

Comments on Revised Policy Intention for the Framework Regulations

5.14(3) Change in Certifying Authority

This paragraph could create a significant commercial barrier to changing CA if the intent is to require a recertification including all design aspects as if an installation or vessel is newly entering the Canadian offshore areas. This needs to be clarified, particularly with regards to alignment with other aspects such as acceptance of mobile or transportable equipment certified by another CA.

6.12 Air Gap

Operating “without incident” is vague terminology. It should be tied to a goal such as loading on the upper structure (for air gap) or stability (for freeboard).

6.13(4) Motion Response and Stability of Mobile Floating Platforms

Clarity is needed on the “second test” for mobile units: is this the second test after operating in Canada, or the second test after the construction which may be completed some time before a unit is ever deployed in Canada?

6.18 Watertight Integrity of Floating Platforms

We reiterate our earlier comment that portlights or other similar openings should not be permitted in the columns of semisubmersible units.

6.24(3) Asset Integrity

We believe that NDE is referring to critical joints and [critical] structural members, not critical joints and [all] structural members. Please confirm.

6.24(4)(f)(iii) Asset Integrity

Partial or complete dismantling and inspection intervals may be extended based on condition monitoring and data analytics. We believe this would still meet the intent of the “original design standards” and should be explicitly permitted.

7.37(3)(b) Life Saving Equipment for Offshore Installations

The intent of “features to maximize escape” is unclear. Is it maximizing capacity, maximizing accessibility, minimizing time...?