

Section	Comment/Question	Background/Justification
5.4	Change title to “Qualifications and/or Limitations” and change wording to “... details of every <i>qualification and/or</i> limitation on the operation ...”	The Certificates of Fitness that LR issue all have attached a Letter of Qualifications and a Letter of Limitations. Qualifications are those items which govern the validity of a Certificate of Fitness over its duration – for example, extreme metocean limits on operation. Limitations are those items which either must not be used [i.e. a non-compliant component/equipment, or a newly added system prior to full commissioning] or those events which must take place [i.e. annual survey due date] for a Certificate of Fitness to remain valid.
5.6(2)	Change reference to 5.13 to 5.14	
5.6(3)	Change the last sentence to “... be involved in the design, construction, installation or commissioning, <i>other than as a Certifying Authority or classification body</i> , of any pending or future modifications ...”	The last sentence in this section notes that if a change of CA (transition) has been completed, and the incoming CA has had prior involvement in the design, construction, installation or commissioning, then the incoming CA cannot be involved in pending or future modifications, etc. on the installation even if their previous involvement was only in a certification/classification role. This clause would deter Operators from transitioning CAs as it would not allow the incoming CA to execute their SoW, i.e. would mean that multiple CAs would have to be engaged to provide certification, unless modified as requested.
5.7	Change the first sentence to “... a documented certification plan, <i>endorsed by the Certifying Authority</i> , to the Chief Safety Officer ...”	There cannot be a disconnect between the Owner/Operator’s intentions with respect to the suitable/relevant codes/standards to which the installation/vessel is to comply and what the Certifying Authority deems acceptable in that regard. Otherwise, completing & executing a Scope of Work may become a challenge.
5.7	Add to item (b) “... and facilities, <i>plus a description of how the associated Performance Standards are to be developed;</i> ”	A list of SCE's is required, however this list is only relevant if accompanied by the associated Performance Standards.
5.9(c)	Delete “ performance standards and related ” and add “... to the performance standards, <i>i.e. verification schemes</i> , and for ...”	Responsibility for the development of the Performance Standards rests with the Owner/Operator, to be verified by the CA, whereas the verification schemes are the responsibility of the CA.
5.13(1)a.(iii)	Add “... maintained in accordance with 5.2 <i>a(iii)</i> or that any limitations endorsed on the Certificate of Fitness have not been implemented or addressed; or ...”	It is important to ensure that the inspection and maintenance reference is separate from Limitations. There are other types of Limitations that can make the COF invalid.

5.14(3)	This paragraph is unclear. Suggest deleting in its entirety.	Regulating a transition to specific point limits the Owner/Operator to act in the best interests of the installation or vessel. Enforce the defining of a specific transition point as part of the review and approval of the transition plan.
5.16(1)a. & b.	These paragraphs are unclear. What are the definition of the terms “reports” and “formal communication” in this context?	The wording, as given, can be interpreted in many ways – which could lead to much ambiguity during the development and approval of a Scope of Work. The formal communication to the Boards related to the ongoing fitness for purpose of the installation and any associated qualifications/limitations is done through the Certificate of Fitness + associated Letters of Qualification & Limitation. Suggest removal of this clause as requirement is covered in 5.2 & 5.4 [as modified].
5.16(2)	Change wording to “... annual reports to <i>the Chief Safety Officer</i> , that include: ...”	Annual reports submitted to the Ministers are not practical – the Petroleum Boards, through the Chief Safety Officer, are the more logical recipient, as they are involved in the CA activities on an ongoing basis.
5.16(2)a.	Change wording to “... undertaken <i>within the jurisdiction of that Board</i> related ...”	Each Board only has authority within the defined boundaries of the offshore area it operates. Thus, the CA annual report should reflect those activities that occurred relevant to installations in that area. Furthermore, outside of that jurisdiction, the organization that is the CA is no longer acting in that capacity, so reporting on those activities is not deemed relevant.
5.16(3)	Change wording to “... must <i>notify the Chief Safety Officer of any changes to its organizational structure that directly affect its execution of its duties (as defined in the Scope of Work) within 30 days of that change becoming effective.</i> ”	The portion of organization that executes the CA role of those companies that are identified as CAs is, in many cases, a small part of its overall operations/activities. These global companies are continually changing and to report on all these changes, and to the Ministers, is not realistic – particularly when many of these changes have no bearing on the delivery of the CA service.
5.16(4)	Change wording to “... monthly reports to <i>the Chief Safety Officer</i> providing ...”	
5.16(7)	Change wording to “... maintain records <i>for every activity carried out in respect of the issuance and maintenance of a certificate of fitness for the period of its validity, plus seven(7) years. Where a certificate of fitness is issued as a renewal of a previous certificate of fitness, the period of validity is assumed to be calculated from the date of issuance of the original certificate of fitness to the date on which the final certificate of fitness expires.</i> ”	It is not reasonable to expect records to be maintained for an installation in perpetuity. All corporate quality management systems, as required by ISO9001, have specified document retention periods.

Parts 6 & 7 - General	Should remove ALL references to specific regulations, codes and/standards in these Parts.	5.7 requires a Certification Plan to be submitted and approved. This plan must contain reference to the pertinent regulations, Rules, codes and standards for which each aspect of the installation or vessel must meet, along with the list of SCEs and their associated performance standards. Thus, it is through the review & approval process of this plan that the proposed criteria against which the installation or vessel will be judged are agreed by all parties involved. If any party feels that a particular requirement must be implemented for a particular system, it can be captured in this plan.
7.13(3)	In the event a vessel can rotate (I.e. via a turret), is the intent to still have mechanical emergency slewing? This should be a clear requirement.	
7.13 (General)	There is no mention of personnel transfer and requirements for Cranes in this section (I.e. Aux braking systems, etc) – this should be added.	
7.31(3)	Clarification is warranted, is this section saying that non-rated equipment can be operated in a Hazardous Area as long as the system isolates and de-energizes upon Gas Detection.	NO non-rated electrical equipment is to be used in a Hazardous Area offshore during operations. Noted exception would be during planned maintenance shutdowns where proper mitigations are in place and inventories removed to make the area safe.
7.31(7)	Cargo tanks to be kept below the LEL. This section should be clarified as there are new technologies in the offshore region that allow inerting systems to work within the UEL (meaning too rich to cause a fire or explosion). This section should be reworded to allow for those types of technologies (I.e Hydrocarbon Blanketing Systems)	
7.32(5)	The Override System (inhibits or Temp Defeats) section is captured in the Emergency Shutdown Section but not in the Control (7.6) or F&G (7.30) Sections – this section should apply to all	
7.37(4)	This section should be reworded to indicate that the layout of survival craft should be based on the Risk Assessment/Concept Safety Analysis and Escape and Evacuation Analysis.	
7.37(8)	There is no mention of "enhanced" evacuation requirements such as bow thrusters or PROD's for TEMSPC's. There is a CNLOPB Interpretation Note summarizing this item. If still applicable, enhanced systems should be discussed in the Regulations.	
Annex 2 - Definitions	Change definition of "Certifying Authority" to the American Bureau of Shipping, Bureau Veritas, DNV-GL or LR.	Definition is inconsistent as it refers to a generic title for two of the CAs, but specific corporate entities for the other two.