

Spicer, Roberta (NRCAN/RNCAN)

From: Butler, Trevor <Trevor.Butler@lr.org>
Sent: 19-Mar-21 4:37 PM
To: Phillips, Kim (NRCAN/RNCAN)
Subject: RE: Draft Offshore Occupational Health and Safety Regulations
Attachments: AOHSI Draft Regulations - LR Comment Form.docx

Kim,

Please find attached LR's comments on the draft regulations.

If you would like to discuss, we would welcome the opportunity.

Sincerely,

Trevor

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From: Phillips, Kim (NRCAN/RNCAN) <kim.phillips@canada.ca>
Sent: Friday, March 05, 2021 15:01
To: Phillips, Kim (NRCAN/RNCAN) <kim.phillips@canada.ca>
Subject: Draft Offshore Occupational Health and Safety Regulations
Importance: High

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Hello,

As you are aware, Natural Resources Canada, together with federal and provincial partners and regulators, have been working to develop new Occupational Health and Safety (OHS) regulations for the Canada-Newfoundland and Labrador and Canada-Nova Scotia offshore areas.

You have been identified as a key stakeholder who contributed comments in earlier phases of engagement that took place between 2016 and 2018. We are interested in obtaining your input on the draft regulations now, to ensure we

have captured all perspectives ahead of pre-publishing in *Canada Gazette*, Part I, which is anticipated in summer 2021.

To ensure the regulations are completed as quickly as possible, you will have **2 weeks** to review and provide comments by **March 19, 2021**.

Attached is a short paper that provides further detail, a copy of the draft regulations, and a template to be used for submitting your comments.

I am available in the coming weeks if you wish to discuss the regulatory process or the regulations further.

Kind Regards,

Kim Phillips
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Natural Resources Canada | Ressources naturelles Canada
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STAKEHOLDER COMMENTS ON DRAFT CANADA- NL OFFSHORE OCCUPATIONAL HEALTH AND SAFETY REGULATIONS

Reviewer/Comments From: _____

#	Section of Draft OHS Regulation	Problem with Insufficient Protection Against the Hazard	Problem Created from Technical or Commercial Perspective	Proposed solution/changes
1.	13		Section only states reporting to the CSO and not the Certifying Authority.	Wondering should this section reference the CNLOPB Incident and investigation guidelines as now it only seems accidents/incidents are only reportable to the CSO, whereas in some instances incidents are reportable to the CA as well
2.	14(2)		Again, Investigation Reports are to be sent to CSO, no mention of Certifying Authority.	Section should detail requirements to send investigation reports to the CA as well (where applicable). Similar to the comment above
3.	Part 20 Section 96(2)c	Section states that Elevators are to be inspected once every year, however, depending on the Elevator Drive, requirements could be every 6-months		Make a statement that to be inspected once every year unless stipulated by the Manufacturer to inspect more frequently.
4.	30(2)(d)(ii)		Why the different language for Nova Scotia? This will make it challenging for assets that move between jurisdictions.	Maintain current language and remove Nova Scotia alternative.
5.	N/A	Absence of content of Sections 1, 2 and 10 of Consolidated Drafting Instructions, Feb 2019		Provisions outlined in these sections need to be incorporated in the draft regulations.
6.	126(1)	No reference to CAPP Safe Lifting Practices		Refer to these recently revamped guidelines as they represent latest industry best practices
7.	General		The goal of the regulatory renewal initiative is to make the regulations goal-setting and allow Owners/Operators to define the most appropriate requirement for a particular system/equipment to meet. As the industry	Remove reference to specific regulations, codes or standards from these sections and replace with reference to 5.7 of the Framework Regulations, i.e. the Certification Plan.

STAKEHOLDER COMMENTS ON DRAFT CANADA- NL OFFSHORE OCCUPATIONAL HEALTH AND SAFETY REGULATIONS

Reviewer/Comments From: _____

			advances/evolves, specific regulations, codes and standards will be revised and/or become obsolete.	
8.				