



May 31, 2021

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Re: Responses to CAPP Member Comments on the Draft Canada-Newfoundland and Labrador Offshore Occupational Health and Safety Regulations

Thank you for submitting, on behalf of CAPP members, a collective response to the draft *Canada-Newfoundland and Labrador Offshore Occupational Health and Safety (OHS) Regulations*. This type of feedback is what will help to ensure that the new OHS regulations are effective in setting requirements that address the unique characteristics and hazards in remote marine workplace settings, providing optimal protection for the health and safety of offshore workers.

Attached is a summary of the comments and responses which include some changes that were made to the draft and clarifications to questions submitted by CAPP members, as well as the summary of comments received from all diving stakeholders. Responses to the comments are separated according to several categories in order to address them all succinctly in the responses. Government partners are available to meet in early June, if additional discussion regarding specific comments and responses are needed.

The public review and opportunity to provide written feedback on the draft regulations is expected to occur in summer 2021, when they are pre-published in [Canada Gazette Part I](#).

We will also be publishing all comments received and information on this initiative, on the Natural Resources Canada webpage for the Atlantic Occupational Health and Safety Initiative: <https://www.nrcan.gc.ca/energy/offshore-oil-gas/18883>

Sincerely,

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*Attachment: [Summary of CAPP Member Comments and Responses]
[Summary of Diving Comments and Responses]*

Summary of CAPP Member Comments and Responses

Summaries of the comments received from CAPP members are numbered below, each followed by a response from Natural Resources Canada (NRCan) 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. References below to particular sections in the regulations correspond to the consultation draft that was provided for review on March 8, 2021.

1. Policy Overlap between FORRI (Framework Regulations) and OHS

CAPP: There is overlap between FORRI and OHS. Occasionally, the OHS regulation removes flexibility provided in FORRI such as reference to specification of codes and standards and frequency of maintenance of equipment (asset integrity).

Given that stakeholders will not have the opportunity to review both FORRI and OHS in tandem we request that Natural Resources Canada and its partners review these regulations in tandem to ensure overlap is minimized in the application of the regulations.

NRCan response

The OHS and FORRI Framework regulations are established under different parts of the Accord Acts, with different regulation-making authorities and has different policy objectives. Part III.1 is very detailed and sets a number of minimum requirements, including the obligation for operators and employers to take all reasonable measures to protect the health and safety of employees and other individuals at the workplace. Parliament and the provincial legislatures provided clear and specific direction in Part III.1 on what they expected the OHS regulations to address.

Two principles objectives of the OHS Initiative is to ensure the regulations set a minimum benchmark for the health and safety of employees and other persons at offshore workplaces, and to ensure that all workplace parties have the information they require to ensure their health and safety, included what is expected of them and how they work within a workplace.

As noted in our earlier engagements on the two regulatory initiatives, the two policy intent documents were developed simultaneously and further review was needed to ensure there was no contradictions or unnecessary overlap. The policy intent that was previously shared on FORRI Framework and OHS had considerable overlap. Part III.1 outlines in detail the authority for what OHS regulations will entail, and it was clear in our review that there was some degree of encroachment by Part III regulations into Part III.1 regulations. This has been corrected. A further review will be carried out by Department of Justice, prior to the pre-publication of the FORRI Framework regulations

While there may still be topics that are similar in both regulations, the FORRI Framework regulations will focus on those topics from an operational perspective, while the OHS regulations focus on the employee safety perspective. OHS regulations may establish more stringent controls than FORRI Framework regulations where they are necessary to ensure employee health and safety.

2. Incorporating Standards by Reference in the Regulation, including “Industry Recognized Standards” or Best Practices

CAPP: Comments on certain sections related to the approach taken in the OHS regulations for incorporating standards by reference, rather than permitting the operator or a recognized classification society to select the appropriate codes and standards, and permitting others already accepted by the flag state of foreign vessels and MODUs. There was also a recommendation to recognize standards, codes and rules that were previously accepted as part of the Offshore Boards’ regulatory query (RQ) process.

Additionally, guidelines should reference industry developed documents, providing flexibility in the application, rather than when they are referenced in regulations or codes of practice.

NRCan response

As previously noted, a principle objective of the OHS Initiative is to ensure that the regulations are clear on expectations so that all workplace parties understand what is expected of them and how they work within a workplace. To achieve this, there must be a level of precision in the regulations to ensure they are unambiguous, which will allow for consistent interpretation by all workplace parties and health and safety officers. There should be no confusion at the workplace on what measures need to be in place to ensure the individual and collective health and safety of employees and other individuals at that workplace.

Incorporating standards by reference in regulation is an effective regulatory tool, and in accordance with modern regulatory practice for designing effective regulations. There are a number of benefits of incorporating standards in regulations, the most important being that it sets a clear expectation for minimum requirements. Additionally, technical standards published by recognized standard development organizations are developed by a wide breadth of knowledgeable subject matter experts and are typically reviewed and/or updated at least every five years, to reflect the most up-to-date information on the particular subject. Dynamic/ambulatory incorporation by reference of those standards in the regulations allows the regulations to remain current and evolve through successive updates of the standard.

The practice of incorporating standards and other documents by reference requires thorough review of each of those standards and other documents to ensure that the content in those documents:

- a) address the topic at hand in a manner consistent with governments’ intent and which provides clear expectations for the minimum levels of safety necessary to adequately protect the health and safety of employees;
- b) is written in language that enables enforcement; and,
- c) doesn’t sub-delegate authority to an outside party.

The draft OHS regulations are a combination of performance and outcome-based requirements, tailored specifically to the Canada-Nova Scotia and Canada-Newfoundland and Labrador offshore workplaces, referencing only the appropriate codes and standards. As noted above in (b), not all standards or other documents lend themselves well to being incorporated by reference into regulation because they are not designed as enforceable instruments. Examples of this is where the standard or

other document was written with the intention it would be used as guidance, or where the requirements are not written as mandatory requirements.

NRCan and its provincial partners acknowledge that many of the offshore workplaces work internationally and that other international standards may already be in use in these workplaces when they come to Canada. In recognition of this, conformance in several provisions is expressly permitted in the proposed Regulations. Where specified, conformance permits foreign-flagged ships and MODUs to use equipment certified to other standards as long as they meet or exceed the minimum performance requirements outlined in the specified section(s) of the standard that has been incorporated by reference into the proposed Regulations. Care has been taken to ensure only the relevant sections of a standard have been incorporated by reference, and in many cases, the elements related to 'marking' of equipment to the particular standard have been intentionally excluded from the reference to ensure that the provision remains flexible.

Substitutions (via an RQ) are not required where conformance is permitted within the regulation and the employer has determined that the equipment being used does indeed conform to the regulatory requirement. As with any regulatory requirement, a Board health and safety officer may ask the operator or employer, as the case may be, to demonstrate that what they are doing/using meets the regulatory requirements; however, governments do not expect this will be a formalized process for each instance.

Additionally, Part III.1 of the Act does not provide authority for the regulations to sub-delegate to the Boards/CSOs the authority to prescribe requirements in guidelines. Part III.1 does empower the CSO to require, in respect of OHS, codes of practice be developed or adopted by an Operator or Employer in respect of a workplace or any work or activity carried out in a workplace. Generally in OHS regimes, codes of practice are used to fill gaps where regulations do not adequately address a given topic or issue.

With these changes to the regulatory regime, some approved RQs related to standards that were previously accepted may no longer be necessary (e.g. where conformance to a standard is now explicitly permitted in the provision, where the standard has changed, or where a standard has been removed).

3. A Means for Accepting Current Arrangements in Existing Workplaces (Sections 40, 56(1)(d), 57(3)(b), 61, 62(1)(a)(i), 64, 72(b), and 104)

CAPP: Recommended that the regulations should include how existing workplaces can demonstrate equivalency for provisions with standards permitting conformance and other provisions with new specific criteria.

NRCan response

Compliance with the regulations is required upon the regulations coming into force. Operators and/or employers, as the case may be, will need to assess their workplaces to ensure compliance with the proposed regulations. In cases of potential non-compliance, operators and/or employers, as the case may be, should discuss with the Board(s) next steps. The Act empowers the CSO to permit

substitutions for requirements in the regulations where the health and safety of employees at the workplace would not be diminished¹.

Feedback on specific provisions of the draft regulations were reviewed in light of these comments, and the following changes were made:

- **56(1)(d):** regarding question on air quality standards in the accommodations, clarity was provided that the reference to the standard (ASHRAE 55) was for temperature and humidity levels only, and not that the ventilation system itself needed to be designed, constructed or installed in accordance with a particular standard.

Note, upon review of this provision, further changes were made to another standard was added to this section requiring that *thermal environment* conform to ASHRAE 55 and *ventilation rates* to ASHRAE 62.1.

- **61(c):** regarding lockers, revised provision to apply only to ‘employees at the workplace who are on rotation’ (was previously required for ‘all employees’), to ensure requirement only applies to those employees who are regulars in the workplace.

4. Sleeping Quarters, Maximum Occupancy (Section 62(3))

CAPP: In recognition of current operations’ sleeping quarter facilities, current occupancies and the difficulties that stricter restrictions on room occupancy will pose, recommend adding ‘if feasible’ or similar language that would retain the goal of achieving single room occupancy if possible.

NRCan response

The goal of ensuring that each offshore employee have privacy during their rest period remains unchanged; however, government partners recognized that this might not be possible at all times. Consequently, the following revisions have been made to the draft regulation:

- clarity provided regarding ultimate goal of providing private rooms and washrooms, where feasible
- removal of the exemption for special or extenuating circumstances
- clarification of alternative arrangements, exceeding 2 persons sleeping in room at same time, which requires advance approval by the CSO on a short term basis

5. Performance and Risk Based Maintenance and Inspection (Sections 19.89(1)(e)(i), 73(2)(a) and 81(b))

CAPP: The draft regulations outline ‘prescriptive’ requirements, and frequency limits, for maintenance and inspection of equipment. It is unrealistic to assume that all equipment used on an installation is inspected prior to each use.

¹ Section 205.069 in the *Canada–Newfoundland and Labrador Atlantic Accord Implementation Act*; Section 210.07 in the *Canada–Nova Scotia Offshore Petroleum Resources Accord Implementation Act*.

Most equipment is designed and intended to be used as a complete system and in an automatic fashion and is essentially in service at all times although may not be called into action for any reason (e.g. duty fire pumps, emergency generators, etc...).

Additionally, not all equipment requires annual inspection. 19.89 (1)(e)(i) requires "a thorough safety inspection at least one each year." There are often standards, best practices and original equipment manufacturer (OEM) requirements that govern the frequency of inspections.

Concern that pressure equipment inspections overlaps with pressure systems in the FORRI Framework Regulations, and a recommendation to introduce a provision to permit a risk based inspection program.

NRCan response

A brief visual inspection/check of equipment, machines or devices, conducted by the person using it before each use is a reasonable measure to protect their own health and safety and that of other individuals at the workplace. It is an effective practice legislated in many other industries and jurisdictions and a critical first step required in order to ensure that it is safe for use, preventing injuries and incidents from occurring.

The draft OHS regulations require that inspection be carried out in accordance with the most stringent of:

- a) manufacturer's instructions, or
- b) a standard, in the case where the regulations incorporate by reference a standard that also addresses inspection.

The draft OHS regulations also set out a minimum annual frequency for inspections on equipment, machines or devices that are used to:

- i. preserve or protect life;
- ii. that would pose a risk to the health and safety of persons at the workplace in the absence of control measures; or,
- iii. that is subject to degradation over time that could affect safety. If the manufacturer's instructions or standard specify a more frequent inspection schedule, the most stringent applies.

Risk based inspection programs may still be employed; however, the regulations will set the minimum expectations of those programs.

That said, in regard to the specific comment on emergency lighting inspection and testing, the draft provision was modified to a more goal based requirement to ensure that it is kept in working order.

Additionally, in regard to the comment that pressure equipment inspections overlaps with pressure systems in the FORRI Framework Regulations, Part III.1 provides clear regulation-making authority to prescribe requirements establishing the standard for maintenance of boiler and pressure vessels. Upon review with provincial partners, it was determined that specifying a minimum frequency for the

internal inspection of pressure equipment is a consistent approach with other federal and provincial OHS and/or technical regulations. Again, risk based inspection programs may still be employed; however, the regulations will set the minimum expectations of those programs, as they pertain to pressure equipment.

6. Diving

CAPP: Further development is desired in the Part on diving to ensure that the regulation provides clarity, consistency and can be reasonably implemented by industry and enforced by regulatory authorities. CAPP believes that additional working sessions should be conducted to address the concerns outlined in this submission.

There are many additional diving safeguards and mitigations which already exist in industry best practice references, such as CSA 275.2, IMCA D 014 and IOGP RP 411. This regulation is missing the opportunity to reference the industry practices which are relevant to the topics in this section (170), and is only drawing upon some of the mitigations.

NRCAN response

A thorough analysis of applicable diving standards and industry documents was undertaken. NRCAN agrees there is value in many of these documents; however, many are designed as guidelines and the language used would be difficult to enforce. As such, they do not lend themselves to be incorporated by reference into regulations without also including a provision to require the documents to be read as mandatory. It is NRCAN's view that requiring these documents to be read as strictly mandatory may be too limiting, and that preferred approach would be to instead specify the goals to be met and the Boards can, if they determined it needed, identify any documents that help guide the end-user in achieving the regulatory requirement.

Summary of Diving Comments and Responses

Summaries of the comments received from diving stakeholders are below, each followed by a response from Natural Resources Canada (NRCan) 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. References below to particular sections in the regulations correspond to the consultation draft Canada-Newfoundland and Labrador Offshore Occupational Health and Safety Regulations that was provided for review on March 8, 2021.

1. International Industry Diving Guidance

Stakeholders:

Multiple stakeholders suggested that international industry (IMCA) guidance should be considered in the regulatory regime. Stakeholders noted that referencing IMCA documents is one way to ensure minimums are in place and that IMCA guidance is industry developed from close to a thousand industry members and is updated every 5 year providing a measure future proofing.

NRCan response

Incorporating standards and other documents by reference in regulation is an effective regulatory tool, and in accordance with modern regulatory practice for designing effective regulations. There are a number of benefits of incorporating standards in regulations, the most important being that it sets a clear expectation for minimum requirements. Dynamic/ambulatory incorporation by reference of standards in the regulations allows the regulations to remain current and evolve through successive updates of the standard.

The practice of incorporating standards and other documents by reference requires a thorough review of each of those standards and other documents to ensure that the content in those documents:

- a) address the topic at hand in a manner consistent with governments' intent and which provides clear expectations for the minimum levels of safety necessary to adequately protect the health and safety of employees;
- b) is written in language that enables enforcement; and,
- c) does not sub-delegate authority to an outside party.

As noted above in (b), not all standards or other documents are suitable for incorporation by reference into regulation because they are not designed to be enforceable instruments. Some standards or other documents are written only with the intention to be used as guidance, and requirements within them may not be written as mandatory requirements.

We have reviewed the relevant IMCA documents and although we agree they provide value, they are not appropriate for incorporation by reference into regulations given they were written for the purpose of guidance and do not use mandatory, enforceable language.

It is likely that the C-NLOPB and CNSOPB will develop guidelines on various topical matters, including diving. Additionally, the Chief Safety Officer has power to require codes of practice be developed or adopted by operators and/or employers. Both codes of practice and board developed guidelines are instruments used within the Accord area regulatory regime that serve to guide/direct how offshore activities are undertaken. The regulations set the minimum standard that must be met and are aligned with international best practices. The Boards may choose to establish guidelines, or the CSOs may choose to require a Code of Practice, to help further supplement the regulatory regime.

2. IMO A.831(19) *Code of Safety for Dive Systems*

Stakeholders:

The conformance to IMO 831(19) *Code of safety for diving systems* does not provide sufficient level of safety for dive equipment and does little for dive plant integrity. IMO standard is outdated and incompetent when compared to IMCA standards

NRCan response

The IMO A.831(19) *Code of safety for diving systems* is currently under revision and the end result is expected to be more modern and robust than the current version. The C-NLOPB is participating in the development of the revised edition. Once published, the new version will be automatically incorporated by reference (see s.2(1) of the draft Canada-Newfoundland and Labrador Offshore Occupational Health and Safety Regulations).

As noted above, we have reviewed the relevant IMCA documents and although we believe they provide value, they are not appropriate for incorporation by reference into regulations. The Boards may choose to establish guidelines, or the CSOs may choose to require a Code of Practice, to help further supplement the regulatory regime.

3. Dive Safety Specialists

Stakeholders:

Stakeholders noted that there are two types of 'dive safety specialists' (DSS) contemplated by CSA Z275.2 *Competency standard for diving, hyperbaric chamber, and remotely operated vehicle operations*, and suggested that the use of term 'dive safety specialist' in the regulations should be clarified as 'offshore dive safety specialist'. Further, it was suggested that the role of the DSS be re-considered concerning who can fulfil it.

Multiple stakeholders expressed concern over the perceived lack of offshore representation at the CSA diving standard committees, and suggested that some mechanism be considered that would protect against the competency requirements for offshore personnel from being diluted.

NRCan response

The term 'dive safety specialist' has been retained, however, the qualifications that the dive safety specialist must meet has been clarified in the regulations to be the competencies laid out for 'offshore dive safety specialists' in CSA Z275.2. The proposed regulation was further refined to provide clarity that a DSS must not be assigned any other duties that will interfere with their ability to provide prompt advice.

NRCan, Nova Scotia Labour and Advanced Education, and both offshore Boards hold seats at the CSA diving technical committees and continue to monitor the potential changes to the diving standards, particularly as they pertain to offshore diver competencies. CSA Z275.4 is currently under revision and the provisions related to offshore diving personnel are being closely monitored to ensure they continue to reflect the minimum standard desired.

4. Dive Team Competencies**Stakeholders:**

One stakeholder noted that there is no guidance on how the dive contractor will prove to the regulator that each member of the dive team conforms to the applicable competencies of CSA standard Z275.4.

NRCan response

The employer (dive contractor) is obligated to ensure compliance with the specific competencies in the regulations and others in the Act. They need to be able to demonstrate that compliance to the regulator upon request. This is the same for all the competencies of all offshore personnel. Competency of personnel can be demonstrated in various ways, including through proof of certification.

5. Diving Physician Specialist**Stakeholders:**

Stakeholders noted the value in the future Diploma in Hyperbaric Medicine (Diving Medicine Stream), but raised concern that it is not yet fully approved/established and, as such, there are no physicians in Canada currently in possession of this diploma/qualification. Furthermore, it is unlikely the program will be established and physicians granted the diploma by the end of 2021, when the proposed offshore OHS regulations come into force.

NRCan response

Although NRCan and its provincial partners see value in recognizing the diploma program, the proposed Regulations cannot point to a program that does not currently exist. The definition of Dive Physician Specialist has been revised to mean a physician who is licensed to practice medicine in Canada who meets the competencies of a Level 3 physician set out in CSA Z275.2 *Occupational Safety*

Code for Diving Operations. Additionally, the regulations require that a diving physician specialist is readily available at all times to provide remote medical advice from location within the province where the dive activity is taking place, and to be transported to the dive site, if necessary.

6. Medical Fitness

Stakeholders:

Most DSVs entering Canadian waters have some foreign divers who have obtained their medicals within other global jurisdictions. Suggestion that a means for accepting alternative qualifications be included.

One stakeholder suggested that medical fitness to dive examinations should be limited to dive physician specialists only.

NRCan response

The draft regulations that were shared with stakeholders included this flexibility. Every diver must be certified as being medically fit by a Canadian dive physician or, where they received their medical fitness certification in a foreign jurisdiction, a Dive Physician Specialist has reviewed the foreign certification and confirmed medical fitness.

The practice for the past 30 years of offshore diving is to accept medical fitness to dive examinations/certification by a Canadian dive physician that meets the competencies set out in a level 1 physician in CSA Z275.2. Limiting dive medicals to be performed only by a dive physician specialist would serve to reduce the number of qualified physicians to a very small number (approximately two, at this point in time). The suggested approach would also be inconsistent with other federal and provincial diving regulations.

7. Saturation Time Limits

Stakeholders:

Stakeholders noted that the CSA requirement does not use mandatory language for time limits respecting saturation diving.

NRCan response

Upon review of the language in CSA Z275.2 respecting saturation time limits, it was agreed that the requirements, as written, are not enforceable. This provision was removed from the Dive Project Plan, and instead, established as a dive contractor obligation to ensure that saturation dives are not scheduled to last more than 28 days.

8. Other feedback and clarifications on interpretations and expectations

Applicable Section	Summary of Feedback/recommendation	NRCan response
163(1)(m)	Depending on how the 'primary thermal control system' is defined the requirement may be overly onerous. Would like to see clarification on the intent of this clause	This provision requires procedures be developed to address the maintenance of diver's thermal balance and comfort.
163(1)(n)	If the intent is effectively compliance to lock-out tag-out procedures then no concern with clause. If broadened to include divers working subsea then not reasonable or practical (e.g. when working with crane lifts a barrier cannot be placed between diver and crane load)	This provision requires procedures be developed to address the installation of isolations and barriers required to protect divers from contact with hazards. It is not prescribing when/how isolations or barriers must be used, although these are aspects that should be considered in the procedures.
163(1)(o)	No definition of 'vicinity'. Specify specific distance that would trigger requirement to notify.	Boards can provide clarity in guidance, if it is needed.
164(a)	SCUBA diving is infrequent but may be necessary (environmental, scientific) and would require CSO approval.	SCUBA is not presently permitted by the Boards in the Can-NS or Can-NL offshore areas, as it is deemed to not provide a high enough level of safety given offshore conditions. It will remain expressly prohibited in the proposed regulations.
164(b)	Stakeholders suggested a number of variations on 'helium-oxygen breathing mixture'.	Revised to prohibit surface-supplied diving using a breathing mixture that contains helium.
167(1) and 169(1)	Word "or" in the chapeau allows choice between parties to be consulted.	the 'or' only applies to the OIM (which is on a D&P installation) or the OCM and vessel master (on a vessel)
167(1)(a)	Emergency planning must include vessel and diving teams to work together, and the use of 'or'	Confirmed that interpretation is that all emergencies (vessel or dive system) must be addressed by the procedures, not one or the other.
167(1)(c)	A dive should be terminated if there is any loss in communication.	Revised accordingly
167(1)(i)	The reference to thrusters should be replaced with the ships propulsion system	Revised accordingly

	components and other hazards which pose a hazard to the diver and the umbilical.	
167(2)	Suggestion that 'all emergency scenarios' may be challenging, and that the clause should be restated to 'all reasonably foreseeable emergency scenarios'	Revised accordingly
168(1)(b)	Drills involving medical emergencies should involve communication with the Diving Physician Specialist. This is necessary to ensure that the drills and the outcomes are effective.	Revised accordingly
170(1)(f)	Lack of redundant communication with the diving physician.	Revised to ensure redundancy in all communications
170(1)(g)	Medical equipment and supplies not mentioned.	The requirement for first aid and medical supplies in Part 6 has been revised to ensure that for dive projects, the diving physician specialist is consulted. consultation with the dive doc under 32(1)(c)
170(1)(k)	Defined value is not applicable to most situations without calculating specific depth. Value at surface is too high for a single diver. Word "supplied" indicates it must go to the diver at all times.	Revised 'supplied' to 'available'
170(1)(r)	Current wording is vague	Boards can provide clarity in guidance, if it is needed.
170(1)(w)	When an emergency occurs it is not possible to predict the exact location of the diving physician specialist or access to printed records. There are also practical issues of access to printed records depending on when the diver joins the Dive Support Vessel and when or whether the dive physician undertakes an onsite visit to the vessel. These records need to be electronic.	Intent that was discussed and agreed upon was that a diver could carry their in-depth medical on them, to be opened in the event of an emergency by the DMT, who could then convey the necessary info to the DPS.
170(2)(a)	At least one member of the dive team at the dive site at all times holds a valid diving medical technician certificate; Problem occurs if injured diver is the DMT.	Revised to require at least one member of the dive team holding DMT certification to be on the surface at the dive site at all times during a surface supplied dive, and who is not on a mandatory rest period. For saturation programs, all dive team members must hold DMT certification.
170(2)(e)	Fails to define a minimum standard	Revised to require a minimum inside diameter of 1.524 m.

170(3)(b)	During a typical offshore dive campaign, the dedicated medic will perform the pre/post medicals. This medic typically does not have a DMT certification.	Revised to allow medical checks in surface supplied programs to be carried out by a member of the dive team who holds a diving medical technician certificate, or by a medic under the direction of the diving physician specialist
170(3)(c)	The Canadian offshore is relatively remote. The requirements for twin bell systems would provide for an increased safety margin and the ability for self-rescue.	Revised to require that at least two bells are available
170(3)(e)	The wording defines that only the Life Support Package meets the requirements of IMCA D 052. Rephrase such that Reception facility is also required to meet IMCA D 052	<p>For reasons noted in in (6), we have removed the reference to IMCA D052; however, still require a HES that includes a HRF and SPHLs that are equipped with life support package sufficient to sustain the lives of divers. Additionally, a mating trial of the SPHLs and HRF must be conducted.</p> <p>The Act requires all facilities, equipment, machines, devices, etc. are safe for their intended use, and it is expected that this equipment will be verified by a certifying authority as safe.</p>