



September 14, 2017

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Copy to Fred Allen fredallen@gov.nl.ca and Kim Himmelman
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Subject: Feedback on Phase 3 policy intent FORRI Framework Regulations

Dear Mr. Morin,

Thank you for the opportunity to respond to the document outlining the policy intentions presented in the third phase of the Framework Regulations as part of the FORRI process.

We would like to provide some background on the context from which we offer comments. Technical Committee K157 on Offshore Structures is one of several technical committees working on standards development under the guidance of CSA Group. TCK157 comprises about 100 members who serve on our Technical Committee and its Working Groups. Since 2005 we have been actively working on harmonizing our Canadian offshore standards with those of the International Organization for Standardization (ISO). This is being done with the encouragement of the Standards Council of Canada, industry and regulators. The offshore oil and gas industry, operators and suppliers of engineering services is truly international. Currently we have twenty ISO offshore standards in the ISO 19900 series which have been adopted or are in the process of being developed as National Standards of Canada. We have a number of the members of our CSA TC on various ISO Working Groups and Technical Panels to ensure the content of the ISO offshore standards reflect Canadian conditions and will meet Canadian requirements. The standards provide guidance on the design and assessment of offshore structures with respect to their environment. Considerable effort has gone into providing consistent structural reliability and operational safety across all the offshore standards.

It is our view that the Framework Regulatory document should provide consistent high-level statements of goals across the parts covered by the regulations and indicate direction to standards which provide means for meeting the goals. The framework document as it stands does not recognize the standards that have been developed and are being used by the offshore industry and regulators in Canada, the ISO 19900 series offshore structures standards. Where suitable standards do not exist, annexes can be provided to the Framework Regulations to give more detailed guidance. The Framework Regulatory



document is inconsistent, in some cases providing high level requirements and in others providing additional extensive detail. There are instances where this detailed guidance duplicates or is inconsistent with guidance in other documents. An example of this is part 6.4 Physical and Environmental Conditions where ISO offshore standards already provide such guidance. There are other parts of the Framework Regulatory document where specific reference is made to other existing Regulations, 7.37 Lifesaving Equipment for Offshore Installations.

We would be please to make our suite of ISO offshore standards and draft standards available to the Frontier and Offshore Regulatory Renewal Initiative.

Several of our members have replied with specific comments, and these are included in Attachments to this letter. They have been kept anonymous but could be put in contact with you should you request.

On behalf of the TC I thank you for the opportunity of participating in the FORRI process. Let me know if we can be of further assistance.

Regards,

A handwritten signature in blue ink that reads 'Robert Frederking'.

Robert Frederking, Chair TCK157 Offshore Structures

Att. (1a, 1b, 2, 3)