

## Phillips, Kim (NRCan/RNCan)

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**From:** Bill Hynd <billhynd@nfl.nf.ca>  
**Sent:** Thursday, October 05, 2017 8:37 AM  
**To:** Phillips, Kim (NRCan/RNCan)  
**Cc:** mshortall@nfl.nf.ca  
**Subject:** Response to the offshore diving session

Hi Kim,

We appreciate the invite to attend the Offshore Diving: Proposed Policy Intent for the Atlantic OHS Regulations. When making recommendations on offshore OHS regulations the NLFL works with its affiliates who are directly engaged in offshore work.

In the case of Offshore Diving the focus is clearly on diving contractors and their responsibilities in ensuring diving safety. You clearly received a lot of feedback to your draft text, from experts in the field of offshore diving. We expect that the finalized text will ultimately lead to the highest standards of safety for the workers engaged in the offshore diving profession.

My one observation, as someone green to most of the technical aspects, was to note that on page 15, section 21 Dive Safety Specialists, you introduce the roles and authority of "The Operator". While it may be obvious to most who constitutes the operator, I think it would be beneficial and proper to define and add to the Definitions section (see Pg. 8 - 9).

The same applies to the discussion around Diver Access – Surface Supplied Diving (pg. 22 section 54). Here you talk about freeboard size in relation to the need for a risk assessment, without defining what a freeboard is. You might want to add freeboard to your definitions section.

Thanks again for the opportunity to observe these important discussions,  
Bill

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