

Spicer, Roberta (NRCAN/RNCAN)

From: David Parkes <dparkes@divercertification.com>
Sent: 19-Mar-21 12:01 PM
To: Phillips, Kim (NRCAN/RNCAN)
Subject: Comment on Draft Offshore OHS Regulations
Attachments: OHS Regs Stakeholder Comments D. Parkes.docx

Hello Kim,
Please find attached our comment on Part 33 170 (1) (b) of the draft offshore OHS regulations for your review.
Thank you for the opportunity to contribute.
Best regards,
David

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

Reviewer/Comments From: _____

David Parkes, Chief Executive Officer, Diver Certification Board of Canada

#	Section of Draft OHS Regulation	Problem with Insufficient Protection Against the Hazard	Problem Created from Technical or Commercial Perspective	Proposed solution/changes
1.	Part 33 170 (1) (b)	There is no guidance on how the contractor will prove that each member of the dive team conforms to the applicable competencies of CSA standard Z275.4.	Lack of certification by an acceptable independent third party could lead to endless debates between the contractor and the regulator as to who does or does not conform to the applicable competencies set out in CSA Group standard Z275.4.	Modify the wording of Section 170 (1) (b) to read “each member of the dive team and the pilot of any remotely operated vehicle being deployed is certified by an acceptable independent third party as conforming to the applicable competencies set out in CSA Group standard Z275.4.”
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