



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

**Date:** 2021-Mar-29 | 9:15:43 AM NDT

**C-NLOPB Reference:** 2021-RQ-0018

**Applicant:** Husky Energy

**Applicant Reference:** RQ-20-00000684

**Installation Name:** SeaRose 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 161(c) of the Canada – Newfoundland and Labrador Offshore Marine Installations and Structures Occupational Health and Safety Transitional Regulations*

**Decision:**

The Chief Safety Officer approves the Applicant's, the owner of the *SeaRose FPSO*, proposal to perform confined space entries without the use of the lifeline required by Subsection 161(c) of the *Canada – Newfoundland and Labrador Offshore Marine Installations and Structures Occupational Health and Safety Transitional Regulations* only when it is determined by the risk assessment process, outlined within its control of work standards, that wearing a lifeline poses a greater risk than it mitigates and the risk assessment also identifies alternate means of rescue and fall protection of personnel and communication with those personnel. Accordingly, this approval is subject to the following condition:

- 1) A confined space specific risk assessment documenting each case where it has been determined that the use of a lifeline is impractical or unsafe, and therefore will not be used, shall be attached to the associated confined space entry work permit(s). Details, including alternative means of rescue, fall protection and communication are to be identified and included. The risk assessment shall be communicated to all associated personnel, including the Emergency Response Team.

This Decision is effective from the date of issuance herein until the earlier of:

- a) the date a Regulation referenced herein is repealed or the date a particular subsection that is the object of a substitution or exemption being granted hereby is amended or replaced, or
- b) the date on which the CSO and /or CCO (as applicable) revokes this Decision as a result of i) any enforcement action by the Board related to this Decision or ii) new information or analysis coming to light challenging the assessment upon which this Decision was based, including but not limited to any changes to commitments made by the Applicant in its application.



For greater certainty, the Chief Safety Officer will no longer have authority under the Accord Acts to grant exemptions for Part III.1 transitional regulations once they are repealed.

DocuSigned by:

A handwritten signature in black ink, appearing to read "Pat Leach".

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Chief Safety Officer