

March 10, 2023

**VIA E-MAIL**

Roger Grimes, Chair  
CNLOPB  
240 Waterford Bridge Road  
The Tower Corporate Campus – West Campus Hall  
Suite 7100  
St. John's, NL A1E 1E2

Dear Mr. Grimes,

The Canada-Newfoundland and Labrador Offshore Petroleum Board (the Board) conveyed a Board Charge to the Canada-Newfoundland and Labrador Offshore Area Occupational Health and Safety Advisory Council (the Council) regarding proposed changes to the Basic Survival Training (BST) Sea Day. Specifically, the Board requested that the Council review the information provided in the Annexes that were attached to the Charge and provide advice and recommendations regarding the quality and fidelity of conducting the BST sea-day training in a simulated pool environment to meet training and competency requirements in the Code of Practice.

The Council has reviewed the Charge and the attached Annexes, and notes that in 2019 the Canadian Association of Petroleum Producers (CAPP) Training and Qualification Committee (TQC) submitted a recommendation to the Chief Safety Officers (CSOs) of both the C-NLOPB and Canada-Nova Scotia Offshore Petroleum Board (CNSOPB) to conduct the BST and BST-r sea-days in a simulated pool environment rather than at sea. It is the Council's understanding that the CNSOPB CSO has accepted the recommendations put forward by the TQC to move forward with the option for a fully simulated sea-day for both the BST and BST-r, while the C-NLOPB CSO has concurred with the TQC recommendation that training providers be given the option to conduct sea-day exercises in the environmental pool, at sea, or a combination thereof, as it applies to BST-r but has not accepted the recommendation for initial BST for new entrants to the industry.

In order to fully understand the approach taken by the local training providers (RelyOnNutec and the Marine Institute), Council members visited the training facilities in the St. John's area to observe how training is provided in both the simulated pool environment and at sea. The Council also requested and received information from the CSOs from both the C-NLOPB and the CNSOPB that detailed their respective considerations as they took their decisions in response to the recommendations put forward by the TQC.

The Council has reviewed and considered all of the information available (as described above) and recommends that the Board accepts the amendment to the BST-r sea-day to allow the exercises to be completed in the pool environment. The Council supports the requirement for all who travel offshore to experience the ocean physically and psychologically. Therefore, in light of the movement of some of the recurrent exercises to the pool, the Council is of the opinion that all evacuation and sea-survival

exercises for the initial BST be demonstrated in the marine environment. This ensures trainees, many early in their career, will get to experience the most realistic but controlled environment at least once.

The Council recommends that the Board requests that the CAPP TQC provide greater clarity within the *Atlantic Canada Offshore Petroleum Standard Practice for the Training and Qualification of Offshore Personnel* (Standard Practice) to ensure consistency in the execution and evaluation of competencies required to be demonstrated in the real ocean environment for BST sea day. This will ensure consistency of training delivery that meets the spirit and intent of this recommendation.

We trust that with this response the Council has fulfilled the Board's expectations in regard to this Charge.

Sincerely,



Canada-Newfoundland and Labrador Offshore Area  
Occupational Health and Safety Advisory Council



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Occupational Health and Safety Advisory Council  
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Cc: The Honourable Jonathan Wilkinson, P.C., M.P.  
The Honourable Seamus O'Regan Jr.  
The Honourable Andrew Parsons, Q.C., MHA  
The Honourable Sarah Stoodley