

Reed, Monica (NRCAN/RNCAN)

From: Moores, Guy <Moores.Guy@atlantictowing.com>
Sent: September 20, 2017 12:10
To: Phillips, Kim (NRCAN/RNCAN)
Subject: RE: Atlantic OHS Initiative - Phase 2 Consultation
Attachments: Atlantic Offshore OHS Initiative Comments 092017.docx

Hi Kim:

Please find attached comments from Atlantic Towing on the Phase 2 consultation.

We will not be sending anyone to the Diving Consultations as this is way out of our areas of expertise.

Cheers,
Guy Moores



Director of Health and Safety
Atlantic Towing
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From: Phillips, Kim (NRCAN/RNCAN) [mailto:kim.phillips@canada.ca]
Sent: Friday, July 28, 2017 2:59 PM
To: Phillips, Kim (NRCAN/RNCAN)
Subject: Atlantic OHS Initiative - Phase 2 Consultation

EXTERNAL EMAIL

Good afternoon,

Thanks to everyone who attended our in-person sessions earlier this week. Please find attached the deck that was presented. As noted in the sessions, we have extended the deadline for written comments to **September 20, 2017.**

Looking forward to receiving your written comments.

Thanks,

Kim Phillips
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Atlantic Offshore Occupational Health and Safety Initiative
Stakeholder Consultation Comments

Atlantic Towing (ATL) participated in Stakeholder Consultation Sessions held in Halifax, Nova Scotia and St John’s, Newfoundland and Labrador. We appreciate the opportunity to take part in this consultation and offer our comments for consideration. Where possible, we have referenced the applicable Point Number in the Proposed Policy Intent for Phase 2 of the Atlantic OHS Regulations.

A. Applicability

1. ATL recommends that the “Workplaces” definition, which currently excludes Supply Vessels and Standby Vessels, amongst others, be further clarified to exclude Anchor Handling Tug Supply Vessels and Multi-Purpose Supply Vessels carrying passengers or occasionally engaged in construction support activities. Our rationale for this suggestion is that all Canadian Flag vessels are already covered by a comprehensive technical and safety rule set, including
 - i. Canada shipping Act
 - ii. SOLAS (Safety of Life at Sea)
 - iii. Maritime Labour Convention
 - iv. CLC/MOHS
 - v. Class Rules covering construction and equipment standards (DNV-GL, Lloyd’s Register, ABS or BV), recognized by Transport Canada
 - vi. The IMO SPS Code, while not ratified by Canada, also provides a recognizable international technical standard for ship safety and construction (including accommodation standards, stability, etc.)
 - vii. Specifically with respect to carriage of passengers to/from oil field installations, all vessels so engaged are required to obtain a Passenger Certificate, issued by Class under the authority of Transport Canada.
2. We note that the RQ process has set a precedent for accepting international standards in lieu of the transitional regulations (C-NLOPB decisions from July, 2015 to May, 2016, for example). It would therefore seem appropriate to accept that ships in compliance with these regulations be recognized in any new OHS regulations for the Accord areas.
3. In general, we strongly recommend that overlap of regulations between rule sets be eliminated and that existing Canadian and applicable international regulations be incorporated “by reference”, to ensure currency, rather than drafting duplicate regulations which will require ongoing maintenance.

B. Notwithstanding our general remarks above, we have provided specific comments on individual points below.

Point	Comment/Recommendation
1	Definitions – “Competent person” clarify that employer determines competency
2	Definitions – “ Qualified electrical person” and is a “Competent person” with the addition to clarify that employer determines competency
16	Hot Work- Hot work approved areas need to be added. These are designated safe hot work areas that have had a Risk Assessment completed so a Hot Work Permit is not

Atlantic Offshore Occupational Health and Safety Initiative
Stakeholder Consultation Comments

	required each time.
26	Boilers and Pressure Vessels- will need to see Phase 3 draft policy intent to comment.
79	Transfer- "visibility"- what is the working limits for visibility?