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11 January 2000

United States Coast Guard
USCG HQ
2100 2nd Street SW
Washington DC 20593
United States of America

For the attention of Lt. Diane Kalina

USCG-98-3786-82

Dear Lt. Kalina,

Commercial Diving Operations

I am writing in connection with the USCG proposed action to revise the US Commercial Diving Operations Regulations, to supplement the information sent to Joseph Jo Angelo, in response to the Advance Notice of Proposed Rulemaking, in my letter of 21st September 1998.

IMCA includes in its 150 members world-wide a number of offshore diving contractors who operate on the outer continental shelf of the USA.

This supplementary submission has been prompted by:

- i) a recent meeting between the International Marine Contractors Association (IMCA) and the Association of Diving Contractors International (ADCI) which reached agreement on an approach that should allow both organisations to work in collaboration to achieve greater alignment in the future in their respective standards and guidance for offshore diving
- ii) the progressively wider use of the IMCA International Code of Practice for Offshore Diving - driven by requirements of clients in countries where there are no detailed national regulations.
- iii) the recommendations from the US Coast Guard investigation into the events aboard Cliff Drilling rig #12 on 4 March 1996 - following the Hearing on 22-24 June 1999

On (i), I attach a copy of the agreed statement following the meeting between the two associations on 8 September 1999 - a similar announcement has been made by ADCI in the latest issue of their 'Underwater' magazine. IMCA is convinced that this alignment is only likely to be achieved if there is a separation of the requirements for offshore from those for inshore/civil diving. IMCA urges the US Coast Guard to include this feature in any revised regulations.

On (ii) and (iii), IMCA would particularly draw attention to the recommendations from the USCG investigation to amend the US regulations to:

- ◆ require back up equipment regardless of depth of dive;
- ◆ require diver-carried reserve air supply regardless of depth of dive;
- ◆ require back up personnel regardless of depth of dive;
- ◆ require that commercial divers maintain and have available a log book;
- ◆ require all commercial dive supervisors be tested and licensed.

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IMCA in its International Code of Practice for Offshore Diving includes all five requirements and would encourage the USCG to include such in any revised regulations for offshore diving. IMCA has no mandate to speak for inshore/civil diving contractors and hence makes no recommendation on requirements for such operations.

I enclose a further copy of our International Code and an updated catalogue of our publications, which lists the supporting guidance referred to in the Code. Should the US Coast Guard wish to have copies of specific documents of the three-volume composite set, this can be arranged.

IMCA is convinced that the adoption in revised regulations of the recommendations listed above from the USCG investigation into the 1996 incident would materially promote diver safety in the USA and incidentally enable US-based diving contractors to compete even more effectively for offshore diving contracts outside the USA, where such safety measures are already required.

Yours faithfully

A handwritten signature in black ink, appearing to read 'A. D. Read', written in a cursive style.

Anthony D Read
Chief Executive

Diving Division

Information Note IMCA D 17/99

October 1999

Meeting between IMCA and ADCI – Aberdeen, 8th September 1999

The Association of Diving Contractors International, Inc. (ADCI) and the International Marine Contractors Association (IMCA) have reached agreement on an approach that allows both organisations to work in collaboration in order to achieve greater alignment in the future in their respective Standards and Guidance for offshore diving.

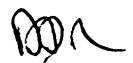
It is accepted by both organisations that the process of aligning differing standards, will be a lengthy process. Accordingly, a Workgroup is to be set up in order to develop the detail required to harmonise standards. The Workgroup will comprise of six experts from ADCI and IMCA. The terms of reference for this Workgroup have yet to be defined but will be focussed on delivery of the following:

- ◆ ADCI scheme of grading for divers for International offshore diving contracts, recognised by IMCA. The grading structure will cover the competencies for Air diving, Mixed gas diving and Bell diving.
- ◆ Development of a grandparenting scheme for existing Supervisors and Life support personnel to provide equivalency and recognition by the IMCA scheme.
- ◆ ADCI development of scheme for recognition of new Diving Supervisors for offshore diving.
- ◆ Crew size criteria for International offshore diving contracts.
- ◆ Equipment (minimum standards).
- ◆ Depth limits for various techniques.

The joint work group will endeavour to reach agreement where they can and define the differences between the ADCI and IMCA standards where this is not possible.

It is accepted that during this period of progression towards greater harmonisation IMCA will recognise ADCI divers certificates from joint ADCI/IMCA International members based in the USA on the provision that an assessment of his recorded experience with the company has been completed and available; and that a declaration to this effect is made. It is envisaged that this arrangement would stand for a period of 18 months and would be superseded by the ADCI grading scheme as prepared and agreed by the joint Workgroup.

The joint Workgroup will meet in January 2000. Members will be kept informed of progress.



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