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22 October 2017

Ms. Kim Phillips  
OHS Initiative Project Manager  
email: [kim.phillips@canada.ca](mailto:kim.phillips@canada.ca)

Dear Ms. Phillips,

**RE: Draft OHS & Framework Regulations – Training and Competency**

I am submitting these written comments in my capacity as the outgoing Chairman of the Diver Certification Board of Canada (DCBC). Although I have recently relinquished my position, in accordance with the term limits in our governing by-laws, for the past six years I have served as the Chairman of the sole national occupational diving certifying body in Canada.

During my tenure in office the DCBC has renewed Memoranda of Understanding (MOU) with the Canada-Newfoundland and Labrador Offshore Petroleum Board (C-NLOPB) and the Canada-Nova Scotia Offshore Petroleum Board (CNSOPB). In addition the DCBC has undergone independent audits by each OPB and ISO: the results and recommendations have validated and improved our already robust internal organization. The Board of Directors has also reviewed and updated key policies in order to improve our service to the Canadian occupational diving industry.

I emphasize as often as possible that our Board of Directors maintains a balanced representation from all parts of the underwater industry. At present 3 of 9 directors have strong and active backgrounds in the Canadian offshore diving industry, thereby ensuring that this important sector has a strong voice.

The DCBC issues certification to personnel who meet the requirements of CSA standard Z275.4, *Competency Standard for Diving, Hyperbaric Chamber, and Remotely Operated Vehicle Operations*. This standard is the foundation of our certification scheme and the Board is very pleased to see that this standard is referenced in Section 25 of the draft regulations.

I also wish to highlight the support of the entire DCBC Board for the proposal from the CEO of the DCBC, Mr David Parkes, that the word "Canadian" be added to Section 26, as in "issued by a Canadian certifying body acceptable to the CSO." It is the view of the DCBC Board that occupational diving personnel working in Canada should hold certification issued by a Canadian certification body for the following reasons:

- Only a Canadian certifying body would use the CSA Z275.4 competency standard as the basis for their certification.
- Only certification issued by a Canadian certifying body is subject to validation and verification. In this regard I emphasize that the DCBC is subject to periodic audit by both OPB's under the terms of each MOU. In addition each OPB has the authority to inspect any DCBC document related to

an application or certificate. It is difficult to see how this level of scrutiny could be achieved for certification issued by a non-Canadian body.

- For the unique Canadian category of offshore Diving Safety Specialist (DSS) only a Canadian certifying body has the necessary expertise to assess an application.

For these reasons I believe that requiring Canadian certification is in the best interests of the industry and Canada. I strongly recommend that this proposed change be included in the final regulations.

I thank you for the opportunity to submit these comments.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Chapple', with a long horizontal flourish extending to the right.

Jonathan Chapple  
LCDR RN (Ret'd), FCMI, LLB  
Vice-President