

Good Day Kim,

Thank you very much for the opportunity to comment on the OHS Proposed Policy Intent Phase 2 document.

I will offer a couple of specific items in the scope of Phase 2 but I would also like to take the opportunity to make a more general comment.

Planned changes to legislation should consider, and efforts should be made, to include a larger selection of internationally recognized regulations, standards and guidelines. This is especially relevant when vessels are arriving to do short duration/single season projects as the uncertainty around the approval process can have significant effects on projects, even to the point of possibly rendering them unachievable.

Looking at the CNLOPB Substitutions and Exemptions page for 2017 it is easy to observe the same items being listed by several different companies (i.e. Cranes, Food Safety, Ropes/Slings/Chains...etc). In many cases these different companies are applying for exemptions and using the same standards in lieu of the regulated standards.

I realize it may be beyond the scope of this process but when considering future changes to legislation it might benefit the industry to put an emphasis on Class Society regulations for marine vessels, as well as maintaining clearer distinctions between regulations for marine vessels versus platforms/rigs.

With reference to specific items in the Phase 2 Consultation Draft Policy Intent

2) The use, maintenance, inspection and operation of offshore cranes must conform to either:

a) API Standard API RP 2D, API Recommended Practice for Operation and Maintenance of Offshore Cranes ; or

b) EN 13852-1 Cranes, Offshore Cranes, Part 1-General Purpose Offshore Cranes.

Other internationally recognized standards of operation should be considered here.

For example: NORSOK Standard Safe Use of Lifting Equipment R-003 which has been used to apply for (and have granted) RQ Exemptions by at least 3 different vessels which are operating or planning to operate in the 2017 season.

Item 64

64 1) The design, construction, inspection, testing, maintenance and use of any loose lifting gear must conform to the following standards, as applicable, to the type of equipment being used.

a) ASME B30.9 - Slings

b) ASME B30.10 - Hooks

c) ASME B30.20 - Below the Hook Lifting Devices

d) ASME B30.26 - Rigging Hardware

Other internationally recognized standards of operation should be considered here when it comes to the use of loose lifting gear.

For example: International Association of Oil and Gas Producers (OGP) Lifting and Hoisting Safety Recommended Practice, Report No. 376, April 2006 which has been used to apply for (and have granted) RQ Exemptions by at least 3 different vessels during the 2017 Season.

Thanks very much for the opportunity to submit these comments.

Best regards,

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