

Q&A for Diving Safety Seminar 2022

1. Is the standby diver (rescue diver) allowed to use CSCUBA, since it's usually a rescue operation?

Yes, utilising CSCUBA would be allowed but this would depend largely on diving depth of the primary diving task in order to determine if there is sufficient air for a CSCUBA rescue to be utilised taking into account the time taking for a rescue diver to reach the stricken diver, to clear potential entanglements of the stricken diver as well as to egress the stricken diver to surface.

Prior to the primary dive, a risk assessment would have to be conducted and it would be clear then if a CSCUBA rescue would be appropriate.

2. What need to be supported if ADCI diving card does not show "international endorsement"?

If an ADCI diving card does not show "International Endorsement", the ADCI card would have to be supplemented with any other certification in the List of Acceptable Commercial Diving Certifications found here: https://www.tal.sg/wshc/-/media/tal/wshc/topics/files/commercial_diving_certifications.ashx

3. Why is MOM not doing random checks regularly of diving companies while there's commercial diving work in Singapore waters?

The Ministry of Manpower enforcement is doing their part - checks are increasing and MOM will place SWO on any diving operation found to be in breach of safe diving practices.

4. Is penalty and composition fines enough to act as a good enough deterrent for companies still using SCUBA. Wouldn't a SOW suspending operations be better?

Depending on the severity of infringements found, the Ministry of Manpower will not hesitate to issue harsher penalties such as higher composition fines, SWOs and prosecution. While the penalty framework acts as a deterrence, the diving community and its stakeholders should work towards achieving due compliance to SS511 and improve the overall safety standards of the sector.

5. Why is MOM not doing random checks regularly of diving companies while there's commercial diving work in Singapore waters?

The Ministry of Manpower enforcement are carrying out spot checks on diving operations and will continue to do so.

6. How can TWSH help our divers?

Total Workplace Safety and Health (Total WSH) is an approach that looks at safety and health together at work and the programme looks to teach companies to manage safety and health in an integrated way and educate divers and other workers alike on how to better take care of their safety and health through modular activity packages. It covers:

- safety
- occupational health and

- personal health (including both physical and mental well-being) which are often overlooked and taken for granted.

7. Incidents in 2021 is higher compare than earlier years, what change and how CDAS can help?

CDAS will continue to engage with industry and promote safe diving practices. We will intend to reach out to companies hiring diving companies to raise awareness.

8. What is the overall level of commercial diving safety standards in Singapore? Has it improved over the years?

Commercial diving safety standards has steadily improved over the years with majority of divers having undergone proper training and are holding recognised diving certificates. Within Singapore itself, we now have our 2 schools conducting MOM accredited diving courses whose certificates are recognised for work in Singapore waters.

Nonetheless, there is always room for the industry to improve and better fine tune guidelines, work processes to better fit and contextualise to local conditions.

9. With regards to competency of supervisors, are the current training/logged hours enough for a supervisor to be properly assessed as compared to IMCA requirements?

Training hour requirements to become a diving supervisor in Singapore has been reviewed by relevant authorities and have been assessed to be adequate.

Whilst we recognise IMCA certifications in Singapore, it must be noted that inland / inshore diving in Singapore is distinctly different from offshore diving that IMCA certifications primarily cover. MOM Diver / Diver supervisor course requirements remain the minimum standards to be fulfilled in order to work in Singapore waters. It remains the diving contractor (employer) to ensure any diving supervisor is competent for the work scope being carried out

10. Those CSCUBA Divers work in shipyard, they are eligible to dive out side dry dock? If answer is 'no' then what need to do?

CDAS does not see an issue with diving outside a dry dock with CSCUBA. However, should works carried out be heavy in nature such as those requiring the usage of cranes or running of hydraulics, SSDE shall be the default mode of diving.

Divers are also to ensure that they keep physically fit, healthy and sufficiently rested prior to a dive.

11. Does Diving First Aid supersede Occupational First Aid?

No. based on current SS511:2018 code of practice. Both courses are separate, and both remain a requirement until a time where these are being merged.

12. Rather than having grey areas between CSCUBA and SSDE, why not just have a blanket implementation of SSDE for all commercial diving activities?

Industry members together with governmental agencies have agreed that a certain degree of flexibility has to be granted to fit the relevant work scope to be performed. There are areas when CSCUBA can be used safely.

13. Is SCUBA allowed in dock dive? If company using SCUBA for dock diving what action will take?

No. This is not allowed. Such infringements will be met with penalties, composition fines and/or stop-work-orders from the Ministry of Manpower.

14. How to deal with main con engaging or working with non-compliance diving sub con?

You can feedback such cases to CDAS with details or directly to the Ministry of Manpower here:

<https://www.mom.gov.sg/eservices/services/report-an-infringement>

15. What can CDAS do for the diving community to improve diving safety - education, seminars, for the diving community? Every diver should go home safe every day.

CDAS is doing our best in outreach and education which you have mentioned, and we have dialogue sessions with the relevant agencies on how to better improve and fine tune standards to promote a safe work culture and environment. CDAS, however, does not function as an enforcement agency.

16. Some local and overseas agents are registered in Spore & appoint non-compliance contractors, is there any control over this?

CDAS continues our education outreach to all appointing parties.

You can however, feedback such cases to CDAS with details or directly to the Ministry of Manpower here: <https://www.mom.gov.sg/eservices/services/report-an-infringement>

17. Is it necessary to have standby diving boat besides diving Boat in emergency?

This is dependent on whether the work scope or appointing client requires this. Currently, under SS511:2018, there is no such requirement on having a standby diving boat. A project dive plan and project HAZID / risk assessment would identify the need for such additional support vessel.

18. Can't we merge OFA and DFA together? Currently limited course providers?

Based on current SS511:2018 code of practice. Both courses are separate, and both remain a requirement until a time where these are being merged. CDAS is however in dialogue with relevant agencies to explore a combination of this.

There are more than adequate OFA course providers in Singapore. For DFA, you may approach the 2 approved diving schools in Singapore to find out more.

19. Rather than having grey areas between CSCUBA and SSDE, why not just have a blanket implementation of SSDE for all commercial diving activities?

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20. MOM recognises both SS511 and SS623. a researcher can conduct liftbag lifting using scuba while CSCUBA can only carry out inspection roles?

SS511 and SS623 are very different code of practice covering differing work scopes. Both code of practices have gone through extensive review and deliberations after consulting respective industry members and have been deemed to be the most applicable standard for their respective industry.

21. Can a diving company carry out diving work if not compliant to SS511?

No. The SS511:2018 code of practice serves as guidance for the minimum standards applicable to a diving company carrying out works. Infringements to this code would be met with penalties, composition fines and/or stop-work-orders from the Ministry of Manpower.

22. Is SS511:2018 free for download?

Unfortunately, no. The SS511:2018 can be purchased from here:

<https://www.singaporestandardseshop.sg/Product/SSPdtDetail/6026442c-abd7-424c-ba74-182ce422410a>

23. Does MOM conduct checks on Aquarium diving and aquaculture diving?

MOM does conduct routine and random checks on all industries including aquarium and aquaculture.