

Spicer, Roberta (NRCAN/RNCAN)

From: Dennis Barrington <dennisbarrington@yahoo.com>
Sent: 19-Mar-21 12:26 PM
To: Phillips, Kim (NRCAN/RNCAN)
Subject: Re: Draft OHS Regulations - Diving

Reference DMAC 12 which currently states 30km but would be updated if the seismic industry develops bigger guns in future.

Regards,

Dennis Barrington
(705) 627-2008

On Friday, March 19, 2021, 11:17:08 a.m. EDT, Phillips, Kim (NRCAN/RNCAN) <kim.phillips@canada.ca> wrote:

Thanks Dennis.

Proximity to seismic... is there a distance you would recommend or a reference document you could refer us to?

Sent from my iPhone

On Mar 19, 2021, at 12:13 PM, Dennis Barrington <dennisbarrington@yahoo.com> wrote:

Hi Kim,

My comment sheet is attached. Feel free to contact me should you require clarification on any of the comments or if I can be of help in any way.

Regards,

Dennis Barrington
(705) 627-2008

On Friday, March 5, 2021, 02:07:53 p.m. EST, Phillips, Kim (NRCAN/RNCAN) <kim.phillips@canada.ca> wrote:

Hello again,

I wanted to follow-up specifically with diving stakeholders to let you know that the part on diving should not be read independently of the rest of the regulations. The entire regulation applies to diving program (to the extent it is applicable) and the vessel/installation it takes place from; in addition to Part 33, I would recommend reviewing Parts 2 -6 in particular, as well at the Part III.1 of the Act, which can be found here: <https://laws.justice.gc.ca/eng/acts/C-7.5/>

Any questions at all during your review, please don't hesitate to reach out.

Thanks

Kim Phillips

Senior Regulatory Officer | Agente principale de réglementation
Natural Resources Canada | Ressources naturelles Canada
kim.phillips@canada.ca / +1 (902) 402-0285

<OHS Regulations Stakeholder Dennis Barrington DSS Comments Mar-21.docx>

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

Reviewer/Comments From: Dennis Barrington DSS

#	Section of Draft OHS Regulation	Problem with Insufficient Protection Against the Hazard	Problem Created from Technical or Commercial Perspective	Proposed solution/changes
1.	166.1.a	Does not clarify requirement for an "Offshore" DSS	Incompetent individual (Onshore DSS) could be placed in the role	Replace DSS with Offshore DSS.
2.	166.1.b	Requires the Operator's Senior Client Representative to use the title "Installation Manager" contrary to Accepted International practice.	Confusion regarding roles of Operator Installation Manager and FPSO/Platform Offshore Installation Manager and Contractor Offshore Construction Manager	Add " or Senior Client Representative"
3.	167.1	Word "or" allows choice between parties to be consulted.	Could eliminate full collaboration by all parties	Change to "and"
4.	169.1	Word "or" allows choice between parties to be consulted.	Could eliminate full collaboration by all parties	Change to "and"
5.	170.1.a	IMO standard is outdated and incompetent when compared to IMCA standards	Sub standard equipment could be proposed as compliant	Replace IMO standard with IMCA and include requirement for an in-date IMCA audit appropriate to the equipment used. ie D024 for saturation system.
6.	170.1.k	Defined value is not applicable to most situations without calculating specific depth. Value at surface is too high for a single diver. Word "supplied" indicates it must go to the diver at all times.	Does not achieve its intended purpose of specifying a minimum gas requirement	Change to "surface equivalent of " Change "Supplied" to "available"
7.	163.1.o	No definition of "vicinity"	Confusion over requirement to notify.	Specify specific distance that would trigger requirement to notify. Also, some seismic activity is freelance and therefore, independent of the Operators. Approval by the Boards should trigger notification to Operators with specific instruction to inform diving Contractors.

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

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8.	169.1.a.iv	CSA standard subject to change according to opinions of non-offshore members.	Change in CSA standard to benefit an onshore project would alter offshore requirement	Specify maximum length of bell runs and diver lockouts or require Chief Safety Officer to approve changes to CSA standards.
9.	169.1.m	Project Plan cannot include some specific details which result from the evolution of a particular project.	An unanticipated subsea lift would require alteration of the Project Plan.	Require details of “general guidelines” for managing things like subsea lifts, with a specific plan to be developed and included in the Dive Plan prior to the task being carried out.
10.	170.1.b	CSA standard subject to change according to opinions of non-offshore members.	Change in CSA standard to benefit onshore personnel would alter offshore requirement	Cite international standards (IRDCF, IMCA etc) or require Chief Safety Officer to approve changes to CSA standards.
11.	170.2.e	Fails to define a minimum standard	Inadequate size could be used	Add “minimum 60” inside diameter”
12.	170.3.e	Reference	N/A	Good to see reference to IMCA D052 Audit in this application
13.	General	Overall lack of prescriptive guidance	Leaves too many opportunities for interpretations that allow lower standards.	Add references to IMCA Guidance and a regulation requiring the individual Boards to develop and maintain more prescriptive guidance. Ie Single vs twin bell systems.

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