

Natural Resources Canada  
1801 Hollis Street, Suite 700  
PO Box Station 2284, Station C  
Halifax, NS B3J 3C8

Att: Phillips, Kim (NRCan/RNCan)

Det Norske Veritas (Canada) Ltd.  
Region Americas  
Station St Johns  
121 Kelsey Drive  
Suite 200  
ST. JOHN'S NL A1B 0L2  
Canada  
Tel: +1 709 733 3131  
Fax: +1 709 733 3130  
Org. No: 87649 8098

<b>Date:</b>	<b>Our reference:</b>	<b>Your reference:</b>
2016-09-09	MRACA483/DBAM/ STS-J-5232	

**GENERAL FOLDER FOR ST JOHN'S, Id. No. STS  
Atlantic OHS Regulations Initiative Stakeholder Consultation-Follow-up**

Reference is made to your letter dated 2016-08-03.

We would like to thank-you for the opportunity to respond to the Policy Intent related to the Offshore Industry in Canada. As a Certifying Authority we have extensive experience ensuring compliance to the OSH regulations called out under Certificate of Fitness Regulations, in particular with the foreign vessels / Mobile offshore Units (MOUs) that are contracted to conduct operations under the respective Boards and Frontier and Lands.

Under Phase 1, the following are some general comments for your consideration:

- With respect to the Certificate of Fitness Regulations, it is important to have the same definitions across the other regulations, Installation Regulations and, Drilling and Production Regulations/guidelines.
- These definitions should be also aligned with International Standards, in particular IMO Codes such as SOLAS and MODU Codes. For example Living Accommodations should align with the definitions outlined in SOLAS and MODU codes for Accommodation Spaces.
- Foreign Flagged Vessels/MOUs are generally built to international codes and standards. To avoid exemptions or Regulatory Queries, international codes and standards should either be referenced or have a statement "to accept equivalent international standards". Areas where this could potentially be an issue include:
  - Ventilation Section (Regulation 65, 76) that reference ACGIH and ANSI/ASHRAE standards.
  - Lighting Section (regulation 79) that reference IESNA (Illuminating Engineering Society of North America) Lighting handbook
  - Confined Space (regulation 125) that reference CSA C22.1, Canadian Electrical Code.
  - Temporary Heat (regulation 159(3)) that reference ULC Standard ULC S508.
- The Level of Sound Section, Regulation 86a, gives references a noise survey that is performed in accordance with CSA Z107.56. The majority of the international vessels/MOUs have performed a Sound survey in other jurisdictions, such as Norway, and have implemented hearing protection

policies on the installation. Currently another Sound survey is enforced to the Canadian Standards, which may not change the result of the hearing protection policies on the installation, and would cause additional costs to the operator. Consideration, should be made if the result of a sound survey initiates hearing protection policies in different areas of the Installation.

Should you have any questions or concerns, please do not hesitate to contact our office.

Sincerely  
for Det Norske Veritas (Canada) Ltd.



Richard Kennedy  
Station Manager / Principle Surveyor

Mobile: +1 709 687 8370  
Direct: +1 709 733 3159  
Richard.Kennedy@dnvgl.com



David Bambrick  
Senior Surveyor

Mobile: +1 709 743 2267  
Direct: +1 709 733 3139  
David.Bambrick@dnvgl.com