



December 13, 2021

Ian White

Dear Mr. White,

**Re: Feedback: Proposed OHS Regulations - CG1 July 24, 2021**

Thank you for submitting a response to the proposed *Canada-Newfoundland and Labrador Offshore Occupational Health and Safety Regulations* and *Canada-Nova Scotia Offshore Occupational Health and Safety Regulations* published in the *Canada Gazette*, Part I, on July 24th, 2021.

The following table summarizes your feedback and provides a response 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:

Applicable Section	Summary of Feedback/recommendation	NRCan response
Diving	Remove references to CSAZ275.4-22 that do not appear to meet the needs of industry stakeholders in regards to dive team personnel; not aligned with IMCA diving guidance.	<ul style="list-style-type: none"> <li>• Reference to CSA Z275.4 will be retained in the regulations; government partners believe there is value in this standard and incorporating by reference into the regulations is an approach that is consistent across Canadian provincial and federal OHS/diving regulations.</li> <li>• Revisions to CSA Z275.4 are underway, and are expected to include minimum training requirements consistent with the International Diving Regulators and Certifiers Forum (IDRCF).</li> <li>• NRCan and the C-NLOPB hold seats on the CSA diving standards committee and intend to maintain a presence.</li> </ul>
Diving	Consider wording to give regulators the ability to address any gaps in diving categories of competency to future proof regulation.	<ul style="list-style-type: none"> <li>• No change as a result of this comment; the Accord Act establishes other administrative tools that the Boards can use in its administration and enforcement of the Act and Regulations.</li> <li>• These stakeholder comments were provided to the Boards for their consideration.</li> <li>• Additionally, the Accord Act mandates the Occupational Health and Safety</li> </ul>



		Advisory Council, once established, to advise the Board, the federal Ministers of Natural Resources and Labour, and their provincial counterparts, on the administration and enforcement of OHS.
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Information on this initiative is available on the Natural Resources Canada webpage for the Atlantic Occupational Health and Safety Initiative: <https://www.nrcan.gc.ca/energy/offshore-oil-gas/18883>

Thank you, again, for your ongoing participation and contribution to this valuable initiative. Your expertise and input have helped tremendously in establishing the new regulations.

Sincerely,

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