, manufacture or import pressure equipment.

This Information Bulletin establishes that an organization that does not have manufacturing facilities may register a fitting design that is to be marked with their brand name or mark. An organization that registers a fitting design in this manner is deemed to be the person responsible for compliance with the manufacturer’s duties specified in the *Pressure Equipment Safety Regulation*.

INTERPRETATIONS

Pressure Equipment Safety Regulation

Section 14

14(1) No person shall

- (a) construct or manufacture for use in Alberta, or*
- (b) import for use in Alberta*

any pressure equipment unless the design of that pressure equipment is registered by the Administrator or a safety codes officer pursuant to section 40 of the Act and the design of the pressure equipment meets the requirements of this Regulation.

TYPE: INTERPRETATION	DESCRIPTION: FITTING DESIGN REGISTRATION BY ORGANIZATION THAT DOES NOT MANUFACTURE	REGULATION: PESR
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An organization that is not the manufacturer of a fitting may register the design of the fitting(s) to be identified with their brand name or mark provided they take responsibility for the fitting manufacturing in accordance with CSA B51 Clause 4.2.5.

Section 11

“11(1) A person shall not

*(a) construct or manufacture pressure equipment,
unless that person holds a certificate of authorization permit.”*

An organization that does not manufacture the fitting and has registered or intends to register the design of the fitting to be identified with their brand name or mark, is deemed to be a manufacturer in context of Section 11(1).

Organizations based in Alberta shall hold a Certificate of Authorization permit pursuant to Section 11(1)(a) of the *Pressure Equipment Safety Regulation*. It is acceptable for organizations based outside of Alberta to hold an equivalent certificate of authorization issued by any Canadian pressure equipment regulatory authority; or a quality system certificate issued by an independent third party recognized by ABSA.

IMPLEMENTATION

Design Registration

The design registration submission from an organization described above shall include all the items specified in Section 17 of the *Pressure Equipment Safety Regulation*, and shall include:

- 1) evidence the organization has a quality control program in place certified by ABSA for organization within Alberta, or an equivalent certificate for an organization outside of Alberta.
- 2) a list of the subcontracted suppliers that will manufacturer the fittings, and
- 3) evidence that each subcontracted supplier has a valid quality control program for manufacturing fittings, and the quality control program shall be certified by ABSA for organization within Alberta, or an equivalent certificate for an organization outside of Alberta.

Quality System Certification

The organization's quality management system shall include appropriate controls of the fitting fabrication process to ensure quality and shall address:

- the selection of the subcontractors that design and manufacture the fittings,
- the manner in which the organization controls the entire fitting production including, but not limited to, the control of design, material selection, procurement, manufacturing, inspection, final product testing, marking and any applicable certification.

<original signed by>

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