

Frontier and Offshore Regulatory Renewal Initiative (FORRI)
Proposed Policy Intentions for Phase 3 of the Framework Regulations

Comments by A. Ewida – September 5, 2017

- 1) Throughout the proposed regulatory initiative, the concept of ALARP is entrenched. This is a proven practice in the UK and would allow the operator to select the method that is best for them, thus promoting innovation and continuous improvement. However, to implement and administer this concept, along with the overall performance based approach, judgement will be required. In my view, to succeed in exercising judgement, the regulator and the operator should be aligned regarding performance expectations and good industry practice.
- 2) Further, since the proposed draft regulation will be administered by various federal and provincial government departments across different jurisdictions, consistency in applying this regulation should be assured.
- 3) Accordingly, to ensure alignment and consistency, consideration may be given to the establishment of an advisory regulatory group (representing all jurisdictions) to provide guidance and clarifications in this regard, specifically during the initial stages of implementation. Further, a guidance document shared, and discussed, with the key stakeholders (e.g. regulators, operators, standards organizations, and the public) would also be beneficial.
- 4) Throughout the proposed regulatory initiative, the word “foreseeable” is frequently used. To ensure sound structural design and asset integrity, I suggest clarifying the meaning of this word in the context of design and operating loads as well as structural damages.
- 5) In Section 6.9, the proposed regulatory initiative requires the use of CAN/CSA-Z662-15 for oil and gas pipeline systems. However, throughout the document, it appears that there are no references given to any other specific CSA codes and standards that may be applicable to the installations, facilities and equipment. It would be beneficial if clarification is provided in this regard.
- 6) Due to the subjective nature of performance based regulations, a conflict resolution process supported by a roadmap for decision making may be warranted. This may be included in the above-mentioned guidance document.

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