



July 11, 2018

Mr. Daniel Morin, M. Env.
FORRI Project Manager
Senior Policy Analyst
Offshore Petroleum Management Division
Natural Resources Canada
Daniel.morin@Canada.ca

Copy to Chris Carter chriscarter@gov.nl.ca and Kim Himmelman
Kim.Himmelman@novascotia.ca

Subject: Feedback on Revised Policy Intention for the Framework Regulations of May 2018

Dear Mr. Morin,

Thank you for the opportunity to respond to the document outlining the policy intentions of the Framework Regulations as part of the FORRI process.

We would like to provide some background on the context from which we offer comments. Technical Committee K157 on Offshore Structures is one of several technical committees working on standards development under the guidance of CSA Group. TC K157 comprises about 100 members from across Canada who serve on our Technical Committee and its Working Groups. Our members represent a broad cross-section of interests; offshore operators, engineering suppliers, academics, and research organizations. Since 2005 we have been actively working on harmonizing our Canadian offshore standards with those of the International Organization for Standardization (ISO). This is being done with the encouragement of the Standards Council of Canada, industry and regulators. The offshore oil and gas industry, operators and suppliers of engineering services is truly international. Currently we have twenty ISO offshore standards in the ISO 19900 series which have been adopted or are in the process of being adopted as National Standards of Canada, with the appellation "CAN/CSA-ISO 1990x". The appellation CAN/CSA means they are not just international standards, which may or may not be fully applicable for Canadian conditions, but have been reviewed and approved by a balanced Canadian multi-stakeholder committee through CSA's neutral consensus process. We also have a number of the members of our CSA TC on various ISO Working Groups and Technical Panels to help ensure the content of the ISO offshore standards reflect Canadian conditions and will meet Canadian requirements. The standards provide guidance on the design and assessment of offshore structures with respect to their environment. Considerable effort has gone into providing consistent structural reliability and operational safety across all the offshore standards. These standards represent best practice of the offshore operators and requirements of regulatory authorities world-wide including Canada.



It is our view that the Framework Regulatory document should provide consistent high-level statements of goals across the parts covered by the regulations and indicate direction to standards which provide means for meeting the goals. The framework document as it stands does not recognize the standards that have been developed and are being used by the offshore industry and regulators in Canada, the CAN/CSA ISO 19900 series offshore structures standards, as adopted as National Standards of Canada. The Framework Regulatory document is inconsistent, in some cases providing high level requirements and in others providing additional extensive detail. There are instances where this detailed guidance (definitions, for example) duplicates or differs with guidance in our CAN/CSA-ISO documents.

We would be please to make our suite of Canadian adopted ISO offshore standards and draft standards available to the Frontier and Offshore Regulatory Renewal Initiative.

On behalf of the TC I thank you for the opportunity of participating in the FORRI process. Let me know if we can be of further assistance.

Regards,

A handwritten signature in blue ink that reads 'Robert Frederking'.

Robert Frederking, Chair TC K157 Offshore Structures