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To
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Response to Atlantic Offshore Occupational Health and Safety Initiative

CSA Group has reviewed the Consolidated and revised Atlantic Offshore Occupational Health and Safety Initiative document from May 2018 for Atlantic OHS Regulations. Please see our comments which pertain to equipment that will be purchased and installed for use within the construction and implementation of oil platform within the ocean waters of Newfoundland and Nova Scotia.
We have also listed our concern regarding the following:

Part 1: Interpretation

In reference to the term "certified to", it's indicated that certification organizations are to be accredited. We are asking if this is referencing to accreditation by Standards Council of Canada (SCC) or an accreditation body recognized by the Standards Council of Canada.

The term **Recognized Classification Society or Certifying Authority in**

Part 2: **General**
Section 2
Part 21: **Elevators and Man lifts**
Standards (209)
Part 22: **Material Handling**
The term "**Recognized Classification Society or Certifying Authority"** is not formally defined. It is recommended to define the term and clarify their roles and responsibilities.

A. Classification Society rules and/or codes typically refer to IEC Ex/ATEX requirements. Canada adopts IEC 60079 series of standards for EX equipment and these adoptions may include Canadian national differences to account for our Canadian codes and infrastructure. The requirements for ATEX type certifications are not typically compatible with the CEC requirements for equipment that is installed within ordinary or hazardous locations.
    - Under the Canadian safety system all hazardous locations equipment IE zones 0, 1 and 2 are required to be certified. Under the Canadian

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electrical safety system equipment certification must include fire and electric shock testing as well as testing in explosive atmospheres.

- Under ATEX program only zone 0 and portion of Zone 1 electrical equipment is required to be certified by a notifying body. Zone 2 electrical equipment covered under the ATEX program is permitted to have a supplier's/Self declaration of conformity and would not be required to be certified. Also under the ATEX program the equipment is only tested for explosive atmosphere's and does not cover the equipment fire and Electric shock testing.
- Assurance of a manufacturers' ongoing conformity to producing equipment to a specific standard may not be possible. Recognized Classification Agencies may not be SCC accredited certification bodies that will ensure the equipment's production will meet the Canadian product certification standards.

B. Installation of various pieces of equipment that have been designed to various international standards may not be harmonized or compatible with Canadian Code and Standards may result in improper installation, repair and risk potential, fire, explosion and harm to personnel during installation and operation.

C. The proposal may conflict with the CETA agreement between The Government of Canada and the European Union. For example, ATEX certified equipment entering Canada is mandated to meet Canadian specific requirements and the inverse is true when Canadian equipment is to be shipped and installed within Europe.

D. It is noted that clause 74 (1) that was referenced in SOR was not included in the revised version.
Canada – Newfoundland and Labrador Offshore Marine Installations and Structures Occupational Health and Safety Transitional Regulations
SOR (Statutory Orders and Regulations) /2015-1
74 (1) All electrical equipment in a hazardous location, as defined in the Canadian Electrical Code (CEC) must be constructed, certified and marked in accordance with that code.
This clause in previous document from 2015 is in line with requirements to have electrical equipment certified or evaluated as covered in section 2 of the Canadian Electrical Code, Part 1

Part 28: Electrical Safety

Section 331 and 347

Reference to 'replacing components of a defective electrical equipment or equipment itself with a suitably certified component/ equipment' is recommended to be added.

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Part 33: Batteries

Section 418

Due to the hazardous and explosive potential of storage batteries we recommend they be certified to the appropriate standards.

Part 34: **Design, Construction, Operation and use of tools**

Clause 421

In part A reference to the Canadian version of adopted IEC standard 60745-2 as well as reference to the same ULC standard and IEC standard. CSA has adopted the IEC 60745-2 as the Canadian Standard for Portable electric tools. ULC has not adopted this standard as CSA has adopted it for Canada. Reference to International Electro technical Commission (IEC) standard 60745-2 is not required as mentioned earlier, CSA has already adopted this standard for Canada that may include Canadian national differences that would not have been captured in the IEC only standard.

For questions or comments, please reach out to

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