

Attachment 1b

The following comments are based on my review of the FORRI discussion paper.

While I am quite familiar with the ISO standards for offshore structures and arctic operations (ISO 1990X, ISO 3510X series), I am not familiar with the previous Canadian regulations. My sense is that the discussion paper walks a somewhat inconsistent and awkward line between high-level requirements and details that are best left to other documents. Furthermore, a conscious effort was made to standardize the approaches to structural reliability and operational safety in the development of these ISO standards dealing with offshore structures and operations. A number of the requirements outlined in the FORRI discussion paper are inconsistent with these approaches.

With the level of detail presently included in the FORRI document, there is a significant probability that there will be conflicts with the above noted standards, which Canada has either adopted or intends to adopt in the next couple of years. My recommendation is to leave the details out of the regulations when these are adequately covered in standards that are likely to be invoked by the regulations, in favour of higher-level strategies that are consistent with the ISO standards and other standards used by the offshore industry.

Although ice management is quite important for existing offshore facilities in Canada and has been for offshore drilling programs, the FORRI document is silent on this issue.

Best regards,

Name Removed

Member of ISO working groups on General Requirements for Offshore Structures, Arctic Offshore Structures, Data Requirements for Arctic Operations, Ice Management for Arctic Operations

Member of Canadian mirror committees for Offshore Structures, Arctic Operations

Technical editor for ISO 19906, ISO 35104 and ISO 35106 standards