

Phillips, Kim (NRCAN/RNCAN)

From: delsey@cadc.ca
Sent: Tuesday, October 24, 2017 4:20 PM
To: Phillips, Kim (NRCAN/RNCAN)
Cc: dave.shanahan@csagroup.org; 'David Parkes'; 'Ian Rodd'; Bob Landry; 'Dave Geddes'; 'Vern Johnston'
Subject: CADC Comments re Offshore Diving Stakeholder Engagement Session and CSA Dive Standards invite.

Importance: High

Hello Kim,

Thank you again for the invite to participate at the recent offshore diving stakeholders session and to review the Draft Policy intent for the offshore diving regulations. Obviously a lot of time and effort has gone into the document to make it both workable and flexible without complexities.

(On an editorial note – you believe you may have a typo on page 20 stating that “Competencies must conform to CSA Z274.4” ... this should be “Z275.4”).

A key point in section 25 is the requirement for competency outlined in CSA Standard 275.4 – Competency Standard for Diving, Hyperbaric Chambers and Remotely Operated Vehicle Operations. This standard is the cornerstone for the measurement of competency of personnel in the Canadian underwater industry and is recognized in the industry as being one of the best in the world.

Further to compliance to this standard, divers in Canada (and elsewhere) are trained to the Z275.4 as a measurement of competency. Right now DCBC is the only organization in Canada certifying divers to this standard and has the infrastructure in place to do so. As such, dive companies, clients and provincial regulatory authorities citing the Z275.4 Competency Standard as a requirement, recognizes the DCBC certification as compliance to the CSA Standard.

As this offshore diving regulation is for Canadian waters, I believe that your section 26 should state that the certification body be Canadian to reflect the tremendous training, time, effort and acceptance of this standard by our industry – via our involvement and participation in the CSA to develop it for our personnel. We suggest that Section 26 say that the competency certification should be “issued by a Canadian certifying body acceptable to the CSO.” A Canadian certifying body would certify to the CAS Z275.4 Competency standard – the one recognized by our Canadian industry. It is already in place in our industry. It is the one developed by thousands of hours and millions of dollars by stakeholders in the underwater industry via the CSA Standards process. These stakeholders include regulators, users, clients and training facilities – both nationally and internationally. We all recognize it. Our Canadian divers are trained to meet the requirements. As employers of divers, CADC looks for compliance to it. Regulators look for compliance. It is our stakeholder consensus standard for competency.

On another note, the CSA Diving Standards group will be meeting in Toronto in their continuing development and revisions of the Z275 Dive Standards series on Nov 7th / 8th / 9th. Right now, several of the pertinent dive standards (Z275.4 – Competency and Z275.2 – Dive Operations) are undergoing revisions and updating. I believe that your attendance to witness the process of the standards development at the CSA may be enlightening in that many of the points that you are discussing could be incorporated and addressed in the new standards revisions and save a lot of work.

Hopefully you will consider attending the CSA Dive Standards meetings in November in Toronto. Once we all understand the goals of each organization and figure out the mechanics of it all – I am sure we can harmonize the efforts for dive safety across the country and the offshore.

Thank you again for your invite to participate in the discussion of the Offshore Diving session.

See you in Toronto next month!!!!?? ☺

Best Regards,



Doug Elsey, P.Eng.
CADC Executive Director

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From: Phillips, Kim (NRCan/RNCan) [mailto:kim.phillips@canada.ca]
Sent: October 5, 2017 8:56 AM

To: Phillips, Kim (NRCan/RNCan)

Subject: Offshore Diving Stakeholder Engagement Session

Good morning,

Thank you for attending the offshore diving stakeholder session on Monday. We appreciate the valuable feedback received during the session and look forward to receiving your written comments by October 27, 2017.

For your records, please find attached the deck that was presented at the session.

Best regards,

Kim Phillips

Senior Regulatory Officer

Offshore Petroleum Management Division

Natural Resources Canada

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