CG1 COMMENTS: Canada-Newfoundland and Labrador Offshore Area Petroleum Operations Framework Regulations, Canada-Nova Scotia Offshore Area Petroleum Operations

Framework Regulations

Reviewer/Comments From:	

Comment #	Part / Title	Section Title	Section/ subsection (no spaces)	Regulation Provision Text (published in Canada Gazette, Part I)	Comment / Problem Created	Proposed solution/changes
EXAMPLE	1 Management System	Requirements	5(1)(d)	it must foster a culture of safety;	No change needed; agree with this, very important!	N/A
1.	Part 3 – COF	29 – Certification Plan	29 (3)(c & d)	All section c & d	These sections make reference to a handful of SCE requirements but is not all encompassing. Section 29(3)(b) suggests a list of SCE's are required for each Certification Plan. This should be used to outline the requirements, as it is all encompassing for the particular installation. For example, section 29(3)(d)(ii) talks about FFE, however, nowhere in these sections does it discuss LSA/Drilling, etc.	Remove 29(c) & 29(d), then amend 29(e) as follows: "any measures that the operator intends to implement to reduce safety and environmental risks to a level that is as low as reasonably practicable in respect of the design of the installation, including its systems and equipment. This includes, but is not limited to, those measures to satisfy the purposes of subsections 98, 103(5), 103(6), 111(4), 111(5), 121(1), 127(8), 130(2), 131(1), 131(2), 132(1)(a), 134(1), 135(3), 141(4) and 141(2)."
2.	Part 2 - Interpretation	Definitions	1(1)	certifying authority means the American Bureau of Shipping, Bureau Veritas, Det norske Veritas or Lloyd's Register Canada Limited. (autorité)	Lloyd's Register is referenced using it's full registered corporate entity name, while the other three organizations are listed with their more generic, non-registered entity name, I.e. the name which they are most commonly referred.	Change text to "certifying authority means the American Bureau of Shipping, Bureau Veritas, Det norske Veritas or Lloyd's Register. (autorité)"
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5.						

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