

**From CEO John Clegg**

From time to time we need to remind ourselves about the offshore occupational health and safety regime we all work in. An information paper on the offshore OHS legislative framework, now available on our website, explains the OHS regime in a concise way.

A significant principle underlying the legislation is that the primary responsibility for ensuring health and safety lies with those who create the risks and those who work with them.

This is why the operator of the facility bears the principal duty in the regime. The duty is for the operator to take all reasonably practicable steps to ensure the facility and its activities are safe and without risk to health.

Finally, under the international heading of the newsletter you will note there have been some recent serious incidents involving loss of life in the global offshore oil and gas industry. These serve as a warning that we work in an industry where complacency has no place – there are ever present risks and we need high quality safety leadership at all levels of every organisation involved in the industry.

Industry matters

Warning on engine room fire on MODU in Australian waters

A [safety alert](#)¹ issued by NOPSA following an engine room fire on a mobile offshore drilling unit in Australian waters highlights the need for pre-job planning, management of change and job safety analysis. Prompt action ensured there was no escalation of the fire. There were no injuries and the MODU was able to return to normal operations. The cause of the fire was lube oil spraying from a disconnected lube oil pipe onto a hot exhaust pipe. NOPSA's safety alert examines what went wrong and emphasises that supervisors should satisfy themselves that their crews are competent to carry out the tasks given to them. The alert is available on the NOPSA website. To subscribe to receive future alerts contact us at info@nopsa.gov.au

Asbestos management arrangements emphasised

As mentioned in an earlier issue of this newsletter, where facilities are known to have 'in-situ' asbestos, NOPSA has committed to carry out an inspection within 2-6 weeks of that facility arriving in Australian waters with the management of asbestos as a targeted topic.

NOPSA regulates the management of asbestos on offshore facilities by assessing the facility safety case and then inspecting to verify that the operator is complying with the commitments in it. The safety case must contain a detailed description of the arrangements in the Asbestos Management Plan.

The use of all asbestos material is prohibited except for certain permitted circumstances. One of these is the use of asbestos in products that are 'in situ' or fixed or installed in a way that does not constitute a risk to users until the asbestos contained in the product is disturbed. NOPSA has published a guideline on [asbestos management](#)² that explains the regulations.

If the operator of the facility is not complying with its commitments in the safety case and the regulations, NOPSA may take enforcement action.

When to report spills

NOPSA occasionally receives reports from operators and titleholders relating to uncontrolled releases of petroleum liquids into the sea. While these incidents may be reportable to environmental regulators, they do not all need to be reported to NOPSA which has no jurisdiction over environmental matters. The criteria for reporting to NOPSA includes an uncontrolled release of petroleum liquids exceeding 80 litres. Such a release, which could consist of condensate or crude oil, would have safety implications and is therefore reportable to NOPSA. The [criteria](#)³ for notifying and reporting incidents to NOPSA can be found on the NOPSA website.

Contractors have duties of care

The operator of a facility is the main duty holder under the offshore petroleum OHS legislation (*Offshore Petroleum Act 2006*). In addition to operators other parties have duties under the legislation. These are: people in control of parts of a facility or particular work; employers, manufacturers, suppliers, installers of plant and persons in general. The employers' duties include the requirement to take all reasonably practicable steps to protect the health and safety of employees at a facility as well as duties in relation to contractors. Contractors who are not operators can fall under one of the above categories as providers of labour or as employers and therefore have duties of care under the legislation. Contractors comprise approximately 70 per cent of the offshore workforce.

In practice, NOPSA inspectors include contractors' safety arrangements in their offshore inspections, and where appropriate have taken enforcement action against some contractors. Inspection activities would include assessment of contractors' training and competency schemes, management of noise and fatigue, and maintenance of safety critical equipment.

Scope of Validation – timing of agreement

Late agreement on the scope of validation has the potential to delay safety case decision-making. The scope of validation must be agreed before submission of the safety case. The validation process must be completed before NOPSA can make a decision on the safety case. Operators of facilities are encouraged to undertake early discussions with NOPSA on this issue. [Policy](#)⁴ and [guidance documents](#)⁵ on this topic are available on the NOPSA website.

Play your part in Safe Work Week

Safe Work Australia Week will be held from 19 to 25 October. You can visit the [Australian Safety and Compensation Council \(ASCC\) website](#)⁶ to get ideas for safety activities, download the employer kit to assist you in organising your workplace events and order free promotional products to give to your staff.

Safety Alert highlights diver safety

NOPSA has issued a new safety alert on [diver safety](#)⁷ prompted by two recent commercial diving incidents which led to divers being given therapeutic decompression treatment. Commercial diving incidents requiring therapeutic decompression treatment are comparatively rare in Australian waters. The safety alert highlights the unpredictable nature of decompression sickness and the importance of ensuring the immediate availability of facilities to provide decompression treatment. Even when the diving tables have been correctly followed, incidents requiring therapeutic decompression treatment can still occur.

Cyclone season approaches

October is the beginning of the cyclone season. NOPSA encourages operators of facilities to discharge their responsibility both individually and jointly in relation to emergency response planning, with particular attention to the capacity to evacuate large numbers of people from remote locations within short time frames in the face of developing adverse weather.

Operators of disconnectable facilities should take specific steps to ensure their equipment and their manning arrangements are adequately prepared for the cyclone season. NOPSA's [sailaway checklist](#)⁸ is a useful starting point for these activities.

Learn by example

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

GOOD PRACTICE



Platforms and railings on each section of the BOP eliminate the need for man-riding and reduce the risk of fall injuries.



This ladder offers good fall protection because it has a 'back scratcher' frame as well as a fixed line for use with a safety harness.

BAD PRACTICE



No fall protection on this ladder.

International

Investigation underway into helicopter crash on rig off Dubai

Petrofac, an international oil and gas facilities service provider, reports that the Dubai Police and the General Civil Aviation Authority of Dubai have initiated an investigation into an incident on September 4 where an Aerogulf Bell 212 helicopter crashed onto the deck of a jack-up drilling rig during take-off. The helicopter broke up and fell into the sea. There were no survivors amongst the two crew and five passengers.

Immediately following the incident a fire broke out on the main deck of the drilling rig, Maersk's, *Resilient*, which was quickly contained and extinguished. All operations on the Rashid field about 70 kilometres offshore from Dubai were suspended following the incident.

Offshore platforms destroyed in Gulf of Mexico

Despite initiatives undertaken after earlier hurricanes, Katrina and Rita, NOPSA notes the impact that the recent Hurricane Ike has had on facilities in the Gulf of Mexico. Ike is believed to have destroyed at least 10 offshore platforms and damaged some of the pipelines in the region.

Three years ago, Hurricane Katrina destroyed 44 platforms – followed shortly after by Hurricane Rita which destroyed 64.

Fatalities occur in pipelay accident

A mechanical failure on a [crane on the pipelay vessel](#)⁹ Saipem 7000 is believed to be behind an accident which killed three workers, badly injured four and left one unaccounted for. The accident occurred during work on the Medgaz pipeline linking Spain and Algeria. The pipe is believed to have fallen on the workers as it was being positioned ahead of being laid.

Website

Paper helps to explain OHS legislation framework

An [information paper](#)¹⁰ focusing on the Australian legislative framework for OHS in the offshore petroleum industry is available on the NOPSA website. The paper explains the aspects of the legislation and the role of the regulator and sums up the current legislative requirements as follows: “... the regime under the Australian offshore OHS laws is a performance-based regime where the safe operation of the facility is the responsibility of the operator. It is regulated by a government inspectorate using the safety case as the basis for the operator’s permission to operate.”

FAQs available

A series of [leaflets in the Frequently Asked Questions format](#)¹¹ explaining key concepts in the offshore health and safety regulatory regime and NOPSA’s role are available on the NOPSA website. Hard copies can be ordered from info@nopsa.gov.au Current titles include: *Improvement & Prohibition Notices; What is a Safety Case?; 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.*

NOPSA inspector, Stuart Allison (right) displays some of the leaflets



Regulatory activities

As at 24th September 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

September 2008 Assessment Type	Submitted	Accepted / Completed	Rejected	Exemption	Being Assessed
Safety Case NEW	2				10
Safety Case REVISED	3	3	1		16
Safety Case OTHER					
Pipeline SMP NEW					1
Pipeline SMP REVISED					
Proposed PMP					3
Diving SMS	2				3
Diving Project Plan					
Scope of Validation	3	3			6
Field Development Plan	1	1			
TOTALS	11	7	1	0	39

Inspections

Seven inspections were conducted in September. Issues included:

- Monitoring and auditing of Job Safety Analyses
- Drawings and documentation not controlled or updated
- Induction training and familiarisation for specific positions
- Condition of cranes
- Maintenance and repair of safety critical equipment
- HSR/Safety Committee
- Identification of safety -critical elements within maintenance systems
- Identification of hazardous area electrical equipment
- Verification of the commitments regarding operator nomination

Incidents and complaints

There were 22 incidents and one complaint (about multiple facilities) in total.

The incidents included 18 Dangerous Occurrences and four Lost Time Injuries.

Some of the Major incidents included:

- Serious injury occurred when a roustabout was struck by a load
- Two fires – one engine room and one foam deluge pump
- One dropped object
- One lack of physical isolation during electrical work

Some of the Significant incidents included:

- Two diving lost time injuries
- One chemical burn lost time injury
- One finger injury resulting in lost time
- Five incidents causing damage to safety-critical equipment
- One gas release
- Five alarms leading to muster

Complaints included:

- Electrical technicians not meeting training standards

Enforcement

One Written Advice/Warning was issued:

- For non-compliance with the safety case in relation to the frequency of offshore visits

Five Improvement Notices were issued:

- One for failure to maintain equipment
- One for failure to implement the emergency response plan
- One for failure to adequately train crew
- Two for failure to manage vibration-induced fatigue of pipework

No Prohibition Notices were issued

Subscribe

[Past issues of this newsletter](#)¹² 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](#)¹³ to receive future copies of this newsletter.

Find out more

¹ <http://www.nopsa.gov.au/alert/>

² <http://www.nopsa.gov.au/document/N-09000-GL0254%20-%20Asbestos%20Management.pdf>

³ <http://www.nopsa.gov.au/document/N-03000-GL0099%20-%20Notification%20and%20Reporting%20of%20Accidents%20and%20Dangerous%20Occurrences.pdf>

⁴ <http://www.nopsa.gov.au/document/N-04200-PL0286%20-%20Validation.pdf>

⁵ <http://www.nopsa.gov.au/document/N-04200-GL0525%20-%20Validation.pdf>

⁶ <http://www.ascc.gov.au/ascc/SafeWorkAusWeek/SafeWorkAusWeek2008/>

⁷ <http://www.nopsa.gov.au/alert/>

⁸ <http://www.nopsa.gov.au/document/N-02000-FM0387%20-%20Readiness%20to%20Sail%20Away%20Checklist.pdf>

⁹ <http://www.upstreamonline.com/live/article163313.ece>

¹⁰ <http://www.nopsa.gov.au/regs.asp>

¹¹ <http://www.nopsa.gov.au/#shorts>

¹² http://www.nopsa.gov.au/CEO_emails/index.asp

¹³ info@nopsa.gov.au