



December 13, 2021

Dr. Kenneth M. LeDez
Hyperbaric Medicine Service
Health Sciences Centre
300 Prince Phillip Drive
St. John's NL A1B 3V6

Dear Dr. LeDez,

Re: 2021 Gazette / offshore diving medicine

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
Regulatory Impact Analysis Statement (RIAS): Offshore Diving Safety	Inaccurate feedback that the diploma program is unlikely to be established, and that there would be no physicians with the diploma by the end of 2021, when the proposed regulations would come into force.	<ul style="list-style-type: none"> • NRCAN confirmed with the Royal College of Physicians and Surgeons of Canada that the stream-lined practice route diploma for Hyperbaric Medicine opened in March 2021 and that there are 2-3 applicants who may receive their diploma by end of 2021.
1(1)	Definition of “dive physician specialist” does not include requirement for diploma	<ul style="list-style-type: none"> • The diploma has been added to the regulations as an option for Specialized Dive Physician competency. • NRCAN holds a seat on the CSA Z275 standard series and will raise the existence of the new diploma program with that committee, for the committee’s consideration in future versions of the standard.
Diving	There should be a mechanism for ongoing expert diving medical advice to the regulators from a physician or physicians that are actually involved in provision of diving medical coverage to offshore diving operations.	<ul style="list-style-type: none"> • No change as a result of this comment; the Boards have means of soliciting diving expertise when it is required. • Additionally, the 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,

Kim Phillips
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