

Atlantic Offshore Occupational Health and Safety Initiative - Proposed Policy Intent for Phase 3 of the Atlantic OHS Regulations

Heading	Section	Content	Subsea 7 Comments
Definitions	"Medic"	<p>"Medic" means a competent person who</p> <p>a) has experience with helicopter or fixed-wing aircraft evacuation for medical purposes,</p> <p>b) is the holder of an advanced cardiac life support certificate or basic cardiac life support instructor's certificate issued by a body recognize by the International Liaison Committee on Resuscitation (ILCOR), and</p> <p>c) is the holder of:</p> <p>i. a license to practice medicine in Canada and have at least two years' clinical experience in intensive care or emergency practice, or</p> <p>ii. a Registered Nursing Certificate issued by a provincial regulatory body and have at least two years' clinical experience in intensive care or emergency practice, or</p> <p>iii. a Paramedic III (P3) Certificate issued by a college accredited by the Canadian Medical Association and have at least three years' experience as an advanced life support provider.</p>	<p>a) Recommend stating that it is not necessary for a medic onboard a vessel with no helideck to have experience with helicopter or fixed-wing aircraft.</p> <p>Vessel Medics play a vital role in the health and safety of all personnel onboard. In addition to regular medic duties, the vessel medic is often responsible for creating a positive HSE culture and ensuring adherence to HSE codes and practices. Changing out this position for a "Canadian Medic" often generates additional risk due to unfamiliarity with the crew, vessel and its equipment. Therefore, please consider the following;</p> <p>Cii) Recognize other international accredited nursing certificates, or nursing certificates that conforms to a Registered Nursing Certificate issued by a provincial regulatory body.</p> <p>Ciii) Recognize other international accredited Paramedic certificates, or Paramedics certificates that conforms to the Canadian Medical Association.</p> <p>If the above is not possible, consider exempting medics from this requirement for vessels operating offshore for short duration campaigns.</p>
OHS Management System	3	Operator must maintain a list of all standards used as alternatives to those that are prescribed (where conformance is permitted) and where the Operator wishes to make a subsequent change to the list, the CSO must be accepted prior to the change occurring.	<p>Suggest adding a section explaining how the "approved alternatives" processes is to be conducted.</p> <p>Suggest stating that these lists are to be made available to contractors working on behalf of the Operator.</p>
OHS Program	4	<p>c) a list of any alternate standards used as alternatives to the prescribed standards (where conformance is permitted);</p> <p>d) conformity assessments demonstrating equivalency (or better) of any alternate standards used in the workplace (where conformance is permitted);</p>	Suggest stating that conformity assessments are to be made available to contractors working on behalf of the Operator.

Workplace Committees	5	All committee members shall be provided training that permits them to competently carry out their function on the committee.	Elaborate on the training required for workplace committee members. Is this the same training required under provincial legislative requirements?  If yes, suggest exempting those on safety committees working on board vessels operating in the province for short durations.
Fatigue Management	17	A Fatigue Management Program shall be established and maintained to effectively manage fatigue and to reduce incidents, injuries and damage where fatigue is recognized as a factor. The program shall address, at minimum: a) Identification of the factors that may impact fatigue, including work scheduling, task type and length, work and workplace conditions, employee health and stress; b) Maintaining an appropriate work shift design that allows adequate recovery periods; c) Maintaining records related to persons working excessive hours or without the minimum rest periods; d) Roles and responsibilities of all workplace parties in managing fatigue; e) Training for all workplace parties on safe work practices and procedures related to fatigue as a hazard; f) Regular monitoring of the workplace, including reviews of incidents reports, ergonomic and environmental factors, work hour exceedances, employee complaints and workplace committee reports to identify any trends of fatigue; g) Consideration of fatigue as a hazard in all safe work practices and procedures; h) Consideration of fatigue when investigating incidents preventative action(s) used to eliminate fatigue or reduce the impact of fatigue.	For international vessels working in the provinces for a limited duration, suggest aligning rest hours with the Maritime Labor Convention;  5. The limits on hours of work or rest shall be as follows: (a) maximum hours of work shall not exceed: (i) 14 hours in any 24-hour period; and (ii) 72 hours in any seven-day period; or (b) minimum hours of rest shall not be less than: (i) ten hours in any 24-hour period; and (ii) 77 hours in any seven-day period. 6. Hours of rest may be divided into no more than two periods, one of which shall be at least six hours in length, and the interval between consecutive periods of rest shall not exceed 14 hours. 7. Musters, fire-fighting and lifeboat drills, and drills prescribed by national laws and regulations and by international instruments, shall be conducted in a manner that minimizes the disturbance of rest periods and does not induce fatigue. 8. When a seafarer is on call, such as when a machinery space is unattended, the seafarer shall have an adequate compensatory rest period if the normal period of rest is disturbed by call-outs to work.
Hazardous Substances	34	Where there is a hazard of ignition of a hazardous substance or combination of hazardous substances, by static electricity, the Employer must adopt and implement practices that conform to the National Fire Prevention Association publication NFPA 77: Recommended Practice on Static Electricity.	Marine vessels are compliant with applicable Classification Authority (CA) requirements, not NFPA 77. Vessels are designed and built to mitigate hazards associated with hazardous substances/static electricity in accordance with applicable CA rules and regulations.

Hazardous Substances	38	Where a flammable or combustible substance is dispensed or transferred inside a hazardous substance storage room or area, a) the storage room ventilation shall conform to the National Fire Prevention Association publication NFPA 30: Flammable and Combustible Liquids Code, as applicable; b) exhaust air shall be discharged to the outdoors area that does not create a hazard, and makeup air provided; c) makeup air duct passing through a fire separation shall be equipped with an approved fire damper; fire damper should be fitted to close automatically on fire detection or arming of a related fire suppression system; and d) doors shall be self-closing.	Storage areas for hazardous substances onboard vessels shall be designed and constructed in accordance with Classification requirements.
Assembly of Pipes	42	Every assembly of pipes, pipe fittings, valves, safety devices, pumps, compressors and other fixed equipment that is used for transferring a hazardous substance from one location to another shall be a) marked, by labelling, colour-coding, placarding or any other mode, to identify the hazardous substance being transferred and, if appropriate, the direction of the flow; b) fitted with valves and other control and safety devices to ensure its safe operation, maintenance and repair; and, c) designed to control static electricity.	Assembly of pipes, pipe fittings, valves, safety devices, pumps, compressors and other fixed equipment that is used for transferring a hazardous substance on board vessels shall be designed, constructed, and maintained in accordance with Class requirements.
Protective Work wear	80	3) Where there is a hazard from moving equipment or loads, work wear must be selected and conform to CSA Z96 High-Visibility Safety Apparel. 4) Work wear must be selected in accordance with the Appendix on selection in CSA Standard Z96 High-Visibility Safety Apparel.	Coveralls worn on Subsea 7 vessels do not currently conform to CSA Z96. However, work areas are illuminated as required, mitigating the need for high vis apparel. Additionally, introducing new PPE could cause additional risk due to the unfamiliarity of the work wear.  Suggest instead of stating PPE must conform to the CSA standard, introduce text to state appropriate PPE shall be worn as deemed appropriate via risk assessment.
Respiratory Protection	86	3) If air is provided for the purpose of a respiratory protective equipment: a) the air must be certified to CSA Standard Z180.1, Compressed Breathing Air and Systems; and b) the system that supplies air must be tested, operated and maintained in conformance with the CSA Standard referred to in paragraph (a).	Internationally operated vessels do not commonly have compressed breathing air systems certified to CSA Standard Z180.1. However, systems are certified and maintained to other internationally recognized standards;  - EN 12021 - Compressed Air Breathing Quality - OSHA 1910.134 - Respiratory Protection
Respiratory Protection for Emergency Egress	87	2) Smoke hoods to protect against smoke inhalation must be provided in sleeping quarters and machinery spaces.	Not all vessels are equipped with smoke hoods. Suggest stating that vessels shall be equipped with life saving devices as required by Class and IMOs FFS Code.

Medical Supplies and Equipment	109	<p>1) The Employer shall carry out a risk assessment, in consultation with a medic, to determine the appropriate type and quantity of medical supplies and equipment necessary for the workplace, giving consideration to the following:</p> <ul style="list-style-type: none"> <li>a) number of POB;</li> <li>b) nature of work and activities carried out in the workplace and the real and potential hazards related to that work or activities;</li> <li>c) distance to and response time for emergency medical services;</li> <li>d) layout of the workplace;</li> <li>e) environmental factors, including thermal considerations.</li> </ul>	<p>Medical supplies on board vessels are not determined based upon a risk assessment.</p> <p>Medical supplies is maintained in accordance with the International Medical Guide for Ships. Additionally, for vessels engaged in diving activities, IMCA has its on medical requirements, specifically DMAC 15-Medical Equipment to be held at the Site of an Offshore Diving Operation.</p>
Fire Team Personal Protective and Associated Equipment	120	All	<p>Align this section with the current firefighting requirements as per recent amendments to the transitional regulations;</p> <p>(3) However, if the marine installation or structure is a ship used for diving, construction, geotechnical or seismic work, fire protection equipment may instead be installed, inspected and maintained in accordance with the following standards:</p> <ul style="list-style-type: none"> <li>(a) the standards set out in regulation 10, Fire fighting, of Chapter II-2 of the International Convention for the Safety of Life at Sea (SOLAS), 1974;</li> <li>b) the standards set out in the International Maritime Organization’s International Code for Fire Safety Systems; and</li> <li>(c) the standards of the American Bureau of Shipping, Bureau Veritas, DNV GL or Lloyd’s Register.</li> </ul>
Emergency Drills and Exercises	126	<p>2) Notwithstanding the above, the following drills and exercises must be conducted at the minimum frequency specified below: a) A fire drill conducted monthly; b) A drill to practice mustering must be conducted weekly; c) A drill to practice evacuation and abandonment of the workplace, including lowering of davit-launched lifeboats (without launching) where applicable, must be conducted at least monthly; and, d) Where the workplace is equipped with lifeboats:</p> <ul style="list-style-type: none"> <li>i. lifeboats must be boarded by employees wearing survival suits and securing themselves on a seat in a manner that ensures that each employee participates in this exercise at least every 3 months;</li> <li>ii. An annual drill with lifeboat lowering, launching and operation/manoeuvring, type dependent;</li> <li>iii. davit-launched lifeboats are launched and manoeuvred in the water annually;</li> <li>iv. Free fall lifeboats are launched and manoeuvred annually either: <ul style="list-style-type: none"> <li>a. By free fall; or</li> <li>b. Secondary means (e.g. crane), coupled by simulated launching.</li> </ul> </li> </ul>	<p>For vessels, this section should be aligned with SOLAS Chapter 3 - Life Saving Appliances, Regulation 19 - Emergency Training and Drills.</p>