

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 3 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.

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

Point	Comment/Recommendation
18 1)	<i>Every employee shall be provided with a minimum consecutive 11 hours of rest in any given 24-hour period.</i> For support vessels, this statement is not in line with the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW).
87 2)	<i>Smoke hoods to protect against smoke inhalation must be provided in sleeping quarters and machinery spaces.</i> Smoke Hood should be changed to Emergency Escape Breathing Device (EEBD) and be located as per the requirements set out in PART IV: SOLAS CHAPTER II-2 Construction – Fire protection, fire detection and fire extinction,3.8.3 Emergency Escape Breathing Devices.
126 1)	Suggest adding a statement that “Drills specific to the activity” are to be conducted. OSV/PSV would not drill A and B as that is specific to an installation or drill rig.