



July 8, 2025

**BY E-MAIL**

Duncan Fitzpatrick  
President  
Hibernia Management and Development Company Ltd.  
20 Hebron Way  
St. John's, NL, A1A 0L3

Dear Mr. Fitzpatrick:

**Subject: CSO Approval of Alternative to Section 110(2) – Use of SOFT *National Standard (NS) 9600* in lieu of Industrial Rope Access Trade Association (IRATA) *International code of practice for industrial rope access*.**

We have reviewed your letter dated June 11, 2025, and approve the proposed use of the SOFT *NS 9600* in lieu of the IRATA *International code of practice for industrial rope access* as specified by section 110(2) of the *Canada–Newfoundland and Labrador Occupational Health and Safety Regulations* for conducting a summer 2025 asset life extension work scope.

This decision is based on the operator's provision of a documented equivalency determination between the referenced standards as well as supporting information.

Please ensure that this approval letter and the CSO Approval application are provided to the Workplace Committee and posted publicly at the workplace.

Sincerely,

DocuSigned by:

A handwritten signature in black ink, appearing to read "Jill Mackey", enclosed in a blue DocuSign signature box.

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Jill Mackey

Chief Safety Officer