

Daniel:

Please see below comments on the Proposed Policy Intentions for Phase 3 of the Framework Regulations for the Frontier and Offshore Regulatory Renewal Initiative (FORRI).

1. Clarification needed to confirm that assistance with the certification plan in 5.7 would not be considered a conflict of interest under 5.6.
2. Safety Critical Elements (SCEs) are identified in 5.7, but the CA is also being asked to certify environmental aspects in 5.2(a)(ii). Additionally the definition of “incident” in Annex 2 includes environmental considerations. The 5.7 requirement should use Safety and Environmental Critical Elements (SECEs) to reflect this, and clarify that they come from Safety plan in 3.4 and Environmental Protection Plan in 3.5, rather than just 3.4 for SCEs.
3. Scope of Work in 5.9(b)(ii) appears to be a validation role in addition to verification, and will require that the CA has access to the Safety Plan and Environmental Protection Plan from 3.4 and 3.5.
4. In general the timeline for a certificate granted under 5.11 would be harmonized with Class and Statutory surveys.
5. In case of a change in CA under 5.14, the new CA will require a copy of the certification plan to prepare the Scope of Work. Relevant portions of the Safety Plan and Environmental Protection Plan will also be needed if item 3 above remains as-is (i.e. responsibility to confirm the SCEs/SECEs are adequate).
6. Recommend changing “and” to “or” in 5.15(2).
7. Clarification needed in 5.16(1) on whether CA is permitted and/or required to copy the owner and/or operator in this reporting.
8. Recommend revising “any changes” to “any relevant changes” in 5.16(3) so that minor changes involving other countries need not be reported, e.g. opening or closing an office in Asia etc.
9. Since 6.1 is referring to full life cycle, is it aimed a requirement for a full Safety and Environmental Management System (SEMS) covering all aspects of operations including SCEs/SECEs, occupational health and safety, incidental discharges, etc? There is no reference to such system in 6.25 either, if that is the purpose.
10. In 5.9(b)(ii) the Concept Safety Analysis is required only for production installation, but this is not clear in 6.2.
11. Recommend revising “ice” in 6.4(3) to “sea ice or icing” (or perhaps “sea ice, icebergs, or icing”).
12. Note that free-standing blast walls do not prevent the passage of smoke.

13. Definition of freeboard should refer to the Load Line Convention in 6.12. Additionally, what is the purpose of the reference to “(ice or green water)”?
14. In 6.17 or 6.18, there should be an additional criterion that no portlights or similar openings are to be located in the columns of semisubmersibles.
15. In 7.12, has consideration been given to adopting the 2009 MODU Code helideck requirements which are very similar to the CAP 437 and are aligned with ICAO guidelines?
16. In general, there are a number of prescriptive requirements which mirror those in the IMO MODU Code, or the IACS unified requirements (UR D) which are included in Class Rules. Incorporation of some of these by reference to such standards could make this document more concise.

Regards,

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