



December 13, 2021

Dennis Barrington

Dear Mr. Barrington:

Re: Feedback: Proposed OHS Regulations - CG1 July 24, 2021

Thank you for submitting a response to the proposed *Canada-Newfoundland and Labrador Offshore Occupational Health and Safety Regulations* and *Canada-Nova Scotia Offshore Occupational Health and Safety Regulations* published in the *Canada Gazette*, Part I, on July 24th, 2021.

The following table summarizes your feedback and provides a response that includes clarifications and outcomes from discussions with the Governments of Newfoundland and Labrador and Nova Scotia, as well as technical advisors at the C-NLOPB and CNSOPB:

Applicable Section	Summary of Feedback/recommendation	NRCan response
Diving	The current versions of CSA Diving Standards are not competent for offshore use and reference to them will require continuous stewardship of the applicable Z275 standards, and the qualification of the Committee members making changes to them.	<ul style="list-style-type: none"> • Reference to CSA Z275.4 will be retained in the regulations; government partners believe there is value in this standard and incorporating by reference into the regulations is an approach that is consistent across Canadian provincial and federal OHS/diving regulations. • Revisions to CSA Z275.4 are underway, and are expected to include minimum training requirements consistent with the International Diving Regulators and Certifiers Forum (IDRCF). • NRCan and the C-NLOPB hold seats on the CSA diving standards committee and intend to maintain a presence.
Diving	<p>The proposed regulations shift the bulk of technical screening to the Client Diving Safety Specialist (Offshore) and the Offshore Petroleum Boards.</p> <p>This is a workable solution, but only if these parties insist on adherence to IMCA, IDRCF, and other international standards for operation within their jurisdictions.</p>	<ul style="list-style-type: none"> • No change as a result of this comment; the Accord Act establishes other administrative tools that the Boards can use in its administration and enforcement of the Act and Regulations. • These stakeholder comments were provided to the Boards for their consideration. • Additionally, the Accord Act mandates the Occupational Health and Safety Advisory Council, once established, to advise the Board, the federal Ministers of Natural Resources and Labour, and their provincial counterparts, on the administration and enforcement of OHS.



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Information on this initiative is available on the Natural Resources Canada webpage for the Atlantic Occupational Health and Safety Initiative: <https://www.nrcan.gc.ca/energy/offshore-oil-gas/18883>.

Thank you, again, for your ongoing participation and contribution to this valuable initiative. Your expertise and input have helped tremendously in establishing the new regulations.

Sincerely,

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