

Kimn,

Please see comments below to Atlantic Offshore Occupational Health and Safety Initiative

491. 1) All divers and supervisors shall hold current certification in standard first aid, as well as first aid oxygen administration. - "Standard first aid" and " first aid oxygen administration" should be defined and acceptable agencies or at least minimum curriculum should be identified.

491. 2 &3) "diver medical technician certificate of competence." should be defined and acceptable agencies or at least minimum curriculum should be identified.

508 The diving supervisor shall have dedicated and open two- way audible / voice communications with the bridge and other relevant operational activity personnel at all times, including in the event of total loss of power

This appears to be unfinished. What about DP alarms for dive control and ROV control in the event of DP drift or loss of DP? These would be a standard requirement.

517 1) When diving from a marine installation or structure, a risk assessment shall be carried out to establish whether there are any hazards to the divers when entering or exiting the water.
2) If no hazards are identified and where the freeboard is less than 2 metres then one or the other then one of the following can be used to deploy a diver:
a) A wet bell with a secondary system for deploying the standby diver,
b) a secured ladder that extends at least 2 metres into the water, or
c) An alternate means that affords equivalent or better protection than (a) or (b).
d) Where the risk assessment identifies potential obstructions that could be hazardous to the diver, or where the freeboard is more than 2 metres then a recovery system capable of recovering all divers must be available.

I believe that this section needs further work. The language of clause 2 is somewhat unclear. Why is a wet bell specified when a dive basket is adequate? What about secondary means for emergency recovery? Diver launch and recovery for situations with freeboard over 2 m is vague. where is requirement for redundancy? I would suggest IMCA for guidance on this aspect.

That is all that comes to mind right now. Thank you for the opportunity to provide input.

Regards,

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