



Based on participation from across the offshore industry, the goal is to modernize the following three transitional regulations that are in place under the Part III.1 of the Accord Acts into one new OHS regulation:

1. Marine Installations and Structures Occupational Health and Safety Transitional Regulations
2. Marine Installations and Structures Transitional Regulations
3. Diving Operations Safety Transitional Regulations

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Re: Marine Installations and Structures Occupational Health and Safety Transitional Regulations		
Section:	Content/ Requirement:	Comment:
Part 1 General	<b>first aid attendant</b> means a medic or a qualified person who is a holder of an emergency first aid certificate, a standard first aid certificate, a mariner's first aid certificate or an advanced first aid certificate or of a registered nurse's certificate recognized under the laws of a province.	<i>The definition reads as being recognized only to the laws of a province. For marine vessels, STCW, flag state, or other recognized certificates should also be accepted.</i>
Part 5 Boilers and Pressure Vessels	<b>inspector</b> means a person recognized under the laws of Canada or of a province as qualified to inspect boilers, pressure vessels or piping systems or a representative of one of the organizations referred to in the definition of certifying authority in section 2 of the Newfoundland Offshore Certificate of Fitness Regulations who is qualified to perform that function.	
	<b>44</b> A person must not use a boiler, pressure vessel or piping system unless it has been inspected by an inspector in accordance with sections 47 to 49. (a) after installation; and (b) after any welding, alteration or repair is carried out on it.	<i>Subsection 45 allows for maintenance and repair by a 'qualified person', however subsection 44 requires inspection by an 'inspector' after a repair. As a marine vessel does not normally carry an inspector as defined here, it is not clear which repairs may be permitted onboard the vessel without requiring a port call for inspection.</i>  <i>Remove "." following 49</i>
	<b>45</b> Every boiler, pressure vessel and piping system in use at a workplace must be operated, maintained and repaired by a qualified person.	<i>Define "qualified person" and give consideration to a person onboard a marine vessel having training as a marine engineer.</i>
	<b>46</b> A person must not alter, interfere with or render inoperative any fitting attached to a boiler, pressure vessel or piping system except for the purpose of adjusting or testing the fitting.	<i>This section should permit regular maintenance replacement of fittings where necessary (similar to 44 above)</i>
Part 6 levels of Lighting	<b>55</b> The average level of lighting at a work position or in an area referred to in column 1 of an item of Schedule 1 must be not less than the average level set out in column 2 of that item.	<i>For marine vessels this regulation should also recognize class/flag state or other standards accepted throughout the international marine industry.</i>
Part 9 Sanitation	<b>97</b> Every employer must provide potable water for drinking, personal washing and food preparation that meets the standards set out in the <i>Guidelines for Canadian Drinking Water Quality</i> , published by Health Canada.	<i>For international vessels arriving for short duration geophysical, geotechnical or similar programs, this water test can be difficult to obtain outside of Canada. Also having the test done upon arrival in Canada requires a wait period of 1-2 weeks as water samples</i>



		<i>may have to be sent to a laboratory outside of the province. This regulation should be expanded to recognize other standards accepted throughout the international marine industry.</i>
	<b>106</b> If food is served in a workplace, the employer must adopt and implement a food safety program that is in accordance with the Guide to Food Safety published by the Canadian Food Inspection Agency.	<i>For vessels this regulation should also recognize flag state or other standards accepted throughout the international marine industry.</i>
Part 12 Protection Equipment	<b>173 (3)</b> If air is provided for the purpose of a respiratory protective device, the air must meet the standards set out in CSA Standard Z180.1, Compressed Breathing Air and Systems and the system that supplies air must be constructed, tested, operated and maintained in accordance with that standard.	<i>This regulation should also recognize flag state or other standards accepted throughout the international marine industry (e.g. BS EN12021).</i>
Part 14 Materials Handling	<b>231 (1)</b> The operation, maintenance and inspection of all draw works and associated equipment must meet the following standards: (a) API Standard RP 8B, Inspections, Maintenance, Repair and Remanufacture of Hoisting Equipment; and (b) API Standard Spec 8C, Specification for Drilling and Production Hoisting Equipment (PSL 1 and PSL 2). <b>231 2)</b> The operation, maintenance and inspection of offshore cranes must meet the standards set out in API Standard RP 2D, Operation and Maintenance of Offshore Cranes.	<i>For marine vessels this regulation should also recognize flag state or other standards accepted throughout the international marine industry (e.g. LOLER).</i>
	<b>232</b> The use and maintenance of any sling must meet the standards set out in ASME Standard B30.9, Slings.	<i>Same as above.</i>
	<b>233</b> The use and maintenance of any rigging hardware and other attachments used with materials handling equipment must meet the standards set out in ASME Standard B30.26, Rigging Hardware	<i>Same as above.</i>
Part 16 First Aid	<b>274 (1)</b> In addition to the requirements of section 273, if there are more than 30 employees and fewer than 61 employees normally working at an isolated workplace (a) a medic, who may be one of the employees, must, if reasonably practicable, be readily available in the workplace.	<i>This appears to be in contradiction with Part 16, Schedule 5 which indicates that a medic is not required until more than 60 employees are at the workplace</i>
Part 17 Safe occupancy of the Workplace	<b>298 (1)</b> A fire drill must be conducted at least once (a) every two weeks at each drilling rig, drilling unit and production facility; and (b) every 12 months at every workplace other than a workplace referred to in paragraph (a). <b>298 (2)</b> An evacuation drill must be conducted at least once (a) every week at a drilling unit and an offshore production facility; and (b) every 12 months at a workplace other than a workplace referred to in paragraph (a).	<i>This part should consider marine vessels and that drills are in accordance with flag state or international marine standards. Also refer to C-NLOPB Additional Health and Safety Requirements in the Canada-Newfoundland and Labrador Offshore Area, Part 11, Emergency Drills.</i>