

# IMCA Position Statement on Offshore and Inland/Inshore Commercial Diving Qualifications

## 1 Introduction

Offshore and inland/inshore diving projects are undertaken in many countries. Some countries have chosen not to have health and safety legislation relevant to such projects, but a number of countries in the world do have national regulations which apply to commercial diving projects. IMCA Members and other industry stakeholders must always comply with applicable national legislative requirements, including where the law specifies the need for persons to hold particular diver training certificates before they can be permitted to work as commercial divers on offshore or on inland/inshore diving projects.

IMCA has been informed that in some countries where legislative requirements for commercial diving qualifications are absent, Port Captains and Harbour Masters are insisting that all commercial diving activities within their areas of jurisdiction must be carried out by divers holding IMCA recognised offshore commercial diver training certificates and in full compliance with IMCA's offshore diving guidelines.

Similarly, in countries where legislative requirements for commercial diving qualifications are absent, some client companies who place contracts with diving contractors to deliver inland/inshore diving projects also insist that all such diving projects must be carried out by divers holding IMCA recognised offshore commercial diver training certificates and in full compliance with IMCA's offshore diving guidelines.

This information note has been produced to assist diving contractors, their clients, and others working in countries where there are no laws requiring commercial divers to hold specific commercial diving qualifications. The document clarifies IMCA's position on the qualifications that the Association considers suitable for the purpose of demonstrating the basic competence of those seeking employment as commercial divers within:

- ◆ the offshore commercial diving sector (the class of offshore diving), and
- ◆ the inland/inshore commercial diving sector (the class of inland/inshore diving).

Inland/inshore diving operations have a different risk profile from offshore energy related diving operations. The inland/inshore location:

- ◆ Often allows the site to call on local onshore emergency support providers and equipment which has otherwise to be provided onsite when offshore.
- ◆ Tends to have more shelter from the sea conditions compared to open water sites.
- ◆ Tends to have shallower worksites with less decompression management.

For offshore energy diving projects, whether they take place far offshore or very close to shore, the technical and operational hazards of working with heavy marine lifts, high pressures, hydrocarbons, and high power cables will always remain a constant challenge. These offshore energy industry

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hazards and their associated risks are likely to be significantly different to those arising from inland/inshore diving operations in support of civil engineering or marine-related projects.

IMCA's diving technical documentation is aimed only at the offshore energy diving sector. It is for other specialists to provide appropriate technical guidance on the safe and efficient conduct of inland/inshore commercial diving projects.

## 2 IMCA Commercial Diving Sector Definitions

### 2.1 The Class of Offshore Diving

IMCA defines offshore diving operations as underwater works that are carried out by divers in support of the construction and maintenance requirements of the offshore oil and gas and renewable/alternative energy industries at sea:

- ◆ outside the territorial waters of a country (normally 12 nautical miles or 22.2 kilometres from shore)
- ◆ inside territorial waters (within the 12 nautical mile limit)
- ◆ where closed bell or saturation diving techniques are used (both within and outside the 12 nautical mile limit), or
- ◆ where diving takes place from vessels maintaining station by the use of dynamic positioning.

This will include all diving operations undertaken in connection with:

- ◆ wells and pipeline works
- ◆ floating production systems
- ◆ loading buoys, and
- ◆ renewable energy structures – e.g. wind farms.

Note that diving operations carried out on SBM (single buoy mooring) installations and on oil and gas pipelines situated inside territorial waters are considered to fall under IMCA's definition of offshore diving.

Specifically excluded from IMCA's definition of offshore diving are diving operations being conducted in support of stacked drilling rigs, coastal refineries, vessel husbandry, civil, inland, inshore, salvage or harbour works or in any case where operations are not conducted from an offshore structure, vessel or floating structure normally associated with offshore oil and gas or renewable/alternative energy industry activities.

### 2.2 The Class of Inland/Inshore Diving

IMCA defines inland/inshore diving as diving operations carried out anywhere in the world being in support of civil engineering or marine-related projects:

- ◆ inshore within the territorial waters of a country (generally 12 nautical miles or 22.2 kilometres from shore)
- ◆ inland including in docks, harbours, rivers, culverts, canals, lakes, ponds, reservoirs and tanks other than 3) below

- ◆ inland in a tank or pool artificially constructed for the purpose of swimming, diving or use as an aquarium

for which a qualification for the class of offshore diving is required.

### 3 Suitable Diver Qualifications

#### 3.1 Suitable Diver Qualifications for the Offshore and Inland/Inshore Commercial Diving Sectors

See the flow-chart attached to this [document as Appendix 1](#).

The offshore commercial diver training certificates listed in the current version of IMCA information note [1394 Diver and Diving Supervisor Certification](#) are recognised by IMCA as suitable qualifications for those seeking employment as commercial divers in the offshore diving sector and for those seeking employment as commercial divers in the inland/inshore diving sector.

Inland/inshore commercial diver training certificates issued by the certifying authorities listed in the current version of IMCA information note [1609 – Verification of Diver Qualifications](#) as suitable qualifications for those seeking employment as commercial divers in the inland/inshore diving sector only. IMCA believes it is perfectly acceptable and appropriate for diving contractors to employ commercial divers holding such training certificates to work on inland/inshore diving projects.

**Note:** Inland/inshore commercial diving training certificates are not recognised by IMCA for offshore commercial diving activities.

#### 4 Other Diver Training Certificates

Aside from the diver training certificates referred to in section 3.1 above, there are no other diver training certificates recognised by IMCA as suitable for those seeking employment as commercial divers.

It is particularly emphasised that persons who only hold recreational diver training certificates issued by recreational agencies/organisations (e.g., PADI; NAUI; IANTD; and many others) are not trained commercial divers and must not be employed to undertake commercial diving tasks of any kind (either offshore or inland/inshore).

#### 5 Advice to Port Captains, Harbour Masters, Client Companies and Others

Persons whose acts or omissions may affect the safety of inland/inshore dive teams, even though they are not members of the team, are advised to take note of the following:

- 1) The IMCA Diving Division is focused on offshore oil and gas or renewable/alternative energy industry diving, i.e. diving within ‘the offshore energy diving sector’. Therefore, IMCA’s diving technical documentation is aimed only at the offshore energy diving sector. IMCA does not provide guidance on diving operations being conducted in support of stacked drilling rigs, coastal refineries, civil, inland, inshore, salvage or harbour works.

Although there is some significant overlap between the two classes of commercial diving, it is not appropriate for Port Captains, Harbour Masters, client companies and others to demand total compliance with IMCA offshore diving guidelines when inland/inshore diving contractors are planning, managing, and conducting inland/inshore diving projects.

IMCA is aware that a number of its members not only conduct diving work in the offshore energy diving sector, but also in other sectors of the diving industry. Diving activities that IMCA Members undertake in sectors other than the offshore energy diving sector fall outside of IMCA's remit and IMCA cannot comment or advise on the manner in which such activities are conducted.

Inland/inshore commercial diving activities should always be conducted in accordance with relevant national legislation and in compliance with the requirements of national regulatory authorities. Where regulatory authority requirements are absent or inadequate, and as a member of the International Diving Industry Forum (IDIF), IMCA looks to the Association of Diving Contractors International (ADCI) to provide suitable industry guidance for the safe conduct of inland/inshore commercial diving activities. That is the main business of the ADCI.

- 2) Port Captains, Harbour Masters, client companies and others should not insist that all diving must be carried out by divers holding IMCA recognised offshore commercial diver training certificates.

IMCA believes it is perfectly acceptable and appropriate for diving contractors to employ commercial divers only holding inland/inshore commercial diver training certificates issued by the certifying authorities listed in the current version of IMCA information note [1609 – Verification of Diver Qualifications](#) to work on inland/inshore diving projects. Indeed, such divers may have more knowledge and experience of inland/inshore diving activities than divers who normally work in the offshore energy diving sector.

- 3) Similarly, Port Captains, Harbour Masters, client companies and others should not insist that all inland/inshore diving projects must be supervised by IMCA certified diving supervisors.

IMCA believes it is perfectly acceptable and appropriate for diving contractors to employ demonstrably competent inland/inshore diving supervisors to work on inland/inshore diving projects who are not IMCA certified offshore diving supervisors. Indeed, such diving supervisors may have more knowledge and experience of inland/inshore diving activities than diving supervisors who normally work in the offshore energy diving sector.

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### Appendix 1 – Decision Tree for the Identification of Commercial Diver Qualifications Considered Suitable by IMCA for the Offshore and Inland / Inshore Diving Sectors

