

Kim:

Comments on the Phase 2 policy intent as follows:

1. The draft is still very prescriptive on many elements, specifically citing certain standards such as CSA, ANSI, Canadian Electrical Code and others. There are equivalent national and international standards in ISO, EN, UK, NFPA, IEC and so on. A more performance-based text where the owner/operator specifies the performance standard (as in the Phase 3 framework regulations draft) would significantly reduce the amount of regulatory queries which would be needed, particularly for foreign-built and/or foreign-flagged mobile units and vessels. This is especially important if public consultation will still be needed for OHS RQs due to the timeline involved.
2. Clause 35 identifies lifting standards and includes the publications of only two of the recognized Certifying Authorities. ABS criteria for lifting appliances are comparable, and incorporate the API and EN standards; it should therefore be included also (unless prescriptive citations are removed in accordance with #1 above).
3. We await the identification of which items will be subject to CA verification.

Please do not hesitate to contact me if you have any questions.

Regards,  
Joe

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