

Proposed changes to occupational diving certificate of competence categories

CONSULTATION PAPER

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Te Kāwanatanga o Aotearoa
New Zealand Government

WORKSAFE
Mahi Haumarū Aotearoa

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1.0

How to have your say

IN THIS SECTION:

- 1.1 Making a submission
- 1.2 Use of information
- 1.3 Release of information
- 1.4 Private information

1.1 Making a submission

We want to know what you think about the proposed changes to categories in the occupational diving certificate of competency (CoC) regime.

WorkSafe New Zealand is seeking written submissions on the proposed changes on this consultation paper by **5pm on Friday 10 March 2023**. We would especially like to hear from occupational divers and diving PCBUs. This document includes several questions to guide submissions. Your submission may respond to any or all these questions. We also encourage your input on any other relevant issues.

Please include your name, the name of your organisation (if applicable), and your contact details in your submission.

You can make your submission by using the [submission form](#) and emailing your submission to: occdiving@worksafe.govt.nz

1.2 Use of information

We will use the information you provide in submissions to inform the development of risk-based categories for occupational diving CoCs. We may contact you if we require clarification of any matters you raise.

1.3 Release of information

Submissions are subject to the Official Information Act 1982. Tell us as part of your submission if you have any objection to the release of any information in the submission, which parts you consider should be withheld, and include your reasons for withholding the information (for example, commercially sensitive material). We will consider any objections you note and consult with you when responding to requests under the Act. Indicate on the front of your submission if it contains confidential information and mark the text accordingly.

1.4 Private information

The Privacy Act 2020 establishes certain principles with respect to the collection, use and disclosure of information about individuals by various agencies, including WorkSafe. Any personal information you supply to WorkSafe as part of your submission will be used in the collation of feedback to inform the development of the risk-based categories for the proposed new occupational diving CoC model. Clearly indicate in your submission if you do not wish your name to be included in any summary of submissions that we may publish.

2.0

Current situation

IN THIS SECTION:

- 2.1 Occupational diving in New Zealand
- 2.2 The certificate of competence regime for occupational divers
- 2.3 Drivers for changing the current certificate of competence categories

2.1 Occupational diving in New Zealand

Occupational diving is defined as diving that is carried out by a worker in a workplace and involves the diver breathing gases (usually air) at greater than atmospheric pressure under water.

Sections 19 and 20 of the Health and Safety at Work Act 2015 (HSWA), defines 'worker' and 'workplace' as:

19. Meaning of worker

1. In this Act, unless the context otherwise requires, a **worker** means an individual who carries out work in any capacity for a PCBU, including work as:
 - a. an employee, or
 - b. a contractor or subcontractor, or
 - c. an employee of a contractor or subcontractor, or
 - d. an employee of a labour hire company who has been assigned to work in the business or undertaking, or
 - e. an outworker (including a homemaker), or
 - f. an apprentice or a trainee, or
 - g. a person gaining work experience or undertaking a work trial, or
 - h. a volunteer worker, or
 - i. a person of a prescribed class.

20. Meaning of workplace

1. In this Act, unless the context otherwise requires, a **workplace**:
 - a. means a place where work is being carried out, or is customarily carried out, for a business or undertaking, and
 - b. includes any place where a worker goes, or is likely to be, while at work.
2. In this section, **place** includes:
 - a. a vehicle, vessel, aircraft, ship, or other mobile structure, and
 - b. any waters and any installation on land, on the bed of any waters, or floating on any waters.

Recreational diving carried out by individuals or groups for their own pleasure is not considered to be occupational diving.

Occupational diving occurs in many sectors across New Zealand's economy. There are examples of PCBU's undertaking, engaging, or contracting diving activity in tourism, construction, aquaculture, science, film, and recreational training. These diving operations range from simple single diver tasks in swimming pools to complex saturation diving performing heavy construction work on offshore oil fields with multiple divers.

2.2 The certificate of competence regime for occupational divers

Authorisation regimes (that is, licensing, registration, certificates of competence etc) have been implemented across workplace health and safety legislation to reduce the likelihood of work-related health and safety incidents inherent in particular activities. Authorisation regimes, like the Certificate of Competence (CoC) regime for occupational diving, are a key element in WorkSafe's strategy to reduce work-related fatalities, injuries, and illnesses.

They achieve this through:

- limiting entry into a market to only those applicants that satisfy specific regulatory criteria, and
- providing a level of assurance that good health and safety management practices are in place so that a high-risk activity that would otherwise be prohibited can continue without exposing people to avoidable risks to their health and safety.

The CoC regime for occupational diving is set out in the Health and Safety in Employment Regulations 1995 (the Regulations). These Regulations contain a number of sections specific to occupational diving including the requirement to apply for a CoC, the CoC application process, the issuing of a CoC, the duration of the CoC, renewal of a CoC and the obligations of an employer to occupational divers. It should be noted however that the Regulations do not set the CoC categories, rather the categories are set administratively by WorkSafe.

The current CoC categories are:

- Construction Diving (Part 1) - SCUBA to 30m
- Construction Diving (Part 2) - SSBA to 30m including underwater tools and equipment
- Construction Diving (Part 2 restricted) - SSBA to 30m where underwater tools and equipment are not required
- Construction Diving (Part 3) - SSBA to 50m and chamber operation
- Construction Diving (Part 4) - Bell diving

Further to this, there are 'limited' category CoCs for:

- aquaculture diving
- scientific diving
- film and photographic
- recreational instructor/tutor
- tourism diving.

Once issued the CoC remains valid for five years assuming the diver maintains a current medical clearance and continues to comply with all the requirements of their CoC.

There are approximately 1,350 occupational divers in New Zealand that hold CoCs in the following categories:

CATEGORY	NUMBER
Construction Diving - Part 1	452
Construction Diving - Part 2	450
Construction Diving - Part 2 Restricted	3
Construction Diving - Part 3	294
Construction Diving - Part 4	73
Aquaculture	84
Film and photographic	111
Recreational instructor/tutor	462
Scientific	192
Tourism	285

TABLE 1:
Current CoCs
by category

Note: Many occupational divers hold CoCs in multiple categories. Numbers above are correct as at 18 October 2022.

2.3 Drivers for changing the current certificate of competence categories

Since the introduction of the current CoC regime for occupational diving in 1995, the diving industry in New Zealand has grown substantially and now includes many new forms of diving, diving practices, tools, and equipment. There are many types of diving work that do not neatly fit into the current CoC categories, and the qualifications and experience required to obtain them are not common across sectors however, they have been forced to fit into the defined categories for the administrative purpose of issuing CoCs.

Consequently, in some instances the current CoC categories (and associated qualification requirements) mean that some divers have been required to undertake a significant amount of training, at considerable time and cost, when they are unlikely to use that training for the type of work they will be carrying out. Examples of this include Defence Force Divers that are required to apply for a Construction Diving – Part 1 CoC despite not undertaking that type of work or Science divers that are required to complete full scientific diver training to perform relatively simple low risk diving tasks.

Alternatively, there are examples where the current CoC categories (and associated qualification requirements) do not adequately reflect the level of risk associated with the work or recognise the additional levels of any specialist training required. Examples of this include; Navy Clearance Divers using Closed Circuit Breathing Apparatus (Rebreathers) that are not covered by any CoC category and are only required to hold an entry level Construction Diver Part 1 SCUBA CoC; Police Divers that complete Construction Diver training despite needing to learn and use additional search and recovery techniques; Helicopter Rescue (HUET) Divers that are required to apply for a Tourism Diving CoC; or Recreational Diving Instructors undertaking high-risk technical diving (Rebreathers, Mixed Gas, Cave and Wreck Diving) are only required to meet the minimum entry requirements for the more general Instructor/Tutor CoC.

A further complication is that this system unintentionally excludes certain types of equipment being used consistently across certain categories. For example, the adoption of new diving systems such as Rebreathers are excluded from Science Diving yet allowed in Instructor/Tutor and Film and Photographic categories.

WorkSafe, in consultation with the Diving Industry Advisory Group (DIAG), has reviewed the CoC categories that apply to occupational diving work and found that:

- the current categories no longer accurately reflect the types of diving work being undertaken across the industry, and
- the current assessment requirements are inconsistent across categories. Some sectors have restrictions/freedoms not permitted in other sectors undertaking equivalent or similar tasks.

3.0

Proposed change

IN THIS SECTION:

- 3.1 The proposed risk-based model for diving certificate of competence categories
- 3.2 Restricted diving category
- 3.3 General diving category
- 3.4 Occupation diving theory
- 3.5 Proposed transitional arrangements
- 3.6 Working as a diver under the proposed new model

3.1 The proposed risk-based model for diving CoC categories

WorkSafe proposes to implement a new model of categories and sub-categories for the diving CoC regime based on the level of risk associated with the type of work and equipment used. This would allow for previously unclassified dive work to be categorised more accurately and for current work types to be better delineated by the level of risk involved. This is more in line with the existing Construction Diver categories whereby the activity risk determines competency requirements.

It is envisaged that the proposed new model would encompass all occupational diving work and detail any skill competencies on the CoC, allowing contracting and/or employing PCBUs to make more informed decisions on the suitability of individuals for different levels of diving work. Furthermore, divers carrying out lower risk types of diving work would more easily be able to move between industry sectors but would also have to complete additional training and apply for additional CoC categories before being able to undertake higher-risk diving work.

This proposal splits occupational diving into two main categories – restricted diving and general diving.

3.2 Restricted diving category

The ‘restricted diving’ category would encompass higher risk activities commonly associated with the commercial and construction diving sector (that is, SSBA, Heavy tool use, machinery, decompression with chamber operations). As proposed, there will be four ‘Commercial and Construction’ categories, which largely matches the existing construction diving categories under the current CoC model, plus there would be a new ‘Military and Government’ category.

RESTRICTED DIVING CoC CATEGORY	COVERAGE OF DIVING	REQUIRED QUALIFICATIONS (or an accepted equivalent)
Commercial and Construction		
Part 1	Scuba to 30m	AS 2815.1 or HSE SCUBA
Part 2	SSBA to 30m	AS 2815.2 or HSE SSBA
Part 3	SSBA to 50m	AS 2815.3, HSE SSBA (Top up) or IMCA SSBA
Part 4	Mixed Gas Closed Bell	AS 2815.4, HSE Part II, or IMCA Bell Diver
Military and Government	Defence, Police, and Public Service border sector organisations	In accordance with NZ Defence Force Instruction 32.1 or suitable equivalent

TABLE 2:
Proposed restricted diving categories

Some proposed changes of note for the ‘restricted diving’ category are as follows:

- Construction renamed to ‘Commercial and Construction’ to more accurately reflect the range of work undertaken.
- The Part 2 (restricted) category to be removed. This category is used by a very limited number of divers in specific circumstances and would no longer be needed.
- A new category of ‘Military and Government’ diver would be created. This category would only be open to occupational divers within the NZ Defence Force, NZ Police, other Government agencies (for example, border sector organisations such as Customs or the Ministry for Primary Industries), or divers from overseas Defence, Police, or other Government agencies working in New Zealand alongside their New Zealand colleagues. Divers in this category would be working under NZ Defence Force Instruction 32.1 (NZ DFI 32.1) or similarly approved operating procedures such as *AS/NZS 2299.1:2015 Occupational diving operations – Part 1: Standard operational practice*.

Why are 'Military and Government' divers not split into separate risk levels?

NZ Defence Force and Police divers operate under strict service command and control protocols (for example, NZ DFI 32.1) with high levels of authorisation and supervision. Training for many of the specific tasks undertaken by these organisations is delivered internally (for example, mine clearance, closed circuit rebreathers, scene assessment and forensics) with internal qualifications issued and regular reassessments undertaken. A single category allows these divers to be quickly deployed in their various operational roles within their existing training and competencies

To see how the current Construction CoC Category maps to the proposed Restricted Diving categories see [Appendix C](#)

3.3 General diving category

The 'general diving' category would encompass all occupational diving work in Film and Media, Science, Recreational and Tourism, Aquaculture, Aquariums and Pools, HUET, Safety, Rescue and any other diving work that is not in the Restricted Diving category.

The new General Diving categories would be defined by the risk level of the activities being performed, rather than the previous 'sector specific' approach. The five new General Diving categories proposed are:

1. Class A - limited
2. Class B - minor
3. Class C - common
4. Class D - advanced, and
5. Class E - technical

with each covering progressively higher levels of diving risk. Divers can enter at any category and if they choose to undertake further training, move to higher levels to undertake more complex or higher risk diving. This will allow divers in the lower risk categories to undertake simple diving work while giving assurance that the more complex and higher risk diving is undertaken by more experienced divers.

The proposed new model recommends the level of qualifications required for each of the categories, giving clarity to applicants and providing greater consistency and fairness across the different diving sectors.

There are some restrictions on general diving with no SSBA, surface powered tools, surface decompression or chamber operations permitted in any of the general diving categories.

To see how the current Limited CoC Categories map to the proposed General Diving categories see [Appendix C](#)

GENERAL DIVING CoC CATEGORY	COVERAGE OF DIVING	REQUIRED QUALIFICATIONS (or equivalent)
Class A - limited General diving to 10m	SCUBA to 10m: - air only - no guiding - limited light-weight hand tools (for example, torch, dive slate, compact camera)	WRSTC/ISO Rescue (NZQA28395): + competency in free swimming neutral buoyancy + 12 dives in the last 12 months + occupational diving theory
Class B - minor General diving to 20m	SCUBA or Hookah to 20m: - air and nitrox to 20m - no guiding - sector specific hand-tools (for example, large format image capture, coring or small suction device, lighting, DPV)	All Class A requirements: + competencies in night diving and navigation + 21 dives with 12 dives in last 12 months + occupational diving theory
Class C - common General diving to 30m	SCUBA/CCR ¹ to 30m: - air and nitrox (<40%) to 30m - no guiding or instruction - sector specific hand-tools (for example, large format image capture, coring or small suction device, lighting, DPV)	All Class B requirements: + competencies in deep diving and search and recovery + 40 dives with 12 dives in last 12 months with 6 greater than 10m + occupational diving theory
Class D - advanced General diving to 40m	SCUBA/CCR ¹ to 40m: - no decompression - air and nitrox - instruction and guiding to 40m - sector specific hand-tools (for example, large format image capture, coring or small suction device, lighting, DPV)	All Class C requirements: + WRSTC Dive Master or <i>ISO 24802-3</i> (NZQA 28416) + 100 dives with 12 dives in last 12 months with 6 greater than 20m + occupational diving theory
Class E - technical General diving/technical 40m+	SCUBA/CCR ¹ 40m+: - decompression - mixed gas - sector specific hand-tools (for example, large format image capture, coring or small suction device, lighting, DPV)	All Class D requirements: + WRSTC/ISO Technical training over 40m depth (for example, TDI, PADI Tec, SSI XR, GUE etc) + 12 dives in last 12 months with 6 dives greater than 30m + Occupational diving theory

TABLE 3: Proposed general diving categories

3.4 Occupational diving theory

For the proposed General Diver categories, one of the required qualifications is 'occupational diving theory'. The intention of this requirement is for all general divers to show an understanding of:

- the legislation, guidelines, and CoC regime associated with occupational diving activities and working as an occupational diver
- the roles and responsibilities of persons regarding the health safety of self and others in the workplace.

These competencies are similar to the occupational health and Safety competencies listed in the AS 2815 series of standards which are referenced for the training of both the Commercial and Construction and Military and Government restricted diver categories. The intention would be to ensure that all occupational divers have the same base health and safety at work knowledge.

Various health and safety and regulatory awareness modules are already available for occupational divers, such as those through the Australian Diver Accreditation Scheme (ADAS), the Professional Association of Diving Instructors (PADI), industry bodies such as Science Diving New Zealand (SDNZ), and some Tertiary Training providers such as Toi Ohomai.

¹ CCR is used as the generic term for any suitable semi or fully closed rebreather.

Feedback received during the submission period will assist WorkSafe to identify other areas where similar learning material can be found. Our Diving Industry Advisory Group (DIAG) will also be asked to work with diving PCBUs to encourage including such training in their own workplace orientations or in-house training.

Why do general divers need these specific competencies?

The Health and Safety at Work Act 2015 outlines the duties of Workers and the various roles and responsibilities of persons regarding the health safety of self and others in the workplace. Understanding this legislation and the guidelines for occupational diving in New Zealand is an important part of knowing how to meet your obligations, and how to work as an effective member of a healthy and safe workforce. While Restricted Divers will undertake specific occupational diver training programs most General Divers are trained through the recreational diving industry and as such many lack awareness of these general workplace health and safety requirements.

3.5 Proposed transitional arrangements

WorkSafe is aiming to implement the changes to the CoC model by July 2023.

If you apply for a new CoC after this date, then your application will be assessed and your CoC issued in accordance with the new diving CoC model categories.

If you already have a CoC issued under the current diving CoC categories, then your CoC remains valid until its expiry, and you will be able to continue working in the category or categories listed on that CoC.

If you want to start working in a new sector or category (not provided for in your current CoC) before the CoC expiry date, then you will need to apply for a new CoC for that new category. Your application will be assessed in accordance with the new diving CoC model. Your current CoC will also remain valid with its existing categories and will continue until its expiry date.

If you apply to renew your current CoC, then your application will be assessed and your CoC issued in accordance with the new diving CoC model categories.

- If the renewal is in one or more of the Construction Diving Categories, then your application will be assessed and your CoC issued with the same categories (as the Construction Diving categories are not changing under the new model).
- If the renewal is going to include any of the new model categories (Military and Government or any of the General Diving categories), then your application will be assessed and your CoC issued with the equivalent new diving CoC model categories.
- If you wish to add a new category, then this will be considered a new application and will be assessed accordingly.

If you wish to see how your existing categories under the current diving CoC model map to the new diving CoC model categories, then please refer to the table in [Appendix C](#)

3.6 Working as a diver under the proposed new categories

Restricted diving

COMMERCIAL AND CONSTRUCTION

As a 'Commercial and Construction' diver there will be little change to your working as a diver. You will still be able to work in the Parts 1 (Scuba to 30m), 2 (SSBA to 30m), 3 (SSBA to 50m) or 4 (Closed Bell) shown on your CoC undertaking the work outlined in the sector definition in Appendix B. Should you wish however to undertake 'General Diving Work' then you will also need to hold a CoC at the General Diver risk level for the diving work being undertaken.²

Military and Government

Military and Government divers will be able to undertake any diving work specific to their service diving instructions or procedures as long as they meet the training and competency requirements outlined in such documents.

If a Military and Government diver wanted to work as a diver in any other category or sector, then they will need to hold the CoC for that category of diving work ('Commercial and Construction' and/or 'General').²

GENERAL DIVING

As previously mentioned in this paper, the General Diving category will include all occupational diving work not covered by the Restricted Diving categories. Divers operating as 'General Divers' will be limited to the diving activities and methods described in the various classes of General Diving CoC. Sometimes divers may need additional competencies or training outside those specified under the CoC categories. PCBUs should identify such requirements in their risk assessment process and ensure their divers are trained appropriately.

² See common questions below regarding why a separate General Diving category CoC is required.

4.0

Next steps and timing

IN THIS SECTION:

- 4.1 Consultation
- 4.2 Explanatory documentation
- 4.3 Common questions and answers

4.1 Consultation

The feedback we receive in this consultation will be used to inform the development of the risk-based categories and transitional arrangements for the proposed new occupational diving CoC model. We are working towards finalising the new model and introducing it by July 2023.

4.2 Explanatory Documentation

Once the final makeup has been decided, WorkSafe will work with industry and DIAG to produce explanatory documentation on 'How to apply for a CoC' and 'How to use the risk model' to determine the risk level of your diving work and any expected diving controls that may be needed. These will be made available prior to the introduction date above.

4.2 Common questions and answers

If the proposed changes are adopted will my current CoC expire immediately, and would I need to apply to renew it now?

No. Refer to the section on transitioning to the new model on page 12 of this document. Your current CoC will remain current until it's stated expiry date.

If I held a restricted category CoC, could I perform general diving work?

While most diver skills are transferable from restricted to general diving, there are specific requirements for the different General Diver categories of CoC that you would have to meet (please see the outline for General Diving Competencies in Table 3 and also [Appendix C](#)). The following explanation outlines this in more detail.

While many divers who held a restricted category of CoC would be competent to undertake some general diving work tasks (for example, inspecting a marine farm net or working in a film production tank) the biggest difference in the diving workplace would be specific free-swimming diver skills and the supervision and controls in use.

A diver holding a restricted diving category of CoC is trained to *AS 2815*, or an equivalent occupational diver standard, and this training is based around the competencies required to perform diving work under *AS/NZS 2299.1* or *DFI 32.1*. Much of this is tethered diving work with standby divers on the surface ready to assist if necessary and supervisors able to communicate directly with the diver in the water (either by tactile line or voice communications).

A diver holding a general diving category of CoC is trained under the Recreational Scuba Training Council (RSTC) standards by recreational diver training agencies (for example, PADI, SDI, SSI etc) and is trained in free-swimming buddy diver systems with different supervision and controls.

A restricted diver could perform dives in some general diving sectors (such as in Aquaculture or Film Production) but they would have to do so under their restricted diving systems of control (*2299.1* or *DFI 32.1*).

If however they wished to perform general diving work under general diving systems of control and as a general diver (for example, a science diving survey or HUET safety diver) then they would need to hold the appropriate general diving category CoC (for example, for SCUBA to 30m it would be Class C - Common).

In order to do this the diver would need to demonstrate that, in addition to holding a restricted diver CoC as a Part 1 (SCUBA to 30m) Diver, they have done free-swimming untethered diving that includes competency in buoyancy, buddy diver system rescues, and night diving over and above their restricted diving training.

Would I need a different general diver CoC for each qualification I get?

No, you only need to 'upgrade' your CoC if you are diving in a higher risk level or different category of diving. For example, a diver applies for a 'General Diver - Class B - Minor' CoC with the minimum competencies listed above. They then complete Nitrox training. They do not need to notify WorkSafe or apply for a new CoC as they are not moving between categories. However, a 'General Diver - Class A - Limited' would need to apply for a new CoC before using Nitrox as Class A - Limited only allows for Air as the breathing gas.

As a general diver, how would I move between CoC categories?

As a General Diver you would hold a category of CoC based upon your level of qualifications and experience. This would allow you to undertake any diving work within the conditions allowed in that category where you have suitable training or experience for the task at hand.

For example, as a 'General Diver Class B - Minor (General Diving to 20m)', you would be able to undertake open water night dives, with good visibility and direct ascent to the surface. You could be working for a science diving PCBU doing night surveys or collecting samples for an aquarium.

If you wanted to carry out other diving work, say in a TV show as a diving extra, then you could also perform that work as long as you have adequate knowledge and experience of similar work, or you have received adequate instruction or training to do the work safely, or you are adequately supervised by another person who has that knowledge and experience.

If, however, you wanted to undertake deeper or a higher risk diving task (such as working in a marine farm around nets collecting morts), you would need to hold a CoC as a 'General Diver Class C - Common' (General Diving to 30m).

To move from a General Diver Class B to Class C diver you would need to meet the competencies listed for the General Diver Class C, these being identified in the table above. These include holding additional competencies in Deep diving and Search and Recovery diving as well as having logged 40 dives in total, with 12 dives in last 12 months. To attain this CoC you would apply to WorkSafe for a new CoC as a 'General Diver - Class C - Common' and submit the applicable documentation.

The same system would apply to move to a Class D-Advanced or a Class E-Technical - you need to hold the competencies and experience at the level of CoC you wish to apply for.

As a business or PCBU, I want to employ a diver.

How do I know who is suitable?

As a business or PCBU you have responsibilities under regulation 9 of the Health and Safety at Work (General Risk and Workplace Management) Regulations 2016 to ensure that every worker has adequate knowledge and experience to undertake the work being asked of them.

To identify a suitable diver for a particular diving task firstly a risk assessment needs to be undertaken to identify the proposed diving activities and potential hazards. Once known, a competent person (for example, a diving supervisor) would then be able to correctly identify the diving competencies required to perform the task. This role could be taken by you as the PCBU or by a specialised Diving Business if you preferred.

As an example, a film production unit may want stunt and safety divers to work in a large pool set. A diving company is contracted to manage the diving activities and their risk assessment identifies divers need a high level of in water experience and skills dealing with overhead rigging and possible entanglements such that it is deemed to be Class C work. The PCBU diving company could not employ General Divers with 'Class A' or 'B' CoC but could employ ones with General Diver Class 'C', 'D' or 'E'. They must also ensure the divers had adequate knowledge and experience to undertake the work. This could be done by checking their resume, seeing if they are approved by a suitable professional body, have suitable formal training, or by conducting a practical skills assessment or in-house training for the work being done.

As a dive instructor which general diver CoC would I need?

Guiding or instructing automatically requires 'General Diver Class D - Advanced' as these activities are not permitted in the General Diver Class A, B or C categories. This would allow the instructor to teach students to a maximum depth of 40m using air or EAN. The 'General Diver Class D' has some restrictions (see above) so if the instructor wanted to work deeper than 40m, use mixed gas, or undertake decompression diving they would require the next category of CoC - 'General Diver Class E - Technical'. The instructor would also need to show evidence of suitable technical qualifications to qualify for this category.

I currently have a Scientific CoC with the competencies listed in AS/NZS 2815.6, which category of General Diver would I need?

This will depend on the diving activities you wish to perform. The AS/NZS 2815.6 competencies will be the equivalent to a 'General Diver Class C - Common', but if your intended diving activities exceed the restrictions of that category, you may require further training. Alternatively, your activities may fall within the Class A or B categories which you could undertake as a Class C diver - the higher levels include the categories before them.

I am working on a salmon farm that has a mix of general and restricted diving activities, which CoC would I need to have?

This will depend on the diving activities you wish to perform. Some diving tasks will be suitable for a general diver and some will require a restricted diver. You should consult with your PCBU prior to commencing any diving operations to ensure the activities are within the boundaries of the CoC holders performing the task.

Appendices

IN THIS SECTION:

Appendix A: Occupational diving risk levels

Appendix B: Occupational diving sector definitions

Appendix C: Occupational diving transitional mapping

Appendix A: Occupational diving risk levels

The Proposed Risk Model for Occupational Diving is based upon the understanding that as both the diving and the work being undertaken become more complex, so the risks and hazards increase. The higher the risk the greater the level of qualification, training, supervision, and support is required.

Here are some examples of increasing complexity and risk for diving activities. All these diving activities are fundamentally similar; they all have a diver breathing compressed gas underwater, but they have very different risk profiles. A diver wishing to perform these activities would require specific training in the roles and tasks involved.

- A diver retrieving golf balls in a freshwater lake in 5m depth with good visibility.
- A diver guiding a group of qualified divers around a sheltered marine sanctuary in 8m depth.
- A diver surveying and recording animals in a marine sanctuary at multiple depths with a large camera at 20m depth as part of a team of divers.
- A diver collecting mortalities in a salmon farm net in 28m of cold water.
- A diver teaching wreck penetration to a group of certified divers 40m depth with the potential to have limited visibility.

A simplified table view can be considered as a guide to the type of diving work undertaken and the risk level it fits into.

Risks and hazards of the diving work

Risk level

MORE

F

E

D

C

B

A

LESS

Complexity of work

Type of diving being undertaken

Saturation and/or closed bell diving using air and mixed gas with surface decompression operations

Diving using specialised tools, procedures and equipment requiring SSBA, SCUBA or CCR and decompression support systems

No decompression diving to 40m requiring specialised procedures and/or equipment using SCUBA, CCR or SSBA

No decompression SCUBA diving using air or nitrox to 30m requiring specialised procedures

General no decompression SCUBA or hookah diving in good conditions using air or nitrox to 20m

Limited air SCUBA diving in controlled and limited conditions to 10m

Level of qualification

RESTRICTED	Commercial and construction	Offshore bell diving	Underwater thermal cutting, heavy work with tools, lifting and assisted recovery, inspection and light hand duties	Levels A and B not applicable – all restricted diving is considered risk level C or above
	Military and Government		NZDF and other military force diver	
			Police national dive squad operations	
			Customs searches	
GENERAL DIVING	Film and media		Specialised underwater film set crew, safety and stunt diving	General video and photo work
	Science and archaeology		Invasive sampling and artefact recovery	Minimal sampling and surveys Visual surveys
	Recreational and tourism		Recreational and technical guiding and instruction	Recreational lookout and rescue Tourism support
	Aquaculture		Mort collection, farm maintenance	Shellfish farming and harvestings, farm inspection
	Aquariums and pools			Aquarium and pool repairs and fish collection Light pool or aquarium work
	Safety, HUET and rescue			HUET diving and rescue services Not applicable
	Other diving			Other general or limited diving work

Risk level	MORE F	E	D	C	B	A LESS
Potential risk of harm	SIGNIFICANT	MAJOR	ADVANCED	MODERATE	MINOR	LIMITED
Consequence of unmitigated hazards	Probable catastrophic injuries with multiple fatalities	Possible severe injuries to diver with serious life-threatening potential	Possible long-term harm to diver with life-threatening potential	Potential injuries and life-threatening harm to diver	Possible minor injuries with some harm to diver	Rare injuries with negligible threat of harm to diver
Required level on controls	Complex supervised controls needed to manage primary and backup life support and safety systems	Highly structured supervision needed to manage diving operations and safety systems	Structured supervision needed to manage various diving risks and associated controls	Supervised controls needed to manage specific diving risks and associated emergency systems	Standard controls and rescue systems	Standard controls needed to manage low risk operations

Level of supervision and controls

Risk level	MORE F	E	D	C	B	A LESS
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Appendix B: Occupational diving sector definitions

CURRENT DEFINITIONS (as per the 2004 Guidelines)		PROPOSED DEFINITIONS	
SECTOR	DEFINITION	SECTOR	DEFINITION
	Certificate of competence		Certificate of competence Restricted diving work <ul style="list-style-type: none"> - All diving using SSBA or Closed Bell systems - Includes any work in these sectors when diving on SCUBA, CABA and Rebreathers (CCR/CCBA)
Construction	<p>Construction diving includes any work taking place underwater in connection with the alteration, cleaning, construction, demolition, dismantling, erection, installation, maintenance, removal, renewal or repair of any building, edifice or structure or wall. Includes work in any canal, harbour works, drainage system, flood control, irrigation system, river control, culvert, dam, pipeline, reservoir and includes any work on a buoy, obstruction to navigation, raft, ship and wreck. Also includes any inspection or other work carried out for the purpose of ascertaining if construction diving work is to be carried out.</p> <p>Police, Military, Customs and specialised search and rescue diving groups are considered part of this category due to the highly hazardous nature of this underwater work and the frequent involvement in construction diving activities. (This group is expected to hold at least a Part 2 Restricted certificate.)</p>	Commercial and Construction <p>Any diving in connection with the alteration, cleaning, construction, demolition, dismantling, erection, installation, maintenance, removal, renewal or repair of any building, edifice or structure or wall. Includes such work in any canal, harbour works, drainage system, flood control, irrigation system, river control, culvert, dam, lake, pipeline, reservoir and includes any such work on a buoy, obstruction to navigation, raft, barge, commercial ship, wreck and offshore platform, and any diving work in association with the oil and gas production, extractives, and maritime transport industries.</p> <p>Also includes any diving done as part of inspection or other work carried out for the purpose of ascertaining if such diving work (described above) is to be carried out.</p>	
		Military and Government	<p>Any diving work undertaken by Military or Government Service personnel. It includes all NZ Defence Divers and others undertaking defence diving related activities in accordance with Defence Force Instructions, as well as any search, recovery, forensic or other response diving work taking place as a member of the NZ Police Dive Squad or other Government Services.</p>

CURRENT DEFINITIONS (as per the 2004 Guidelines)		PROPOSED DEFINITIONS	
SECTOR	DEFINITION	SECTOR	DEFINITION
	Limited certificate of competence		General diving work - Any diving work undertaken outside of the restricted areas of Commercial and Construction, Military and Government Services - Includes all General Diving Work undertaken on SCUBA, CABA, Rebreathers (CCR/CCBA) and limited Hookah Systems
Aquaculture	<p>Aquaculture diving is diving work carried out by those involved in fish, shellfish or aquatic plant farming. It may also include commercial harvesting.</p> <p>Aquaculture diving can involve minor routine maintenance, and renewal and repair work associated with marine farms. It does not include any construction diving activities.</p>		<p>General Diving will include all diving work in Film and Media, Science, Recreational and Tourism, Aquaculture, Aquariums & Pools, HUET, Safety and any other General Diving work.</p> <p>The different types of diving work in each of the different sectors will fall within the different Classes of General Diver: Class A - Limited; Class B - Minor; Class C - Common; Class D - Advanced; and Class E - Technical.</p>
Scientific	<p>Scientific diving is diving work carried out by scientists or other specialised persons that have completed specific scientific diver training to collect specimens or data for scientific use. It also includes the deployment, inspection, cleaning or retrieval of scientific instruments and equipment under the auspices of an educational, conservation or research institute. It does not include any construction diving activities.</p>		
Film and Pphotographic	<p>Film and photographic diving is diving work carried out by film, photographic and video production staff, including actors. It does not include any construction diving activities.</p>		
Instructor/tutor	<p>This is recreational diving instruction and supervision given by persons suitably qualified by a recognised recreational diver training agency and working in that capacity. The following agencies are recognised in New Zealand: CMAS, PADI, SSI, NAUI, IDEA, SDI and any other organisations that meets or exceeds the World Recreational Scuba Training Council training standards. This includes instructors, divemasters or dive controllers, or persons with an equivalent qualification. This category of diving includes the setting up of dive sites to enable recreational instruction to take place. It does not include any construction diving activities.</p>		
Tourism	<p>Tourism diving is dive work carried out by those involved with dive guiding and underwater tourist activities. This also includes those persons whose work is carried out in the confines of a pool or aquarium. It does not include any construction diving activities.</p>		

Appendix C: Occupational diving transitional mapping

Existing CoCs will transition across to the following equivalents.

Divers wishing to dive beyond their existing CoC Category would need to apply for New CoC under the new Risk Model.

EXISTING CoC CATEGORY	PROPOSED CoC CATEGORY
Construction – Part 1	Commercial and construction – Part 1 Scuba to 30m Possible equivalent if all general diver competencies met: - General diver Class C – common - General diving to 30m
Construction – Part 2 (R)	
Construction – Part 2	Commercial and construction – Part 2 SSBA to 30m
Construction – Part 3	Commercial and construction – Part 3 SSBA to 50m with chamber
Construction – Part 4	Commercial and construction – Part 4 Closed bell
	Military and Government
	General diver Class A – limited General diving to 10m
Tourism	General diver Class B – minor General diving to 20m
Aquaculture	General diver Class C – common General diving to 30m
Science	General diver Class C – common General diving to 30m
Film and photographic	General diver Class C – common General diving to 30m
Instructor/tutor	General diver Class D – advanced General diving to 40m
	General diver Class E – technical General diving/technical 40m+

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