

Reed, Monica (NRCan/RNCan)

From: Harris, James Michael <Michael.Harris@CGG.com>
Sent: August 17, 2017 16:23
To: Phillips, Kim (NRCan/RNCan)
Cc: LaBouve, Murphy; clint, alan
Subject: RE: Atlantic OHS Initiative - Phase 2 Consultation
Attachments: Phase 2 response - CGG v1.xlsx

Kim,

Once again, we appreciated the opportunity to participate in your forum and gained a great deal of insight we did not have. Being able to engage in these conversations and understanding the stakeholders involved is very beneficial to us. We certainly would like to be considered for future discussions if you feel it appropriate.

As promised, I have attached some comments that relate to questions we had raised. If you have any questions about the contents of this document, please don't hesitate to let me know.

Thank you again for your help.

Regards,

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From: Phillips, Kim (NRCan/RNCan) [mailto:kim.phillips@canada.ca]
Sent: Friday, July 28, 2017 12:29 PM
To: Phillips, Kim (NRCan/RNCan)
Subject: Atlantic OHS Initiative - Phase 2 Consultation

Good afternoon,

Thanks to everyone who attended our in-person sessions earlier this week. Please find attached the deck that was presented. As noted in the sessions, we have extended the deadline for written comments to September 20, 2017.

Looking forward to receiving your written comments.

Thanks,

Kim Phillips

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	HOT WORK	Comments
16	All hot work activities shall require a Work Permit in accordance with Part xx (Permit to Work – previously included in Phase 1 policy intent)	<p>On board vessels and other offshore installations, there are workspaces that are dedicated as “Permit Free” zones for hot work. This is consistent with many industries and can be seen in various mature safety programs in many countries.</p> <p>References:</p> <p>CFPA-E Guideline No 12:2012 F (CFPA Europe) OSHA 29 CFR 1915.503 (OSHA US)</p> <p>The below example illustrates an area that has been designated as "Permanent Hot Work Area" or "Fixed Hot Work Area"</p> <ul style="list-style-type: none"> - <i>the construction materials must either be non-combustible or, if the materials are combustible, they must be protected by a screen;</i> - <i>the area shall at all times be kept clear of combustible materials not connected to the work being performed</i> - <i>no flammable liquids shall be handled or stored in the area and the area shall be segregated from any area which contains flammable gases;</i> - <i>the working area shall be equipped with at least one 43A 183B C-class (12kg A-B III-E) portable fire extinguisher and in addition in the immediate vicinity of the working area either another corresponding portable fire extinguisher or two 27A 144B C-class (6kg A-B III-E) portable extinguishers.</i> - <i>Requirements can vary in different countries.</i>
33	Lifting and Positioning Personnel	
	1) Materials handling equipment must not be used for hoisting or positioning a person, unless the equipment is equipped with a platform, bucket, basket or other device that is designed and certified for that purpose and is provided with a fail-safe control system that will prevent a free fall of the load that is carried. 2) The use of materials handling equipment to undertake personnel transfers must be carried out in accordance with Part XX (Personnel Transfer)	This section goes into a great deal of detail on cranes, hoists, gantry cranes and other types of lifting equipment, but when we refer to lifting of personnel, the one lifting device that appears to be missing for us is “Davits”. Davits are lifting appliances that lower/raise our small boats. We use these as a primary source of personnel transfers when operating in an area where helicopter support is unavailable. They are also used for repair/maintenance of our in-sea equipment as well as lower/raise the Fast Rescue Craft (FRC) for life saving activities. The wording is a bit vague in the documents I have seen so far. The up side is that pretty much everything referenced (weight limits, training, communications, certificates and maintenance of the equipment, etc.) is done for these devices.
73	PERSONNEL TRANSFER	
	This Part does not apply to personnel transportation by helicopter or vessel to/from/in-between a marine installation or structure.	<p>Obviously, this statement is a bit obscure. I tried to re-word it to make more sense to me (see below), but ultimately a clearer picture needs to be drawn.</p> <p><i>“This part excludes transfers of personnel by helicopter or vessel used to move personnel between shore, installation or structure. It applies to transfers of personnel from the originating transport (i.e. crew boat, support boat) to the destination (marine vessel, structure, installation, etc.).”</i></p> <p>The biggest challenge with this section is the lack of clarity on what specific types of transfers are governed by this regulation. If we assume transfer by small boat then what I see listed are all easy for us to comply with as we do that already. It is just a matter of clarifying the particular</p>