

Reed, Monica (NRCAN/RNCAN)

From: Butler, Trevor <Trevor.Butler@lr.org>
Sent: September 22, 2017 14:53
To: Phillips, Kim (NRCAN/RNCAN)
Subject: OHS Regulations Policy Intent, Phase 2 - Comments
Attachments: OHS comments.docx

Importance: High

Kim,

As per my email of a couple days back, please see attached for our comments on the noted policy intent. Thanks for the opportunity to contribute to this important process and apologies for the slight delay in getting these comments to you.

Sincerely,
Trevor

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LR Comments: Policy Intent, OHS Regulations – Phase 2

Section	Comment/Question	Background/Justification
5, 6, 19, 27, 35, 36, 64	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.	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 advances/evolves, specific regulations, codes and standards will be revised and/or become obsolete.
20(b)	Wording for oxygen limit is unclear.	Revise wording to clearly refer to the limit being lower or upper, or an acceptable range.