

# **INTERIM CANADIAN FORCES RECREATION SCUBA CLUB POLICY**

## **PURPOSE**

1. This policy prescribes the regulating guidelines for the operations of Canadian Forces (CF) recreational SCUBA club programs and activities.

## **GENERAL**

2. Recreational self-contained underwater breathing apparatus (SCUBA) diving activities may be included as a recreation program under the conditions prescribed in this policy.

3. The risks inherent in SCUBA diving and the degree of knowledge, competence and physical fitness required demand that activities be adequately controlled.

## **SECTION 1 – RECREATIONAL SCUBA**

### **DEFINITION**

4. For the purpose of this policy, recreational SCUBA diving shall mean that:

- a. dives shall be restricted to the maximum depth as outlined by an individual's certifying agency, or shallower, and appropriate to the level of training and experience of the divers involved;
- b. dives shall be planned and conducted as no-decompression dives; and
- c. the use of enriched air is authorized under the conditions described at paras 25 and 26 below.

5. Technical SCUBA diving is not an authorized activity for CF recreation SCUBA diving clubs. Technical diving is defined as the utilization of procedures or techniques beyond recreational diving limits.

### **CF RECOGNIZED SCUBA CERTIFICATION AGENCIES**

6. ACUC, NAUI and PADI are the major SCUBA Certification Agencies recognized by the CF. Divers associated with certification agencies who are members of the Recreational SCUBA Training Council of Canada are also recognized by the CF for the purpose of membership and instruction in CF Recreation SCUBA clubs. CF Recreation SCUBA Clubs outside Canada may recognize certification agencies that are members of the World Recreational SCUBA Training Council.

### **PARTICIPATION**

7. To participate in CF recreation SCUBA club activities each new club member shall:

- a. provide a valid certification from a CF recognized SCUBA certification agency as defined in para 6;
  - b. complete a medical history form obtained from a CF recognized certifying agency or the Recreational SCUBA Training Council of Canada (medical to be carried out if contraindications are indicated);
  - c. provide a logbook to show proof of experience. At the discretion of the Chief Instructor, new members may be required to attend a refresher course before they are allowed to participate in CF recreation SCUBA club dives; and
  - d. CF personnel holding a military sub-specialty diving qualification are considered qualified sports divers by ACUC. To qualify for certification, the above personnel shall follow the ACUC crossover training procedures for military divers.
8. Members renewing their CF recreation SCUBA club membership shall have their medical history form updated annually indicating any changes occurring in the past year. It is the responsibility of the club member to immediately inform the CF recreation SCUBA club executive of any medical condition that is a contraindication to diving.

## **TRAINING**

9. Training for CF recreation SCUBA clubs shall be conducted only by instructors currently accredited by a Certification Agency recognized by the CF. All CF recreation SCUBA club instructors shall conduct training in accordance with the standards prescribed by their agency only. Copies of instructor certifications shall be held on file with the Recreation Council and CF recreation SCUBA Club.
10. To participate in CF recreation SCUBA club sponsored courses, each new student shall:
- a. meet all prerequisites in accordance with the certifying agency's standards; and
  - b. provide a medical certification in accordance with the certifying agency and appropriate for the course to be taken.

## **SECTION 2 – CF RECREATION SCUBA CLUBS**

### **RECREATION SCUBA CLUBS**

11. CF recreation SCUBA clubs shall be organized as part of the Base Recreation Program under the direction of the Recreation Council and operated as follows:
- a. The CF recreation SCUBA club organization and operation must meet the requirements of recreation clubs in accordance with CFAO 50-20;
  - b. The CF recreation SCUBA club executive shall appoint a technical committee, chaired by a chief instructor and composed of currently accredited and CF recognized: instructors; assistant instructors; divemasters; and a club equipment manager;
  - c. appointment of a chief instructor must be recommended by the club technical committee. The CF recreation SCUBA club executive will endorse the appointment and forward the nomination for approval by the Commanding Officer via club meeting minutes. (The chief

instructor should be the most experienced and currently active instructor who is a club member);

- d. CF recreation SCUBA club by-laws must include specific operating procedures for the safety regulations prescribed at Annex A ; and
- e. where possible, each CF recreation SCUBA club in Canada should affiliate with its respective provincial underwater council.

12. Prior to participation in CF recreation SCUBA club activities members must meet the prerequisites prescribed at paras 7 and 8 or attend a course and qualify to the minimum standard established by a CF approved certifying agency. The course instructor must be a currently accredited instructor of an organization recognized by the CF.

13. Where special local or operational conditions preclude a CF recreation SCUBA club from operating in accordance with this policy, the club shall submit in writing, through the commanding officer and parent command headquarters to Canadian Forces Personnel Support Agency, Executive Vice President – Personnel Support Programs, the nature of the problem, the proposed solution and a request to be exempt from certain regulations contained in this policy.

#### **CF RECREATION SCUBA CLUB ACTIVITIES**

14. CF recreation SCUBA club divers who have qualified in accordance with paras 7 and 8 may participate in sanctioned CF recreation SCUBA club activities under the following conditions:

- a. Sanctioned CF recreation SCUBA club dives are defined as dives organized by the executive committee and supervised by a club member or charter operator certified as a Divemaster or above by a CF recognized certification agency;
- b. The dive supervisor shall hold a current Oxygen Provider Certification when an O<sub>2</sub> unit is available on site;
- c. When a CF recreation SCUBA club activity involves more than three buddy teams diving at the same time, one buddy team should remain on the surface to be available for an emergency or as a minimum, a safety diver must be on stand-by and suited up while members are in the water;
- d. All CF recreation SCUBA club equipment used in sanctioned club dives must be certified as serviceable;
- e. All sanctioned CF recreation SCUBA club dives must be recorded in an appropriate club dive log;
- f. Sanctioned CF recreation SCUBA club dives must take place in areas recognized by the club as being safe and shall be classified by a member of the technical committee as appropriate to the skill level of the participating divers; and
- g. Sanctioned CF recreation SCUBA club dives must be planned so that a minimum of two divers are under the water at any one time within direct proximity to each other (the “buddy” system);

**NOTE** – Only in the case of emergency, where loss of life might otherwise occur, may a lone descent be undertaken.

## **CF POOL SUPERVISION**

15. In accordance with the Interim CF Aquatics and Water Safety Policy, the following aquatic supervision guidelines must be adhered to for club activities:
- a. when a CF pool is in use for a CF recreation SCUBA club non-instructional activity and general non-club aquatic activities, a qualified lifeguard is required on deck and a Designated Operator (DO) is required within call as per the CF Aquatics and Water Safety Policy;
  - b. When a CF pool is in use for a non-instructional CF recreation SCUBA club activity, with all participants using SCUBA equipment, a qualified lifeguard, a qualified SCUBA instructor or a certified Rescue Diver is required on deck and a second within call as the DO. A minimum of two divers must be under the water at any one time, and all divers must utilize the “buddy” system;
  - c. lifeguards are not required for CF recreation SCUBA club instructional sessions provided a certified SCUBA instructor provides direct on-deck/in water supervision. Instructors are to supervise students in strict accordance with their respective association supervision ratios and standards; and
  - d. during instructional sessions, a DO must be within call. The DO may be NLS certified, as per the CF Aquatics and Water Safety Policy, a certified SCUBA instructor or a certified Rescue Diver.

## **EQUIPMENT**

16. Each CF recreation SCUBA club is responsible for providing its own equipment. CF recreation SCUBA clubs approved in accordance with this policy are not entitled to the diving equipment provided in CF scales of issue for military diving operations. Military diving equipment on permanent issue may only be used for CF recreation SCUBA club diving by members of the Regular Forces who are qualified as military divers, with the specific approval of their commanding officer and subject to such policies, procedures and limitations as may be promulgated to govern its use. Closed or semi-closed circuit re-breathing apparatus shall not be used for CF recreation SCUBA club diving. The selection and purchase of club equipment must be approved by the Technical Committee or Chief Instructor to ensure that safety standards are met.

17. It is highly recommended that CF recreation SCUBA clubs purchase and maintain an emergency oxygen unit. The unit should be designated, in club by-laws, as mandatory equipment for sanctioned CF recreation SCUBA club dives and open water dives for instructional courses. Club members authorized to use the oxygen unit must hold an Oxygen First Aid certification from a certification agency recognized by a CF recognized SCUBA agency.

18. Certified divers who are members of a club may utilize club equipment for personal dives.

## **INSURANCE**

19. CF recreation SCUBA clubs established and operating in accordance with this policy are Base/Wing/Unit Fund sponsored activities and therefore are included for coverage under the NPF Consolidated Insurance policy as described in A-FN-105-001/AG-001 (CFP 105), Policy and Procedures for Non-Public Fund Accounting, Chapter 11. This insurance policy provides for protection against loss and damage of non-public fund property and for public liability of the commanding officer as the person responsible for the operation of Base/Wing/Unit Fund sponsored activities. There is no coverage provided

for participants against dangers inherent in the activity. To ensure participants are aware of, and accept responsibility for, the inherent dangers of the activity, all participants and/or club members must sign a release of liability/waiver prior to participation.

20. Participants in CF recreation SCUBA club activities should be made aware of the limitations of the NPF Consolidated Insurance policy and of the need to review personal accident and life insurance coverage to ensure that there is no exclusion for SCUBA activities and that benefits are realistic. The responsibility for arranging and paying for such coverage rests with the individual.

21. CF recreation SCUBA club members or contractors who assist, instruct or certify students for the club must hold a current certification with a CF recognized SCUBA agency, as well as, professional liability insurance. The NPF Consolidated Insurance policy does not cover claims for instructor negligence.

22. CF recreation SCUBA clubs are considered the sponsor of all CF recreation SCUBA activities and courses. When club equipment or DND facilities (reserved by the CF Recreation SCUBA club) are used for CF recreation SCUBA club activities or courses, the Club is liable, and as such, must operate in accordance with the directives of para 19. Non-CF recreation SCUBA activities, are not to be affiliated with CF recreation SCUBA clubs, and accordingly, must follow the procedures for Non-Military Use of Property – Contracts through the appropriate Base/Wing/Unit authority.

### **SEARCH AND RESCUE**

23. CF recreation SCUBA diving clubs shall not volunteer to be part of an organized Search and Rescue Operation.

## **SECTION 3 – RECREATION SCUBA CLUB RESTRICTIONS**

### **DEPTH RESTRICTIONS**

24. Under normal circumstances, CF recreation SCUBA club divers shall plan their dives within no decompression limits and to the maximum depths authorized by their certifying agency (a CF recognized SCUBA agency) and qualification level. Decompression dives shall only be undertaken in emergency situations. It is recommended that novice divers (newly certified divers with less than 15 logged dives) limit their depth to 20 meters.

### **NITROX DIVING**

25. Recreational NITROX diving is authorized for CF recreation SCUBA Club diving members under the following conditions:

- a. divers must hold a recreational NITROX certification (level 1) from a recognized CF Certification Agency;
- b. divers shall conduct their NITROX dives in accordance with the parameters of their certification. They shall be solely responsible for planning and conducting their NITROX dives and accept full responsibility for the added risk that NITROX diving entails; and
- c. NITROX dives conducted beyond the scope of the introductory level are classified as technical dives and are not considered a recreational activity.

26. CF recreation SCUBA diving club equipment shall not be modified or used for NITROX diving. CF recreation SCUBA diving clubs are not authorized to operate NITROX air fill stations.

#### **AIR QUALITY ASSURANCE PROGRAM**

27. CF recreation SCUBA clubs shall forward a representative sample of the compressed air used by the club bi-annually to Defence Research and Development Canada's, designated contractor for analysis. Procedures and covering information shall be in accordance with Annex B.

28. When CF recreation SCUBA clubs rent tanks, a statement of understanding should be completed at least once by each renter to confirm that air fills will be obtained at tested sources. The completed statements should be retained until each tank has passed its next visual test. It is the responsibility of the CF recreation SCUBA club members to confirm a commercial air source has a current air quality certification before filling club tanks.

#### **FINANCIAL LIABILITY**

29. All costs incurred for CF recreation SCUBA club training or operations are the responsibility of the individual member or the club. This does not preclude requests for out-service instructor training for military personnel or requests to Base/Wing/Unit Fund for capital asset grants.

### **SECTION 4 – CF SCUBA CLUB ACCIDENT MANAGEMENT**

#### **ACCIDENTS AND UNUSUAL INCIDENTS**

30. Considerable importance is attached to the study of accidents and unusual incidents experienced by SCUBA divers in all types of SCUBA accidents. The analysis of accurate data recorded shortly after an actual or simulated dive in which injury has occurred, or could have occurred owing to failure of equipment or procedure, is an important factor in the future safety of divers.

31. In the event of a SCUBA accident or an unusual incident, the diving supervisor (the chief instructor, or most experienced club member, on site) shall immediately take charge of the situation and direct those available in rescue, recovery, first aid and notification of the appropriate local authorities. The dive supervisor shall record pertinent information, including the names and addresses of witnesses, for future reference. The affected diver's equipment shall be quarantined for possible investigation by local authorities or Defence Research and Development Canada, Toronto (DRDC (T)), if requested. On scene control may be relinquished to local authorities upon their arrival. The captain of a vessel involved in a diving incident will be in charge of emergency operations.

32. In the case of a serious accident occurring in Canada, the services of DRDC (T) are available to advise on decompression treatment or to correlate previous dive history with respect to decompression treatment. Request for the above services should be made by telephone or message as follows:

- a. by telephone to (416) 635-2000; or
- b. by priority message to DRDC Toronto, Diving Division.

33. Divers Alert Network (DAN) is a not-for-profit organization that maintains a worldwide list of recompression chambers and a 24-hour emergency phone service (1-800-446-2671). The 24-Hour Diving Emergency Hotline as well as the Dive Safety and Medical Information Line can provide valuable information in the case of an emergency or questions regarding diving contraindications. CF recreation SCUBA clubs are encouraged to utilize this resource in addition to DRDC (T).

## **REPORTING OF DECOMPRESSION SICKNESS AND ALL SCUBA DIVING ACCIDENTS AND INCIDENTS**

34. All CF recreation SCUBA club accidents and incidents must be reported. These reports provide data for analyzing the safety of decompression tables and the effectiveness of treatment procedures. They also provide valuable information on a variety of other diving hazards. Analysis of the reports is important in the continuous effort to improve diving practices and to increase diving safety in general.

35. An accident/incident report shall be initiated by the diving supervisor for all cases of SCUBA diving accidents involving a CF recreation SCUBA club activity. Reporting of the following types of accidents or incidents is mandatory:

- a. any death or life threatening diving related injury;
- b. convulsions or serious impairment of consciousness during or after a dive;
- c. decompression sickness (bends);
- d. air embolism; or
- e. any significant mishap, even though the diver escapes actual injury, or a series of incidents that render suspect any equipment or procedure.

36. To be of value, the facts must be established with care and recorded immediately after the accident or incident. The report should include all details, however remote, that might have a bearing on the case.

37. The CF recreation SCUBA Club Accident/Incident Report at Annex C must be completed and forwarded to the following personnel:

- a. CFPSA – National Recreation and Youth Services Manager (thru the Rec Director/Coord);
- b. Dive supervisor's Certification Agency;
- c. Accident victim's Certification Agency; and
- d. DAN.

38. The National Recreation and Youth Services Manager will be responsible to disseminate critical findings or information to CF recreation SCUBA clubs as soon as possible following an incident.

## **INVESTIGATION OF EQUIPMENT AFTER A DIVING ACCIDENT OR INCIDENT**

39. Non-Fatal Accidents or Incidents. Upon recovery of the diver, the dive supervisor shall close the cylinder valve and record the number of turns required to complete this closure. The position of the emergency reserve valve (J value), if present, shall also be noted and recorded. Both the regulator and the cylinders shall be inspected by the most experienced diver available. An air sample of any air remaining in the cylinder must be sent for analysis if the incident so dictates. The supervisor should also note the securing arrangements and condition of the SCUBA system before they are removed from the diver. He/she should also secure the victim's dive computer, if used, for possible extraction of dive profile information.

40. Fatal Accidents. Upon recovery of the diver, the dive supervisor shall close the valve and record the number of turns required to complete this closure. The position of the emergency reserve valve (J valve), if present, shall also be noted and recorded. Special care shall be taken to secure the victim's dive computer, if used, for possible extraction of dive profile information. All equipment shall then be quarantined and forwarded to the proper authorities for analysis.

41. In both cases referred to in paras 39 and 40, local authorities will have jurisdiction, unless the accident occurs on DND property.



## **Annex A – SAFETY REGULATIONS**

1. CF recreation SCUBA clubs shall ensure that safety regulations are enforced at all times and shall issue safety orders containing specific detail concerning:
  - a. locally recognized diving areas and their restrictions;
  - b. diving prerequisites, e.g., boat or floatation devices, flags to be issued;
  - c. the criteria by which the club chooses suitable charter vessels for club activities including safety equipment, emergency access plans, communications, operator qualifications and services to be provided;
  - c. all aspects of air supply, including approved sources of air, and care and maintenance of the club's air compressor (if applicable) to ensure the highest standards of purity of air;
  - d. the Equipment Manager's duties for the care and maintenance of SCUBA equipment including the following safety measures:
    - (1) annual visual inspection (by a certified inspector) of air cylinders for deterioration, corrosion, contamination or damage;
    - (2) hydrostatic testing of air cylinders every five years by a certified inspector, or more frequently if considered necessary as a result of the annual visual inspections;
    - (3) frequent visual external inspections of regulators and air reserve valves for deterioration, corrosion, contamination or damage;
    - (4) normal post-dive maintenance routines;
    - (5) annual, or more frequent, overhaul of regulators and air reserve valves by a certified technician; and
    - (6) use of a log book to record the servicing and maintenance of club equipment;
  - e. "supervisor" and "safety" diver duties and responsibilities;
  - f. minimum equipment requirements; and
  - g. any safety regulations over and above those required by the authorized CF Certifying Agencies.
2. Club members must read and sign the safety orders before they are eligible to participate in the CF recreation SCUBA club activities.

## **ANNEX B – CANADIAN FORCES RECREATION SCUBA CLUBS AIR QUALITY ASSURANCE PROGRAM**

### **General**

1. Every six months, or prior to putting a compressor back in service after extended storage or maintenance, each CF recreation SCUBA club shall forward a representative sample of the compressed air used for diving purposes to the contractor hired by Defence Research Development Canada (Toronto) (DRDC (T)) for analysis. In special circumstances, the time period for testing may be extended to eight months (see para 16 in CFTO D87-0003-000/SG-001). However, CF recreation SCUBA clubs using air supplied by an authorized CF source, such as a Fleet Diving Unit, from which samples are regularly sent to DRDC (T), are exempt from submitting samples; they are required only to indicate their source of air. DRDC (T) is authorized to liaise directly with each CF recreation SCUBA club.
2. The samples will be analysed for trace contamination, oxygen, water vapour and oil content to determine conformity with the standards required by the most recent versions of CFTO D87-003-000/SG-001 - Purity of Compressed Breathing Air and Gases for Divers and Canadian Standards Association Standard SCA Z180-1. When analysis indicates that the sample failed to meet these standards, or when a CF recreation SCUBA club fails to submit samples for analysis, the compressor shall be quarantined until corrective action has been taken and conforming test results are received from DRDC (T).
3. DRDC (T) shall forward copies of all analytical results, toxicological implications and recommendations to:
  - a. CFPSA/National Recreation and Youth Services Manager;
  - b. the applicable Base/Wing/Unit Surgeon;
  - c. the applicable Base/Wing/ Unit Repair & Maintenance shop; and
  - d. the applicable Recreation Director/Coordinator to which the CF recreation SCUBA club is affiliated, who shall be the authority to suspend club operations if the air sample does not meet the CF Standard.

### **Shipping**

4. User units shall request shipment of a high-pressure sampling assembly from the DRDC (T) contractor, Maxxam Analytics Inc. (Air Quality), at (905) 890-2555, ext 272 or fax (905) 890-2456. Substitute cylinders shall not be used.
5. User units shall return sampling assembly to the above contractor.
6. Air samples shall be transported at public expense. The sample assembly shall be transported to and from the contractor in para 4 by immediate operating requirement (IOR) through the Base Central Material and Traffic Terminal section, prepaid by the sending unit.
7. The unit requesting sampling shall include the Military Compressor Data Sheet with the sample bottle. Information shall include the compressor identification number assigned by DRDC (T) and the sample cylinder number for tracking purposes.

**ANNEX C – CANADIAN FORCES RECREATION SCUBA CLUB ACCIDENT / INCIDENT REPORT**

Name \_\_\_\_\_ Dive Club \_\_\_\_\_

Membership Status: Regular \_\_\_\_\_ Ordinary \_\_\_\_\_ Associate \_\_\_\_\_

**DIVE CLASSIFICATION**

Sanctioned Club Dive \_\_\_\_\_ Individual Dive \_\_\_\_\_ Club equipment used: Yes \_\_\_\_\_ No \_\_\_\_\_

Course (type) \_\_\_\_\_ Certifying Agency: \_\_\_\_\_

Instructor's name \_\_\_\_\_

**PERSONAL INFORMATION**

1. Number of divers involved \_\_\_\_\_ Diver's Age \_\_\_\_\_
2. Diver certification level: \_\_\_\_\_ In training \_\_\_\_\_ Basic Open Water  
\_\_\_\_\_ Advanced \_\_\_\_\_ Divemaster  
\_\_\_\_\_ Instructor \_\_\_\_\_ Other

Number of years diving \_\_\_\_\_ Number of dives made this year \_\_\_\_\_

3. Certifying Agency: ACUC \_\_\_\_\_ NAUI \_\_\_\_\_ PADI \_\_\_\_\_ Other \_\_\_\_\_

**ACCIDENT/INCIDENT CLASSIFICATION**

1. Type of dive: Skin \_\_\_\_\_ SCUBA \_\_\_\_\_ Pool \_\_\_\_\_ Frequency: Single \_\_\_\_\_ Repetitive \_\_\_\_\_
2. Was the accident/incident fatal \_\_\_\_\_ or non fatal \_\_\_\_\_
3. Did any physical injury result? Yes \_\_\_\_\_ No \_\_\_\_\_ If so, describe \_\_\_\_\_  
\_\_\_\_\_

4. Location of accident/incident: \_\_\_\_\_ Province \_\_\_\_\_

Date \_\_\_\_\_ Depth \_\_\_\_\_ Time \_\_\_\_\_ Lighting \_\_\_\_\_

Shore Dive \_\_\_\_\_ Boat Dive \_\_\_\_\_

5. Conditions and Circumstances

Water: fresh \_\_\_\_\_ salt \_\_\_\_\_ temperature \_\_\_\_\_ visibility \_\_\_\_\_  
Atmosphere: temperature \_\_\_\_\_ visibility \_\_\_\_\_ sea state \_\_\_\_\_

6. Dive involved: \_\_\_\_\_ Recreation \_\_\_\_\_ Wreck \_\_\_\_\_ Cave \_\_\_\_\_  
\_\_\_\_\_ Night \_\_\_\_\_ Photography \_\_\_\_\_ Ice \_\_\_\_\_  
\_\_\_\_\_ Drift \_\_\_\_\_ Nitrox \_\_\_\_\_  
\_\_\_\_\_ Under Instruction \_\_\_\_\_ Providing Instruction \_\_\_\_\_

**THE ACCIDENT/INCIDENT**

1. When was the accident/incident detected?  Preparation  Entry  
 Descent  During dive  Ascent  Exit  
 Following exit

How long into the dive did the problem occur: \_\_\_\_\_ (minutes).

2. Following factors that may have contributed to the accident/incident (check all that apply):  
 Anxiety about the dive  Lack of buddy check  Not familiar with dive site conditions  
 Haste  Error in judgement  Failure to understand equipment  
 Poor communication  Poor physical fitness  
 Failure to understand dive instructions/tables  
 No pre-dive safety check  Weather conditions  Poor maintenance of equipment  
 Inattentive during dive  Poor dive planning  Sea sickness/illness  
 Inadequate supervision  No medical clearance  Insufficient training/experience

3. Equipment used on dive (check all that apply):  
 Depth gauge  Timing device/watch  Buoyancy compensator  
 Computer  Pressure gauge  Dry suit  
 BC inflator hose  Dive knife  Weight belt  
 Secondary air source  Mask  Fins  
 Snorkel

Weight on weight belt: \_\_\_\_\_ lbs.

4. Equipment Malfunction:  Regulator  BC  Weight belt  
 Dry suit  Computer  Inflator hose  
 Tank  Pressure gauge  Depth gauge

5. Buoyancy Problem:  No  Overweighted  Underweighted  
 Air used frequently to maintain buoyancy

6. Air Consumption:  No problem  Ran low  Out of air  
 Buddy breathing  Octopus used  Contaminated air

**RECOVERY/FIRST AID**

Artificial respiration  CPR  O2 administered

Describe the emergency treatment given.

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Detailed description of the accident/incident. Relate only the information that is factual.

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