

**From:** Ian White [REDACTED]  
**Date:** August 23, 2021 at 3:42:27 PM ADT  
**To:** "Phillips, Kim" <kim.phillips@nrcan-rncan.gc.ca>  
**Subject:** Feedback: Proposed OHS Regulations - CG1 July 24, 2021

Hello Kim

A general comment regarding references to CSAZ275.4-22. Following a review of the Z275.4-22 draft posted online until August 1st, 2021 for public review. Based on the proposed wording several compliance concerns with categories related to the offshore industry have been identified appearing not to align with IMCA diving guidance.

**Recommendation: Remove references to CSAZ275.4-22 that do not appear to meet the needs of industry stakeholders in the following categories. Recommendation, NRCan should consider wording to give regulators the ability to address any gaps in diving categories of competency to future proof regulation. Below is a review of sections that appear to have issues.**

- Clause 10 Unrestricted Surface Supplied Diver.
- Clause 15 Offshore Air-Diving Supervisor.
- Clause 17 Closed Bell Diver.
- Clause 26 Offshore Air Diving Safety Specialist.

#### **Clause 10 Unrestricted Surface Supplied Diver**

Nitrox breathing competency not identified. Nitrox diving is a method used extensively offshore including Canada's offshore oil & gas diving industry. In-addition IMCA competency/training are outlined below.

#### **IMCA D 08/17 IMCA minimum criteria for surface supplied diver training**

Quote: "a. Surface supplied diving equipment (SSDE) Dives in a range of depths both as a diver and standby diver to a maximum depth of 50 metres and from a range of dive stations. The training must include operations **from both a cage (dive stage) and wet bell;**"  
"b. Self-contained underwater breathing apparatus (commercial SCUBA) The minimum equipment configuration for commercial SCUBA is as follows: full-face mask, bail-out cylinder, switching block, lifeline and voice communications."

#### **Z275.4-22, 10.8.4 Performance standards**

"(viii) act as a diver, tender, and standby diver while employing an open **diving bell or diving stage** on an unrestricted surface-supplied dive site; and"

Concern: Does not appear to meet minimum IMCA training and competency requirements.

### **Clause 15 Offshore air-diving supervisor**

Appears to fall 40% short of the minimum IMCA competency requirements regarding offshore experience.

**IMCA D 013 Offshore Diving Supervisor and Life Support Technician Certification Schemes Minimum Requirements for Certification.** Outlines minimum experience to qualify in the following.

#### *“4.2.1 Air Diving Supervisor*

*Having qualified as a trainee in accordance with 4.1.1 above, personnel must additionally fulfil the following minimum requirements before being appointed in writing by a diving contractor as an air diving supervisor:*

*a) Have logged at least 200 panel hours (under direct supervision) offshore on a minimum of 100 surface dives over a minimum period of 60 days (not necessarily consecutive) working as a trainee air diving supervisor”*

### **Z275.4-22 15.2 Offshore air-diving supervisor**

*“a minimum of 200 logged panel hours under direct supervision (of which 40% may be obtained supervising inshore surface-decompression diving operations) on a minimum of 100 surface dives over a minimum period of 60 working days as a trainee air-diving supervisor;”*

### **Z275.4-22 Clause 17 Closed Bell Diver**

Health & Safety concern; The Closed Bell Diver competency appears have gone through considerable change. Diving requirements outlined in all other diving categories appear to have been removed from Closed Bell Diver sections. In the previous Z275.4-12 edition Clause 17.8 and 17.9 outlined diving requirements to meet a minimum competency. There no longer appears to be requirements to dive from a Closed Bell system or saturate at depths greater than 50m in line with international IDRCF guidance Closed Bell Diver “Minimum Course Requirements” pages 27 and 28.

### **IMCA D 07/17 Diver Training Certificates – IMCA Acceptance Criteria**

Quote: “6. For saturation diver training, the training must cover the minimum course requirements contained in the International Diving Regulators and Certifiers Forum (IDRCF) document entitled Closed bell diver training.”

### **Z275.4-22, Clause 26 Offshore diving safety specialist (DSS)**

Offshore diving experience and offshore air diving supervisor qualifications not identified.

#### *“26.3.1 Unrestricted surface-supplied diving operations*

*The diving safety specialist shall*

*have at least five years’ experience as an unrestricted surface-supplied diver; have been appointed and performed as a supervisor of unrestricted surface-supplied diving in diving operations for an additional period of at least five years;”*

I hope this information has been useful to you.

Stay Safe

Ian