

**CG1 COMMENTS: Canada–Newfoundland and Labrador Offshore Area Petroleum Operations Framework Regulations, Canada-Nova Scotia Offshore Area Petroleum Operations Framework Regulations**

Reviewer/Comments From: DNV Canada Ltd.

Comment #	Part / Title	Section Title	Section/ subsection (no spaces)	Regulation Provision Text (published in <i>Canada Gazette</i> , Part I)	Comment / Problem Created	Proposed solution/changes
EXAMPLE	1 Management System	Requirements	5(1)(d)	it must foster a culture of safety;	No change needed; agree with this, very important!	N/A
1.	1 Schedule 2 Definitions	Installation	1(2)	(2) In these Regulations, any reference to an installation is a reference to a drilling installation, production installation or accommodations installation and, for the purposes of Part 3, also a reference to a diving installation.	Well intervention vessels are not defined/or listed as an installation. However in the past this type of vessel/installation required a certificate of fitness to operate offshore NL. A well intervention vessel is not a drilling or production installation.	Recommend that well intervention vessels should be included as an installation.
2.	2 Authorization	Documents and Information	9	9 The application for an authorization must be accompanied by the following documents and information:.....etc.	How is well intervention being handled? Not mentioned. Is it part of the drilling program?	
3.	3 Certificate of Fitness	Prescribed installations	26	26 For the purposes of section 139.2 of the Act, a production installation, drilling installation, accommodations installation or diving installation is prescribed as an installation.	Well intervention vessel definition is missing.	Recommend that well intervention vessels should be included as an installation.
4.	3 Certificate of Fitness	Certification Plan	29(4)	(4) Paragraphs (3)(b) to (d) do not apply in the case of a diving installation.	What about a well intervention vessel? Would it apply?	Clarify applicability of well intervention vessel.
5.	3 Certificate of Fitness	Change of Certifying Authority	36(2)(b)	(2) If the person to which a certificate of fitness has been issued decides to change the certifying authority in relation to an installation, the person must....etc.	IACS Procedure PR 1A Procedure for Transfer of Class is a well known and acceptable reference that could be used for transfer of CA.	Recommend include reference as guidance note.
6.	8 Installations — Design, Transportation, Arrangement and	Exits, access and escape routes	116(1)	116 (1) An operator must ensure that, in any area where persons are normally present on an installation, there are at least two exits, each connected to an escape route, that provide safe, direct and unobstructed access	This regulation to not addressing the smaller spaces with only one exit (one door). Reference is made to DNV-OS-A101 – Safety Principles and Arrangements and complies with NORSOK Standard S-001 – Technical	Recommend clarification for small, normally occupied spaces that exist with only 1 exit (door).

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	Other Requirements			to temporary safe refuges, muster areas, embarkation stations and evacuation points, as well as the means for persons to descend to the water.	Safety. Drilling installations built to NMA requirements states that areas under 5m long or 20m2 will not require secondary exits. Example, each personnel’s cabin, laundry rooms, small work shops etc. Only 1 exit/door to these small spaces that are normally occupied, but 2escape routes available once in the corridors.	
7.	8 Systems and Equipment — Design, Installation, Commission and Other Requirements	Emergency Electrical Power Supply	123(1)(f)	(f) in the case of a floating platform, ballast systems referred to in section 140, pumps and powered watertight doors and hatches necessary to stabilize the installation; and	Ballast pumps on ship shaped units are not always fed by the emergency electrical power system. There is no class ship rule requirement for ship shaped units. From our offshore rules: For the case of a column stabilised units: Any of the ballast pumps required powered by the emergency source of power, only one of the connected pumps need be considered to be in operation at any time.	Propose that requirements for ballast pumps on emergency power is for column stabilized units only.
8.	8 Systems and Equipment — Design, Installation, Commission and Other Requirements	Mechanically Driven Generator	123(3)(b)	(b) the installation is equipped with a self-contained battery system designed to automatically supply sufficient power, on failure or shutdown of both the main electrical power supply and the emergency electrical power supply, to operate <ul style="list-style-type: none"> <li>o (i) for a period of at least one hour, the lights located in an emergency exit route, an escape route, any space where equipment incorporating an internal combustion engine, a gas turbine, an electric motor, a generator, a pump or a compressor is found, any control centre, any emergency assembly room and at every launching station of the life-saving appliances referred to in section 117,</li> <li>o (ii) for a period of at least one hour, the communication system referred to in section 125 that is used to communicate with persons on the installation and the</li> </ul>	It is stated that 1hour is required when international and class regulations is 30 minutes. Deviation will be required.	Propose to follow international standards of 30 minutes.

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				general alarm system referred to in section 126, and		
9.	8 Systems and Equipment — Design, Installation, Commission and Other Requirements	Mechanically Driven Generator	123(3)(b)(iii)	(iii) for a period of at least four days, the navigation lights and sound-signalling appliances referred to in subsection 124(1).	International requirements state only U-lights and sound signaling appliances would be fitted with UPS with a duration of 4 days. Normal ship navigation (directional) lights under COLREG would have a UPS supply or fed off emergency power in accordance with international requirements, ie less than 4 days. Deviation would be required for navigation lights. Reference is made to item 124 referring to collision regs and there is no requirement for Navigation lights to have UPS power supply for a 4 day period. Only the U-lights and sound signalling (fog horn) is required to be supplied for 96 hours.	Propose wording Morse U Lights and sound signalling appliances and remove navigation lights.
10.	8 Systems and Equipment — Design, Installation, Commission and Other Requirements	Fire Protection systems and Equipment – Fixed Fire Suppression System	130 (6)	Fixed fire suppression system (6) The operator must ensure that an automated fixed fire suppression system is installed in the accommodations area, in any hazardous area and in any other areas that require such a system based on the results of the risk assessment undertaken in accordance with subsection 106(1).	Automated fixed fire-fighting systems on latest generation drill rigs or FPSOs or even ships do not necessarily require deluge systems in the accommodations area. This is not a requirement in other jurisdictions and with other means it can be shown that accommodation sprinkler systems is not needed. This is not a requirement of class. Assume that if risk assessment is undertaken determines fixed fire suppression system is not required in accommodations area through increased design requirements for structural fire protection, ventilation systems, fire detection in all spaces, portable fire extinguishers and hydrants etc, which aligns with Class requirements, this would be accepted as compliance.	Clarification
11.	8 Systems and Equipment — Design, Installation,	Mechanical Equipment – Exceptions	132 (6)	(6) Despite paragraph (5)(b), the turbines and internal combustion engines that are critical to emergency response, including	The turbines and internal combustion engines that are critical to emergency response in many cases have shutdowns in	

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	Commission and Other Requirements			emergency generators and fire pumps, must not be equipped with the safety devices referred to in that paragraph other than the safety devices to prevent major damage from overspeeding	addition to overspeed as some operators would prefer to know their equipment is operating safely within operating ranges and to prevent major damage. Historically this has been an RQ raised on many installations.	
<b>12.</b>	Part 11 Repeals and coming into Force	Six Months after Publication	206	206 These Regulations come into force on the day that, in the sixth month after the month in which they are published in the Canada Gazette, Part II, has the same calendar number as the day on which they are published or, if that sixth month has no day with that number, the last day of that sixth month.	It should be considered that Drilling and Diving Installations with current certificate of fitness should have the ability for compliance timeline with the new FORRI Regulations to align with the first renewal of the Certificate of Fitness or allow the COF to be valid up until the installation comes back into the jurisdiction. Other owners have asked could they comply early before the regulations come into force so they don't have to go through a COF process now and then have to again mid 2023.	