



June 11, 2025

Jill Mackey, Chief Safety Officer
Canada-Newfoundland and Labrador Offshore Energy Regulator
240 Waterford Bridge Road
The Tower Corporate Campus – West Campus Hall
Suite 7100
St. John's, NL
A1E 1E2

RE: IRATA Standard Substitution Request
File No: 358

Dear Ms. Mackey,

Hibernia Management and Development Company Ltd. (HMDC) is requesting Chief Safety Officer temporary approval for substitution from IRATA Standard as prescribed in Section 110 (1) of the Canada–Newfoundland and Labrador Offshore Area Occupational Health and Safety Regulations. HMDC are leveraging Norwegian contractor Linjebygg to perform rope access procedures in summer 2025 to complete GBS work scope required for Asset Life Extension. Linjebygg operate under SOFT/NS9600 Certification, which offers an equivalent level of safety as the IRATA standard.

Background/Rationale

HMDC has noted that the Regulations Part 22 Fall Protection and Rope access section 110(1) specifies that rope access conforms to the IRATA International code of practice for industrial rope access. HMDC has reviewed this requirement with its GBS inspection contractor, Linjebygg, and has the following summary:

1. Linjebygg has been SOFT certified prior to 2010. SOFT is the certification body to ensure that the employer meets the expectations of Rope Access Techniques - NS9600. HMDC has confirmed that Linjebygg holds current certifications for all personnel under NS9600.
2. Linjebygg did maintain dual certification for a limited period however the majority of their Rope Access Technician's (RAT) hours are working with the SOFT system. Linjebygg has not maintained its IRATA certification since 2021.
3. In 2018-2019 The Norwegian Oil and Gas (Offshore Norway) conducted a study comparing the differences in protection levels between SOFT/NS9600 and IRATA systems.

4. Technically SOFT/NS9600 was assessed to be equivalent to IRATA International code of practice. Linjebygg executes inspection work for Gravity Based Structures in Norway under this system, thus is an acceptable system.
5. HMDC confirms that Linjebygg has a documented history of safe rope access operations under SOFT/NS9600 on similar offshore installations, and has confirmed that rescue plans, training, and safety procedures for ALE scope have been developed in accordance with NS9600. Linjebygg's rope access teams will be supervised by personnel certified under the SOFT/NS9600 for the ALE scope

IRATA and SOFT/NS9600 Comparison

- Both standards/certifications are recognized internationally
- Both have tiered structures of certification with 3 levels requiring recertification / validity every 3 years
- Both have a minimum age requirement of 18 years with comparable minimum training hours per level of certification; both require formal assessment which includes rescue competency
- Both follow ISO 22846 ensuring member companies undergo third party audits
- Both require oversight from experienced team lead (Level III certified)

Based on the Offshore Norway assessment of the two systems there is no apparent safety or administrative gap for the contractor to execute the work, they have been using this system for over 15 years. From a Human Factors Performance perspective there is likely an increase in the risk associated with the work to have Linjebygg comply with the Regulation. HMDC is seeking approval from the CSO to conduct the work under the contractors' rope access certification system per Part 22 section 110 (2).

If there are any questions, or if additional information is required, please contact [REDACTED]
[REDACTED]
[REDACTED]

Sincerely,

[REDACTED]

HMDC President

Attachments

cc: Central Files w/attachments
CNLOPB [REDACTED]
CNLOPB [REDACTED]