



AMERICAN SOCIETY OF  
SAFETY PROFESSIONALS

April 13, 2022

U.S. Department of Transportation/FAA  
Attention of the Desk Officer  
Office of Information and Regulatory Affairs  
Office of Management and Budget, Docket Library  
Room 10102, 725  
17th Street NW  
Washington, DC 20503.

**Agency Information Collection Activities: Requests for Comments; Clearance of a New Approval of Information Collection: FAA Advisory Circular 120-119, Voluntary Safety Management System for Other Regulated Entities Transporting Dangerous Goods by Air**

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Per direction of the announcement in the April 8th Federal Register announcement, we submit the following correspondence and attached materials addressing the [call for comment](#) noted above.

The [American Society of Safety Professionals \(ASSP\)](#) is the oldest society of safety professionals in the world. Founded in 1911, we represent over 36,000 professionals advancing workplace safety and health in every industry, in every state and around the globe. ASSP members have set the occupational safety and health (OSH) community's standards for excellence, ethics and practice for more than 100 years.

It is important to note that the Society does not have an overall position on the notice. This submission is only intended to offer technical materials and background materials that might be of assistance during future review of safety management systems by the Federal Aviation Administration. We are aware that the ASSP materials are related to occupational



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safety and health but might be of some interest based on the proposal detailed in the Federal Register.

The following materials and files are attached, and we hope they are of value:

ASSP has a position statement on the use of management systems and the return-on-investment for the implementation of such programs.

We are not sure if the Federal Aviation Administration is aware, but the U.S. Department of Labor is finalizing an extensive study on the use of safety management systems. We are aware that the results of this study may not necessarily apply to this proposal. However, the Federal Aviation Administration may get some value from the study after its release. [Agency Information Collection Activities; Submission for OMB Review; Comment Request, Employer Adoption of Voluntary Health and Safety Standards, New Collection](#)

If the FAA requests, we would be pleased to make the following standards available for review and consideration:

- [ANSI/ASSP Z10.0-2019](#): *Occupational Health and Safety Management Systems*. Scope: *This standard provides a management tool to improve performance, provide safe workplaces and reduce the risk of occupational injuries, illnesses and fatalities.*
- [ANSI/ASSP/ISO 45001-2018](#) *Occupational Health and Safety Management Systems - Requirements with Guidance for Use*. Scope: *This document specifies requirements for an occupational health and safety (OH&S) management system, and gives guidance for its use, to enable organizations to provide safe and healthy workplaces by preventing work-related injury and ill health, as well as by proactively improving its OH&S performance.*

FAA can also obtain additional background information addressing both [Z10](#) and [45001](#) on the ASSP webpage.

Thank you for your attention to this matter and please let us know if we can provide any additional information on safety management systems.

The primary staff contact if you should have any questions is listed below:



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