

Phillips, Kim (NRCan/RNCan)

From: Shawn MacPhail <diving@dominiondiving.com>
Sent: Friday, October 27, 2017 8:30 AM
To: Phillips, Kim (NRCan/RNCan)
Subject: Re: Offshore Diving Stakeholder Engagement - CLOSES TODAY
Attachments: Offshore Diving Policy Feedback.pdf

Good morning Kim,

Please see attached comments.

Shawn MacPhail
Operations Manager
Diving Safety Specialist

1969-2017 48 years Serving the Marine Community

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From: "Phillips, Kim (NRCan/RNCan)"
Date: Friday, October 27, 2017 at 9:21 AM
To: "Phillips, Kim (NRCan/RNCan)"
Subject: Offshore Diving Stakeholder Engagement - CLOSES TODAY

Good morning,

Just a reminder, the comment period for the offshore diving policy intent closes today. If you haven't already done so, please forward me any feedback you would like to have considered in the ongoing development of the future regulations.

Best regards,

Kim Phillips

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Offshore Petroleum Management Division
Natural Resources Canada
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From: Phillips, Kim (NRCan/RNCan)
Sent: Thursday, October 05, 2017 9:56 AM
To: Phillips, Kim (NRCan/RNCan)
Subject: Offshore Diving Stakeholder Engagement Session

Good morning,

Thank you for attending the offshore diving stakeholder session on Monday. We appreciate the valuable feedback received during the session and look forward to receiving your written comments by October 27, 2017.

For your records, please find attached the deck that was presented at the session.

Best regards,

Kim Phillips

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General- The Proposed Policy is heavy weighted toward towards Saturation Diving Operations. While Approximately 95% of the Diving work in NL is Saturations , the opposite is true in NS with the majority of the operations Air Diving. IMCA has proven and industry guidance for the offshore and should be referred more in this document, as the CSA is restricted in applicability to offshore as this was not the intention when written.

Item	Page number	Issue	Suggest
1	9	Definitions- item C. "Specialized Dive Physician means...	No requirement to have a doctor trained in Saturation Diving Medicinal for an Air dive operation. "Completed training in the appreciate type of medicine for the type of diving to be conducted"
2	10	Dive Project Plan 1 (1) R. - ...drawings approved by a professional engineer for every lift	Most air jobs do not have an engineer onboard Non routine lifts require engineering. All lifts require a lift plan
3	11	Dive Project Plan 2 ...and participation of, divers..."	Divers are not available usually at the time of the Dive Project plan being written Change out the word diver for Dive Supervisor and or OCM and or DSS
4	14	12 Panning Requirements "...and approved by the Specialized Doctor"	To be a specialized doctor they require to be trained in Saturation Diving Techniques" Not a requirement for an Air diving program
5	15	Planning Requirements Section 20 (2) ..." a minimum of 2 dive supervisors must be in attendance at all times during active diving activities"	Unlike Saturation , the water time during an Air Dive operation is Minimal. Generally 30-40 mins in the water for a 2 hr. dive off Nova Scotia. The probability of an incident is drastically reduced due to this dive time (2.5 hrs. water time over a 12 hrs. shift). In addition to this, many members of the dive team, including the Dive lead are diving supervisors , just not appointed as such, due to limited POB onboard due to bed space issues. Remove the requirement for 4 supervisors (2 per shift) for air diving operations
6	16	Planning Requirements 26 "all members of the dive teamshall hold valid certificates issued by a certifying body acceptable to Chief Safety Offer	Certification must be by a Canadian authority, we have went through all the different possibilities over the last 35 years and this has worked the best. Diving in Canadian waters should also require a Canadian Medical, and Canadian Survival Insert the word "Canadian" ahead of certifying body
7	17	Planning Requirements Section28 (2) DMT requirements	On an air diving operations, medical treatment, unlike Saturations, is readily available with the vessels medic and rig/ platform hospital. For Air Diving operations a certain number of the divers on deck 4 out of 12= 2 per shift to ensure there is always a DMT on deck during diving ops should be the requirement. The requirement for every air diver to have a DMT is onerous and costly given the limited amount of air diving work
8	18	Planning Requirements Section37 Stand by equipment	The Bellman, due to his job requirement and no other person in the bell is required to have different diving gear Change wording to... industry standard/ Company required...?
9	18	Planning Requirements Section 38(C) Thermal and Humidity Exposure	Air diving / Saturation off Nova Scotia does not require heating systems for breathing mixtures due to warmer water conditions Insert the wording' For Saturation Diving where the possibility of freezing may occur.."
10	21	Planning Requirements Section 49 Breathing Mixtures	Statement too vague Must use industry accepted (IMCA) guidance for Gas qualities calculations