

Regulatory Query Form



INTELLIX NO.:		Revision	Date	HDMS DOCUMENT NO.:
RQ-2024	-03-19-482	01	2024-March-21	WH-HSE-GM-0081
SUBJECT:	Allseas Pioneering Sr	irit – Fall P	rotection Equipment EN Marking	S

pHRQF CATEGORY	SCOPE		PRIORITY	
☐ Request for regulatory clarification	☐ Hull and Utilities	Subsea	URGENT	
☐ Application for exemption	☐ Topsides		□ ROUTINE	
Application for use of alternative,	☐ Turret / Moorings	☐ Drilling and Completions		
codes, standards or methods	☐ Installation	☐ Operations		
JURISDICTION				
□ Canada □ Classification Society □ Other				
REGULATION 1	SUE DATE 2024-March-21	AMENDMENT	2022-01-01	
Canada – Newfoundland and Labrador Offshore Area Occupational Health and Safety Regulation				
PART / DETAIL	<u> </u>			
109(1)(c) A travel restraint system that conforms to and has been selected in accordance with — and every component of which conforms to and has been selected in accordance with — all applicable CSA Group standards in the Z259 series;				
109(1)(d) A fall-arrest system that conforms to and has been selected in accordance with — and every component of which conforms to and has been selected in accordance with — all applicable CSA Group standards in the Z259 series; or				

APPLICANT'S QUERY, PROPOSAL

Use of EN Fall Protection Equipment which provides an equivalent level of safety to CSA Group Standards but does not have the CSA markings.

APPLICANT'S RATIONALE

The Allseas document (Personal Protective Equipment AlMS-COR-PRO-0613) identifies the acceptable fall protection gear for use on the vessel in section (1.4 Applicable legislation and standards).

The following EN equipment is identified:

Work Positioning Line restraint (EN 358)

Full Body Harness with trauma straps (EN 361)

Single or Double self-retracting safety line, steel wire, safety rated for sharp edges (EN 360)

(Rescue) Full body Harness fitted with front and rear attachment points and rescue lifting straps (EN 361; EN 1497)

Self-Retracting Device with Shock pack Energy Absorber (EN 360)

Twin Lanyard Shock Absorbing (EN 355)

Fall arrester with retrieval winch (EN 360; EN 1496)

The above listed equipment provides an equivalent level of safety to CSA, however, it has an EN marking instead of a CSA marking.

The BS EN rules, in additional to the vessel Working at Height Manual, provide an equivalent level of safety, which set out requirements to ensure that personnel, subjected to fall hazards, working safely at heights as detailed in the relevant CSA standards.



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COMMITMENTS BY THE OPERATOR			
N/A			

PRECEDENTS

DSV Seven Falcon - 2022-RQ-0012 Deep Explorer - 2020-RQ-0013 Fugro Synergy - 2019-RQ-0117 Audacia - 2016-RQ-0115

The Undersigned Concur in this Proposal

The officersigned Concur in this Proposar			
Allseas (Originator)	DATE:	Cenovus Energy	DATE:
		,	
HSE Advisor, Allseas		Manager, Marine	
Allseas	DATE:	Cenovus Energy	DATE:
Manager, Allseas		Director, H&S Atlantic & WWRP	

ATTACHMENTS

# T	Title	Revision/Version
1 1	N/A	
1.		