

Spicer, Roberta (NRCAN/RNCAN)

From: Ron Pitcher <ronpitcher@prodiver.ca>
Sent: 19-Mar-21 3:14 PM
To: Phillips, Kim (NRCAN/RNCAN)
Subject: Offshore OHS Regulations
Attachments: RGP Comments OHS Regulations 19 March 2021.docx

Kim,

Please find attached my comments to the NL Offshore OHS Regs draft. If you should have any questions please do not hesitate to contact me.

regards,

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STAKEHOLDER COMMENTS ON DRAFT CANADA- NL OFFSHORE OCCUPATIONAL HEALTH AND SAFETY REGULATIONS

Reviewer/Comments From: Ron Pitcher, P. Eng, VP, Operations & Technical Services, Pro-Dive Marine Services

#	Section of Draft OHS Regulation	Problem with Insufficient Protection Against the Hazard	Problem Created from Technical or Commercial Perspective	Proposed solution/changes
1.	Prohibitions 164 (b)		Technical wording Wording change to capture all surface-supplied mixed gas diving mixtures and techniques.	Proposed wording change: (b) surface-supplied diving using a helium-oxygen breathing mixture. (b) using surface-supplied mixed gas diving techniques.
2.	Dive safety specialists 166 (1) (a)		The designation of “Dive safety specialists” may create confusion as DCBC has two separate categories of DSS. CSA’s Inshore Dive Safety Specialist has no offshore qualifications or experience required.	Proposed wording change: Offshore Dive Safety Specialists.
3.	167 (1)(a)	Emergency planning must include means for vessel and diving teams to work together.		Proposed wording change “(a) set out procedures for responding to all vessel or dive system emergencies that have the potential to compromise divers’ safety;” (a) set out procedures for responding to all vessel and dive system emergencies that have the potential to compromise divers’ safety;
4.	Emergency response plan 167 (c)	If there is any loss in communication the dive should be terminated		Proposed wording change (c) set out procedures to be followed in the case of total loss of communication; (c) set out procedures to be followed in the case of any loss of communication;
5.	Dive project plan 169 (1) (a) (iv)	I have some concern with the referencing of CSA Z275.2 in general. To my knowledge there is not a single Canadian built or Canadian flagged dive support vessel operating in Canadian waters. All offshore dive operations have		Proposed solution Consider referencing IMCA guidance documents where applicable.

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		<p>been conducted by companies using foreign vessels. The guidance documents developed by IMCA and recognised internationally cover an array of topics on diving safety that are based on the collective knowledge of a vast number of experienced contractors and individuals. I do not want to belittle or negatively imply anything towards CSA but the fact of the matter is they simply do not have the critical mass of knowledge and experience that the IMCA organization has access to.</p>		
6.	Dive project plan 169 (1) (k)	Diving incidents in the offshore diving industry involve DP operations highlight the need for safe guidance		<p>Proposed solution reference the following guidance;</p> <p>IMCA D 010 Diving Operations from Vessels Operating in Dynamically Positioned</p>
7.	Dive contractor obligations 170 (1) (a)	The referenced guidance document is dated.		<p>Proposed solution Remove; Maritime Organization Resolution A.831(19) of 23 November 1995, Code of Safety for Diving Systems, 1995;</p> <p>Replace or include a requirement to conform to “IMCA D 014 international code of practice for offshore diving”. A description below of what IMCA D014 guidance provides; From IMCA’s website “While national regulations take precedence over the code, it is a strong and recognised source of good practice. This code provides advice on ways in which diving operations can be carried out safely and efficiently. It outlines minimum requirements, creating a safe ‘level playing field’ for all diving contractors. It also recommends how clients and contractors may analyse the safety implications of commercial requirements.”</p>

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8.	Dive contractor obligations 170 (1) (b)	CSA has identified that support for Z275.5 training standard will end. Z275.5 provides learning objectives and establishes the responsibilities and requirements of Canadian diver training institutions and is the training path to achieve Z275.4 competency.		Proposed solution IMCA provides internationally recognised guidance for training and competency assessment which is acceptable to DCBC. Reference the applicable guidance documents. To ensure regulators have the authority to address specific training needs into the future also include; <u>and</u> acceptable to the Chief Safety Officer.
9.	170 (1) (f)	Current wording does not allow for a back up system for communication with diving physician in the event of an emergency. " any person performing first aid on a diver has unimpeded access to a means of communicating with the diving physician specialist;"		Proposed wording change: "any person performing first aid on a diver has unimpeded redundant access to a means of communicating with the diving physician specialist;"
10.	170 (1) (r)	Current wording is vague. "every diver's location in the water is continuously monitored for the duration of each dive;"		Proposed wording change: (r) every diver's location in the water is continuously monitored by means of an electronic depth meter for the duration of each dive;
11.	170 (1) (u)	It appears that a word is missing.		Proposed wording change: "decompression is carried out only in accordance with the applicable decompression table identified in the dive project plan , except in extenuating circumstances and in consultation with a diving physician specialist;"
12.	170 (2)	No guidance for surface supplied diving cited.		Proposed solution Consider referencing IMCA guidance documents where applicable.

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		The guidance documents developed by IMCA and recognised internationally cover an array of topics on diving safety that are based on the collective knowledge of a vast number of experienced contractors and individuals.		
13.	170 (2) (a)	Current wording does not provide satisfactory protection in the event that the designated DMT is the injured diver. "at least one member of the dive team at the dive site at all times holds a valid diving medical technician certificate;"		Proposed wording change: "at least two members of the dive team at the dive site at all times holds a valid diving medical technician certificate;"
14.	170 (2) (e)	Minimum acceptable size of chamber offshore not identified. 60" (150mm) chambers are capable of providing two treatment beds suitable for two working divers in the water. No mention of a medical lock or chamber equipped with an interlock system.		Proposed solution Wording change (e) sufficient 60" (150mm) double-lock deck compression chambers equipped with a medical lock and interlock system that allow for decompression in accordance with the applicable decompression table identified in the dive project plan are available at the workplace to accommodate all divers who need to undergo decompression at any one time as well as all other persons needing to be in the chamber with the divers to carry out the decompression procedures or provide medical care to them; and
15.				
16.				