

**From CEO John Clegg**

I would like to bring to your attention the growing role of contractors in the management of health and safety on offshore facilities. In many cases, organisations which consider themselves principally to be contractors are, in fact, registered operators of facilities. Under our occupational health and safety laws, operators of facilities bear a major responsibility for the day-to-day management of safety.

NOPSA recognises the growing use of contractor services in the offshore industry and wishes to ensure that contractor organisations are fully aware of their responsibilities under the law. The duties of contractors as employers of workers in the offshore industry are spelled out in schedule 3 of the *Offshore Petroleum Act 2006* and its associated regulations.

When our inspectors go offshore they are looking to see that contractors are complying with their responsibilities under the law as well as examining the compliance of those operators that the contractors may be working under.

For operators using contractors, it is important to ensure that you have effective contractor selection and contractor management processes in place and that you are using them. This will help you meet your duty to implement and maintain safe systems of work.

## Industry matters

**Incidents highlight need for robust management of projects**

Production losses and increased risk to people on board from a number of hydrocarbon release incidents during the start-up and early phase of operations of a new facility have prompted a safety [alert](#)<sup>1</sup> now available on NOPSA's website.

The alert highlights the need for a robust project management system. Some of the failures that occurred due to the inadequate project management system included leakage from a pilot valve for a pressure safety valve. Importantly there were no traceable records for repairs conducted during the project.

The most significant failure resulted in a release of hydrocarbons from the high pressure flare header which was caused by a failure of the fuel gas piping connected to the flare header.

The safety alert summarises the key lessons to be learnt from this situation. They include that the project specifications must be established in sufficient detail and approved at the start of the project.

### **Sessions on new safety case guidance notes**

NOPSA will hold its first information sessions in Perth on 3 October, followed by a session in Melbourne, to introduce a suite of safety case guidance notes. The information sessions will explain the development process, the structure of the guidance notes, progress to date, opportunities to comment and, in some cases, to participate in the development of selected topics. These sessions will be an introduction to the process - many of the guidance notes are still in development. The sessions are aimed at operators, safety case custodians and developers, risk engineers and members of the workforce and its representatives. To express your interest in attending these workshops please contact [info@nopsa.gov.au](mailto:info@nopsa.gov.au) using the subject heading *Guidance Notes Sessions*.

### **NOPSA takes enforcement action on crane safety**

NOPSA recently responded to a complaint from the workforce on a pipelay barge regarding safety issues with cranes. Two NOPSA inspectors visited the facility to interview the workforce and conduct an investigation. The complaint was resolved and a prohibition notice and two improvement notices were issued.

### **Timing of safety case decisions**

Where NOPSA requires a validation to be done, the corresponding safety case decision cannot be made until an acceptable written validation is delivered to NOPSA. Some safety case decisions have had to wait for the validation to be completed and for the results to be provided to NOPSA.

NOPSA is as keen as industry to see that decisions are made in a timely way. NOPSA encourages operators and validators to take into account the potential impact of the submission of the validation on the timing of the safety case decision. [Policy](#)<sup>2</sup> and guidance on this matter is available on NOPSA's website.

### **Operator registration**

Operator registration is a crucial decision. Legislation requires NOPSA to decide on the acceptance of operator nomination based on whether the party nominated will have day-to-day management and control of the facility. Once accepted, it is the operator that bears the primary duties of care for health and safety at the facility. NOPSA has developed guidance regarding operator nomination and registration which can be found on [its website](#)<sup>3</sup>. NOPSA has also recently revised the operator [nomination forms](#)<sup>4</sup> to reflect the adoption of the *Offshore Petroleum Act 2006*. There is also an updated guidance note on [operator registration criteria](#)<sup>5</sup>. NOPSA reminds potential operators to

ensure that they use the current version of the forms and that their documentation is completed in full.

### **Safety events successful**

NOPSA congratulates the organisers responsible for the recent HSR Safety Forum and the APPEA 2008 Safety Conference held at the Burswood Convention Centre for promoting offshore health and safety through a series of relevant and topical presentations. It is pleasing to see the quality of these events improving and attendance increasing.

### **Accommodation Guidelines Working Group**

NOPSA has organised a Working Group composed of workforce representatives, industry representatives, and NOPSA to develop guidelines for the provision of accommodation on offshore facilities. The group has had its first meeting and intends to meet quarterly for about eighteen months. The intent is to produce a set of voluntary guidelines to encourage operators to continuously improve accommodation offshore.

## **Learn by example**

Here we provide examples of good and bad practice seen in the offshore industry during recent NOPSA inspections.

### **GOOD PRACTICE**



*An acoustic enclosure fitted to a cementing system contributes to effective noise management.*



*A dedicated self contained breathing apparatus refilling reduces the likelihood of contamination*

**BAD PRACTICE**

Acetylene bottles secured with rope – this is a dangerous way to store containers of flammable pressurised gases.



This workshop milling machine does not have guarding to protect its users from injury.

**Information leaflets underway**

A series of easy-to-read leaflets explaining key concepts in the offshore health and safety regulatory regime and NOPSA's role is being produced. The first two titles *Improvement & Prohibition Notices* and *What is a Safety Case?* are now available. Hard copies can be ordered from [info@nopsa.gov.au](mailto:info@nopsa.gov.au) with subject line "Leaflets". Other titles available soon include *Understanding Duty of Care*, *Issue of Provisional Improvement Notices by Health and Safety Representatives*, *Reporting Accidents and Dangerous Occurrences*, *Understanding the Role of Health and Safety Representatives*, *Understanding NOPSA and how it operates*.

**Stakeholder relations****Presentations tackle current safety issues**

A detailed overview of OHS legislation, the role of NOPSA and where the HSR fits into the safety picture on facilities was delivered by the General Manager (Regulatory) of NOPSA, at the recent annual HSR Forum at Burswood. Some of the issues raised included that HSRs need a good understanding of hazards and their controls, and management of change. The [full presentation](#)<sup>6</sup> is available for download on the NOPSA website.

A presentation delivered by the NOPSA CEO to the APPEA 2008 National Safety Conference held at Burswood highlighted latest findings from the safety authority on its national programmes on facility integrity and lifting operations and emphasised the need for sustained effort by operators in these

areas. The presentation ended with a quote from the CEO of the US Chemical Safety Board: “All industrial managers need to treat safety and major accident prevention with the same degree of seriousness and rigor that is brought to financial transactions.” The [full presentation](#)<sup>7</sup> is available for download on the NOPSA website.

## Website

### Quarterly safety performance data

Quarterly [performance data](#)<sup>8</sup> compiled by NOPSA on gas releases, major and significant incidents and Lost Time Injuries and Total Recordable cases is available on the NOPSA website.<sup>9</sup>

### New safety alert

A new [safety alert](#)<sup>10</sup> with lessons learned from a series of incidents involving a new facility is now available on the website.

## Regulatory activities

### As at 27<sup>th</sup> August 2008

*Disclaimer: Activity and incident quantities identified here may vary as further information becomes available. Statistics are prepared just prior to the last Friday of the month*

### Safety Case Assessment

<b>August 2008 Assessment Type</b>	<b>Submitted</b>	<b>Accepted / Completed</b>	<b>Rejected</b>	<b>Exemption</b>	<b>Being Assessed</b>
Safety Case NEW	3				8
Safety Case REVISED	6	10			18
Safety Case OTHER	1			1	
Pipeline SMP NEW	1				1
Pipeline SMP REVISED					
Proposed PMP	3				3
Diving SMS					1
Diving Project Plan					
Scope of Validation	3	6			9
Field Development Plan		1			
<b>TOTALS</b>	<b>17</b>	<b>17</b>		<b>1</b>	<b>40</b>

## **Inspections**

There were five inspections conducted in August. Issues included:

- High noise levels in temporary offices
- Temporary refuge HVAC testing
- Performance standards for emergency response drills
- Certification of fast rescue craft used to lift personnel
- Adequacy of flow rate and throw from fire-fighting monitors

## **Incidents and complaints**

There were 32 incidents and one complaint (regarding two distinct issues) in total. These comprised 29 dangerous occurrences, one serious injury and two lost time injuries - a selection of these are noted below.

### Major incidents include:

- One foot injury from dropped object
- One dropped object
- One electrical fire
- One electric shock

### Significant incidents included:

- Three finger crush injuries
- Nine unplanned events; 8 alarm/ musters and one medi-vac
- Six "damage to safety-critical equipment"; 83% involved valves
- Two crane operator incidents
- One spill – petroleum liquid release (~735 L)

### Complaints include:

- Equipment non-compliance
- Lack of communication ( management to staff)

**Enforcement**Four Written Advice/Warnings were issued:

- One for ineffective management of corrective/preventative actions
- One for ineffective internal audit system
- Two failures to submit written reports within time restriction

Four Improvement Notices were issued:

- Two for the use of 240 V power tools outside accommodation
- One for the crawler crane slew control
- One requiring a failure mode effects analysis (FMEA) for Gantry crane hoist system

One Prohibition Notice was issued:

- regarding crane access

**Subscribe**

[Past issues of this newsletter](#)<sup>11</sup> are available from the NOPSA website. Operators and other employers are encouraged to circulate this newsletter to their workforce. Please add your details to our [distribution list](#)<sup>12</sup> to receive future copies of this newsletter.

**Find out more**

<sup>1</sup> <http://www.nopsa.gov.au/alert/>

<sup>2</sup> <http://www.nopsa.gov.au/document/N-04200-PL0286%20-%20Validation.pdf>

<sup>3</sup> <http://www.nopsa.gov.au/operator.asp#nomination>

<sup>4</sup> <http://www.nopsa.gov.au/document/N-01000-FM0008%20-%20Facility%20Operator%20Nomination.dot>

<sup>5</sup> <http://www.nopsa.gov.au/document/N-01000-GL0007%20-%20Criteria%20for%20Registration%20Decision.pdf>

<sup>6</sup> <http://www.nopsa.gov.au/presentation/>

<sup>7</sup> <http://www.nopsa.gov.au/presentation/>

<sup>8</sup> <http://www.nopsa.gov.au/document/Presentation%20-%20Key%20Performance%20Indicators.pdf>

<sup>9</sup> [http://www.nopsa.gov.au/safety\\_performance.asp](http://www.nopsa.gov.au/safety_performance.asp)

<sup>10</sup> <http://www.nopsa.gov.au/alert/>

<sup>11</sup> [http://www.nopsa.gov.au/CEO\\_emails/index.asp](http://www.nopsa.gov.au/CEO_emails/index.asp)

<sup>12</sup> [info@nopsa.gov.au](mailto:info@nopsa.gov.au)