

Chief Safety Officer Decision
(Application for Substitution, Equivalency, or Exemption)

Date: September 16, 2022

C-NLOPB Reference: 2022-RQ-0030

Applicant: Suncor Energy Inc.

Applicant Reference: RQF 313

Installation Name: Terra Nova FPSO

Authority: *Canada-Newfoundland and Labrador Atlantic Accord Implementation Act, subsection 151(1) & section 205.069*

Canada-Newfoundland and Labrador Atlantic Accord Implementation Newfoundland and Labrador Act, subsection 146(1) & section 201.66

Regulation: Section 101 (1)(b) of the *Canada – Newfoundland and Labrador Offshore Area Occupational Health and Safety Regulations*

Decision:

The Chief Safety Officer approves the Applicant's, the owner of the *Terra Nova FPSO*, use of the existing ladders for the topsides and turret modules that are approved by a Professional Engineer for ladder support spacing intervals greater than three metres and confirmed fit-for-purpose by the Certifying Authority. This approval is in lieu of the requirements of Subsection 101 (1)(b) of the Canada – Newfoundland and Labrador Offshore Area Occupational Health and Safety Regulations that specifies that any fixed ladder is to be securely held in place at the top and bottom and at intervals of not more than 3 metres. This approval is subject to the following conditions:

- 1) Fixed ladders are inspected and maintained as fit for purpose as part of the Structural Integrity Management Program for the Terra Nova FPSO and included in annual general surveys to ensure continued in-service integrity.
- 2) Suncor is to follow industry best practice with respect to the safe use of ladders.

Original signed by Paul Alexander

Chief Safety Officer