

23 October 2017

Ms. Kim Phillips
Senior Regulatory Officer
Offshore Petroleum Management Division
Natural Resources Canada
Atlantic Canada Energy Office
1801 Hollis Street, Suite 700
Halifax, NS B3J 3C8

RE: Offshore Diving Stakeholder Session re the Draft Policy Intent

Dear Ms. Phillips,

Thank you for inviting me to participate in the recent offshore diving stakeholder session in St. John's, NL. I appreciated the opportunity to study the Draft Policy Intent for offshore diving and to provide feedback from the point of view of the Diver Certification Board of Canada (DCBC), Canada's only national occupational diver certification agency.

We were pleased to see, in Section 25, the requirement that each position in the dive team must conform to the competencies outlined in CSA Z275.4 *Competency Standard for Diving, Hyperbaric Chambers and Remotely Operated Vehicle Operations*. This requirement continues the philosophy expressed by the offshore boards in their public notice re diving certificates which they issued jointly on March 7, 2003.

We were also pleased to see, in Section 26, that the boards will continue to require all members of the dive team to hold valid certificates issued by a certifying body acceptable to the Chief Safety Officer. Although this section does not specify DCBC certification, I hope that the offshore boards will continue to look for a generally acceptable "Canadian" certificate, as was stated in the public notice of March 2003.

For that reason, we suggest that the word "Canadian" be added to Section 26, as in "issued by a Canadian certifying body acceptable to the CSO." Only a Canadian certifying body would use the Canadian Standards Association's competency standard as the basis for their certification. In addition, having a Canadian body manage the certification of diving personnel would ensure that the boards would have access to all the pertinent records of all diving personnel, such as training, logged experience, and prior certifications.

Once again, thank you for allowing me to participate in the study of the Draft Policy Intent and to make this suggestion for a small but important change to Section 26.

Yours sincerely,



David G. Parkes
Chief Executive Officer