

Hello Kim

Sorry this will not be as eloquent as I would like as I am currently offshore in Saudi Arabia and having a hard time opening any reference documents. My only comments would be to change the wording for the issue of how many supervisors are required in dive control. I see that it clearly states 2 during saturation diving (486 2)) then it says where breaks are required a minimum of one supervisor and one competent person. I find this vague as what happens if the supervisor needs to go off to the toilet by all other regulations he cannot leave dive control unless another supervisor signs on to the dive log. I would like to see the wording changed to saturation or continuous diving. And ensure we define continuous diving - diving operations where there is less than a 30-45 minute surface interval. That would ensure the supervisor has enough time for a comfort break and eating a meal.

I see we make reference to the CSA standards what controls does the federal government have over their policies? If they all of a sudden change their criteria and it does not align with the spirit of this initiative or is not robust enough what recourse would say the CNOPB have? I know we are trying to establish a framework for individual boards to use as a template but just want to make sure we have a template that is not full of wording that allows for all sorts of interpretation.

Again sorry I cannot reference anything to use as examples but hope you can make sense of my concerns.

Regards

Mike Graham

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**From:** Phillips, Kim (NRCan/RNCan) <[kim.phillips@canada.ca](mailto:kim.phillips@canada.ca)>

**Sent:** 08 May 2018 15:11

**To:** Phillips, Kim (NRCan/RNCan)

**Subject:** Atlantic OHS Initiative Stakeholder Engagement - Consolidated Revised Policy Intent

Good afternoon,

On behalf of the Governments of Canada, Nova Scotia and Newfoundland and Labrador, we would like to invite you to the fifth multi-stakeholder engagement session with respect to the development of new Occupational Health and Safety (OHS) regulations for the Canada-Nova Scotia and the Canada-Newfoundland and Labrador offshore areas.

Governments have been working to develop OHS regulations that will replace the transitional regulations (including transitional diving regulations) that came into force on December 31, 2014. As part of the process, we have engaged stakeholders on draft policy intent in advance of developing the regulatory text, to allow feedback to be considered in the policy intent development stage.

The Atlantic OHS Initiative partners have worked to refine the policy intent for the OHS regulations, based on feedback received from stakeholders. Please find attached the consolidated revised policy intent document.

We will be holding a stakeholder engagement session to allow for discussion on the revised policy intent. The session will be held at the following time and location:

**May 29, 2018**  
9:30 am – 2 pm

The Fluvarium  
5 Nagle's Place, St. John's NL

Web- and tele-conferencing will be offered for those who are unable to attend in person. **Please RSVP by May 22, 2018** to Kim Phillips, OHS Initiative Project Manager ([kim.phillips@canada.ca](mailto:kim.phillips@canada.ca)), indicating whether you plan to attend remotely or in person.

We look forward to seeing you at the upcoming engagement session.

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