

# MODERNIZING CANADA'S DIVING SAFETY REGULATIONS THROUGH NATIONAL HARMONIZATION

A POLICY PROPOSAL TO ALIGN FEDERAL AND PROVINCIAL DIVING SAFETY FRAMEWORKS THROUGH ADOPTION OF CSA STANDARDS Z275.2 (DIVING OPERATIONS) AND Z275.4 (DIVER COMPETENCY).



## PROPOSAL AUTHORS

SUBMITTED BY:

CANADIAN ASSOCIATION OF DIVING CONTRACTORS (CADC)  
IN COLLABORATION WITH INDUSTRY AND REGULATORY PARTNERS

DATE: NOVEMBER 2025

CONTACT:

CANADIAN ASSOCIATION OF DIVING CONTRACTORS  
DOUG ELSEY, P.ENG (EXEC DIRECTOR) [DELSEY@CADC.CA](mailto:DELSEY@CADC.CA)

[WWW.CADC.CA](http://WWW.CADC.CA)

TEL: (905) 542-7410

# 2025

NOV 25 2025



# CANADIAN ASSOCIATION OF DIVING CONTRACTORS

---

## A NATIONAL CASE FOR THE ADOPTION OF THE CSA DIVING STANDARDS (Z275 SERIES) ACROSS CANADA

### Executive Summary:

The Canadian Association of Diving Contractors (CADDC), following extensive consultation with industry and regulatory stakeholders, proposes the **national adoption of the Canadian Standards Association (CSA) Diving Standards**—specifically **CSA Z275.1 (Hyperbaric Facilities)**, **CSA Z275.2 (Operational Safety Code for Diving Operations)**, and **CSA Z275.4 (Competency Standard for Diving Operations)**—as the uniform regulatory framework for all occupational diving activities in Canada.

This harmonized approach will **eliminate fragmented provincial and federal regulations, enhance diver safety and competency, and strengthen legal accountability under Bill C-45**. It will also **support interprovincial labour mobility** by ensuring consistent qualifications and operational standards across jurisdictions.

Adopting the CSA Z275 series—through **incorporation by reference** or **enforceable codes of practice**—will establish a **coherent, modern, and technically validated national system** that ensures safety, operational integrity, and regulatory clarity for Canada's occupational / commercial diving sector.

*To support review, CADDC has assembled a national group of subject-matter experts involved in developing and interpreting the CSA Z275 standards. This advisory body is available to provide coordinated, non-binding technical clarification to assist officials with regulatory analysis and alignment.*

Prepared by: Doug Elsey, P.Eng.  
Executive Director, CADDC  
Email: [Delsey@CADC.CA](mailto:Delsey@CADC.CA)

NOV 25 2025

## **1. PURPOSE**

This position paper presents the formal case for the national adoption and enforcement of the Canadian Standards Association (CSA) Diving Standards—specifically Z275.1 (Hyperbaric Facilities), Z275.2 (Operational Safety Code for Diving Operations), and Z275.4 (Competency Standard for Diving Operations)—as the uniform regulatory framework for all occupational diving activities in Canada. The Canadian Association of Diving Contractors (CADC) submits this to the Federal, Provincial, and Territorial Ministries of Labour and OHS authorities as part of the ongoing effort to harmonize occupational diving safety standards across jurisdictions.

## **2. BACKGROUND**

In Canada, the responsibility of regulation of occupational health and safety (OHS) responsibility is divided among 13 jurisdictions—ten provinces, three territories, and the federal government. This structure has led to 13 separate frameworks for diving operations, creating a fragmented regulatory environment for a national workforce of fewer than 2,000 professional divers. This regulatory divergence results in duplication, inconsistent enforcement, and barriers to interprovincial labour mobility.

Recognizing these inefficiencies years ago, the Canadian Association of Administrators of Labour Legislation (CAALL) established the Intergovernmental Working Group (IWG) on Harmonization in the early 1990s. One of its pilot projects was the ‘National Harmonization Project on Diving Operations’ (1997), which brought together representatives of labour, employers, and government to develop a unified national approach.

The IWG’s working group reached a consensus that the CSA Diving Standards (Z275 series) represent the technical and operational baseline necessary to ensure diver safety, competency, and enforceability. The group’s final report emphasized that compliance with detailed, prescriptive requirements—such as those in the CSA standards—was critical to diver health and safety and could not be replaced by vague performance-based measures. The working group unanimously supported the application of CSA standards across all diving sectors across all jurisdictions in Canada. Its implementation into action was fragmented at best.

## **3. THE CASE FOR NATIONAL ADOPTION**

### **3.1. Safety Imperatives**

Today, Commercial diving remains one of Canada’s highest-risk occupations. Since 1975, over 50 occupational diving fatalities have occurred—equating to approximately twenty times the fatality rate of land-based construction work. This high-risk profile stems from the

inherent hazards of underwater work: high pressure exposure, limited visibility, entrapment, hypoxia, and complex surface support requirements. The CSA Z275.2 standard establishes the operational framework necessary to mitigate these risks, specifying diver support, life-support systems, decompression procedures, and emergency recovery mechanisms.

Without consistent adoption of the CSA framework, diver safety depends on local (provincial) interpretation, often resulting in variable safety practices and inconsistent enforcement. Adoption of the CSA standards provides a scientifically validated, enforceable baseline for every jurisdiction.

### **3.2. Competency and Training Consistency**

CSA Z275.4 defines national competency standards for all diving personnel—divers, supervisors, tenders, and hyperbaric physicians—establishing objective measures for knowledge, skill, and experience. This ensures that all personnel operating within Canadian waters meet a consistent, verifiable level of competency, reducing risk and improving professionalism across the sector.

Jurisdictions that have not adopted Z275.4 face inconsistency in diver qualification and training recognition, creating barriers to employment and trade mobility. National adoption would resolve these discrepancies and align Canadian practice with international standards.

### **3.3. Regulatory Efficiency and Harmonization**

The 1997 Harmonization Project highlighted the inefficiency of maintaining 13 separate diving regulatory systems for a small workforce. The duplication of legislative drafting, enforcement interpretation, and compliance mechanisms creates administrative overhead without improving safety outcomes. Adopting the CSA standards across jurisdictions would eliminate redundancy, reduce compliance costs, and promote a coherent national enforcement regime.

CSA standards are updated on a five-year cycle through a national technical committee that includes regulators, industry, and labour, ensuring technical validity and continuous improvement. By adopting CSA standards through incorporation by reference, each jurisdiction can maintain flexibility while benefiting from a unified national update process.

### **3.4. Legal Accountability and Due Diligence**

The legal framework for workplace safety was strengthened under Bill C-45 of the Criminal Code, imposing a duty on individuals and organizations to take 'reasonable steps' to prevent bodily harm. The CSA standards provide a clear, evidence-based definition of 'reasonable steps' within the diving sector. Regulators, employers, and contractors who operate under CSA compliance can demonstrate defensible due diligence, whereas jurisdictions relying on outdated or generic provisions face ambiguity and liability exposure.

Adoption of CSA standards therefore not only improves safety but also strengthens legal accountability and provides consistent benchmarks for enforcement and judicial review.

## 4. IMPLEMENTATION FRAMEWORK

Implementation can be achieved through legislative or policy integration. The following pathways are recommended for federal and provincial authorities:

1. **\*\*Direct Incorporation by Reference\*\***: Integrate CSA Z275.1, Z275.2, and Z275.4 directly into diving-specific regulations. This provides full enforceability and clarity.
2. **\*\*Adoption Through OHS Codes or Codes of Practice\*\***: Jurisdictions using performance-based models (e.g., Alberta, Newfoundland) can reference the CSA standards within enforceable codes of practice.
3. **\*\*Regulatory Modernization\*\***: Replace outdated CSA references in jurisdictions (Z275.1-93, Z275.2-92) with the current editions (Z275.1-20, Z275.2-20, Z275.4-22) to align with modern practices and technologies.

A coordinated national working group, composed of federal and provincial regulators, CADC representatives, CSA technical experts and CAALLSOH, should be established to oversee transition planning, technical review, and compliance alignment.

## 5. EXPECTED OUTCOMES

National adoption of the CSA Z275 series will deliver measurable outcomes, including:

- Enhanced safety and reduced fatality and incident rates.
- Mutual recognition of harmonized diver credentials across provinces aiding the elimination of provincial barriers to increase labour mobility.
- Consistent enforcement and compliance verification across all jurisdictions.
- Reduced administrative costs and duplication.
- Strengthened legal and regulatory accountability under Bill C-45.
- A clear and unified benchmark for industry, regulators, and courts.

## 6. CONCLUSION

The CSA Diving Standards (Z275 series) represent the culmination of decades of collaborative technical work within Canada's diving industry. They are nationally recognized, scientifically validated, and operationally proven. Their universal adoption would establish Canada as a leader in diver safety, professional competency, and regulatory integrity. The CADC therefore urges all jurisdictions—federal, provincial, and territorial—to formally adopt the CSA Z275.1, Z275.2, and Z275.4 standards within their occupational health and safety frameworks.

This harmonized approach will eliminate fragmented regulation, enhance diver protection, and deliver a consistent, enforceable national safety standard for all Canadians working underwater.

**Prepared for submission to:**

Federal, Provincial, and Territorial Ministries of Labour  
Occupational Health and Safety Administrators  
Canadian Standards Association (CSA) Technical Committee Z275

*Recognizing the technical nature of occupational diving and anticipating questions that may arise during review, CADC has convened a national group of subject-matter experts who are directly involved in the development and interpretation of the CSA Z275 standards. This advisory body is available to support your officials by providing coordinated, non-binding technical clarification to assist with regulatory analysis, impact assessment, and alignment considerations.*

**About the Canadian Association of Diving Contractors (CADC)**

The **Canadian Association of Diving Contractors (CADC)** is the national not-for-profit organization representing Canada's commercial diving industry. Established in 1982, CADC works to promote the highest standards of safety, professionalism, and competence in underwater operations across the country. Its membership includes commercial diving contractors, offshore and inshore service providers, engineers, equipment suppliers, and supporting organizations.

CADC serves as the unified voice of the industry, working collaboratively with federal and provincial regulators, the Canadian Standards Association (CSA), and other stakeholders to advance safe work practices, improve regulatory harmonization, and uphold compliance with national diving standards—specifically **CSA Z275.2 (Occupational Safety Code for Diving Operations)** and **CSA Z275.4 (Competency Standard for Diving Personnel)**.

Through advocacy, education, and technical guidance, CADC supports its members in maintaining operational excellence and protecting the health and safety of all diving personnel working in Canadian waters.

**Contact Information:**

Doug Elsey, P.Eng – CADC Executive Director – [Delsey@cadc.ca](mailto:Delsey@cadc.ca)  
Phone: 905-542-7410  
Website: <https://www.cadc.ca>