



From: Dennis Barrington <[REDACTED]>
Date: August 23, 2021 at 5:22:13 PM ADT
To: "Phillips, Kim" <kim.phillips@nrca-nrcan.gc.ca>
Subject: Feedback: Proposed OHS Regulations - CG1 July 24, 2021

Kim,

I have submitted comments through CAPP via Suncor.

At this time, I will reiterate my earlier concerns regarding reference to CSA as guidance for Offshore operations. The current versions of CSA Diving Standards are not competent for Offshore use and reference to them will require continuous stewardship of the applicable Z275 standards, and the qualification of the Committee members making changes to them.

The proposed regulations shift the bulk of technical screening to the Client Diving Safety Specialist (Offshore) and the Offshore Petroleum Boards. This is a workable solution, but only if these parties insist on adherence to IMCA, IDRCF, and other international standards for operation within their jurisdictions.

Regards,

Dennis Barrington

