

Phillips, Kim (NRCan/RNCan)

From: Darren Aucoin <DAucoin@technip.com>
Sent: September 13, 2016 07:54
To: Phillips, Kim (NRCan/RNCan)
Subject: RE: Atlantic OHS Regulations Initiative Stakeholder Consultation - Follow-up

Hi Kim,

Here are a few comments collected from Technip Canada in addition to the comments made during the forum, and to a comment spreadsheet provided to us by a working group which you may have received by now.

REVIEW OF PHASE 1 POLICY

General Section:

- General comment – Still prescriptive to CSA standards in some areas. BS EN Standards should be put forward for acceptance. I.e. Fall Protection Equipment.

Sanitation Facilities

- 25 d: foreign vessels will not be able to have regular testing from a Canadian Lab. Additionally we are still in a position where we are unable to sail without proper results and there are long lead times for results when testing to the Canadian drinking water guidelines.

Confined Spaces

- STCW (Standard for Training, Certification and Watchkeeping) should be considered as many foreign vessels measure the competency based on drills and do not complete a formal training course.

Fall Protection

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Any questions, please let me know and we look forward to the next engagement session.

Thanks

Darren AuCoin
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