

**From CEO John Clegg**

The management of competence is vital to improving occupational health and safety performance. This is why it is NOPSA's practice on every planned inspection to require inspectors to include competence as a topic. Competence issues also form an important aspect of our ongoing National Programme inspections.

Following the report of the Independent Review Team into NOPSA's operations this year, the safety authority has carried out a review of its inspection activities relating to competence to identify any common themes that could be shared with industry.

Two main issues emerged. Firstly, the poorest performers had no effective systems for managing competence or none at all. Secondly, there is a need to ensure that competence in safety critical tasks is audited to ensure the person identified as having the competence to do a task can actually perform it adequately. This is especially true of tasks done infrequently, such as emergency response procedures.

NOPSA recognises that high rates of employee turnover are an issue in certain parts of the industry. However, this makes it even more vital that effective and well-resourced competence management systems are in place so that everyone working offshore is competent to do their job in a safe and effective manner.

Industry matters

Need for emphasis on promotion of health and safety

NOPSA was recently the subject of an independent review after its first three years of operation as required by legislation. The review team found that good progress had been made in building a safety regulatory regime and authority of world class calibre. There were 20 recommendations made by the team – seven for NOPSA to address, six matters for the Commonwealth Department of Resources, Energy and Tourism and seven for industry attention.

One of the prominent recommendations for NOPSA to address was the need for a greater emphasis on promotional activities in order to continue to improve occupational health and safety in the offshore petroleum sector.

Following this promotional path means NOPSA will be seeking to work more collaboratively with industry participants – to engage and inform, as well as educate and create dialogue.

Current activities which can be considered as promotion include the development of detailed and relevant safety case guidance notes to assist industry to meet regulatory requirements with avenues for industry to comment and give feedback. The formation of a tripartite liaison group will also be a key part of our efforts to work collaboratively with participants in the offshore industry. Invitations to participate in this new NOPSA Liaison Group have been sent out and the group will meet early next year.

Comment sought on guidance notes

There has been an encouraging level of interest in the NOPSA safety case guidance note project and the opportunity for industry to workshop the guidance notes. NOPSA intends to run an initial series of workshops early next year to finalise the first three guidance notes. The first documents are currently on our website for [comment and discussion](#)¹. Please review and forward any comments you may have as the period for comment is closing soon.

Workshop on international standards for oil and gas personnel

Registrations are invited for the two-day [International Standards Workshop](#)² for the Oil & Gas Industry in Australia to be held from 19-20 February at the Perth Convention Centre. The workshop is being held by the International Association of Oil and Gas Producers (OGP) in association with the Australian Petroleum Production and Exploration Association (APPEA), NOPSA and Standards Australia. It promises to broaden understanding of international standardisation activities in the industry and improve understanding of how Australian and New Zealand standards fit into the overall international standards coverage.

February exhibition for Australasian petroleum industry

NOPSA will be among exhibitors at the Australasian Oil and Gas 2009 Conference and Exhibition to be held in Perth from 17-19 February. Industry participants can [register](#)³ for free passes to attend the exhibition.

Safety promotion vital for organisations

Recent Independent Review Team recommendations included advice to industry participants to do more to involve the offshore workforce in the promotion of safety improvements and to entrench a positive safety culture in every workplace.

NOPSA supports the emphasis on safety culture and in addition to our core activities, we aim to proactively seek ways of keeping the workforce involved and aware of issues we are tackling.

Examples of this include:

- CEO Newsletter – our monthly communication update delivered to over 500 industry participants
- Boot Room News – leaflet on offshore health and safety aimed at the workforce
- Information [leaflets](#)⁴ (under “Short Questions and Answers”) explaining aspects of the occupational health and safety legislation in an accessible format
- NOPSA Liaison Group comprising NOPSA, industry associations and participating unions will provide a forum for sharing information to promote improved standards of health and safety and provide advice to the NOPSA CEO on the regulatory framework

- NOPSA supports the Health and Safety Representatives' Forum where workforce members are encouraged to identify significant health and safety issues and suggest improvement programmes.
- As part of NOPSA's offshore inspections the authority's inspectors always meet with facility management and also with health and safety representatives in order to share understanding of the regime and hear any concerns that HSRs may have
- NOPSA sponsors an internet-based [bulletin board](#)⁵ for the use of HSRs working offshore

Workforce consultation and participation is emphasised in the occupational health and safety legislation. A workforce that is actively engaged in all aspects of safety performance is essential to improve the safety culture of a company. Studies of safety culture point to a complex interaction between individuals and the organisations they work within.

Changes to Offshore Petroleum Act

The primary legislation governing petroleum activities across offshore Australia has been renamed the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGSA) to reflect changes to the legislation regarding greenhouse gas storage. Formerly the legislation was known as the *Offshore Petroleum Act 2006* (OPA). The changes will result in some changes to the numbering of the sections of the Act referring to occupational health and safety, however individual regulations will not be affected at this time.

Stakeholder relations

Offshore crane operator competency discussed

The first meeting of the offshore crane operators competency working group was held in Perth recently. The group consists of representatives from the Maritime Union of Australia and the Australian Workers Union, NOPSA and the Australian Maritime Safety Authority as well as industry groups including the Australian Petroleum Production and Exploration Association, the International Association of Drilling Contractors and the International Marine Contractors' Association.

The working group which has been convened by the Commonwealth Department of Resources, Energy and Tourism is expected to report to the Minister for Resources and Energy by the middle of 2009 on issues relating to high risk work (crane operations, rigging and dogman) including training frameworks, licensing of high risk operations and application of appropriate standards.

Learn by example

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

GOOD PRACTICE



Clearly labelled testing data makes it easier for the operator to maintain the integrity of facility equipment.

BAD PRACTICE



The importance of regular testing of fire fighting equipment is shown here with a system failing to produce adequate pressure during a test. Diagnosis of the problem and rectifying the flow took about ten minutes – valuable time to lose in the event of a fire.

BAD PRACTICE (cont.)

Combustibles such as cardboard under escape stairs to temporary refuge (TR) could pose a fire hazard and impair evacuation



Fire extinguisher located inside paint store (behind cardboard boxes) makes access difficult in the event of an emergency

International**Accidental CO₂ release from fire suppression system offshore UK**

An unintentional activation of the carbon dioxide (CO₂) fire suppression system on the merchant ship Figaro occurred in December 2007, off the UK coast. The causes of the incident were linked to unsuccessful maintenance carried out two weeks previously. Crew in the affected compartments were able to escape without injury but the CO₂ gas caused the main engine and auxiliary generator to shut down and a rescue operation of the vessel had to be mounted. A [report](#)⁶ examining this incident has been compiled by the UK Marine Accident Investigation Branch (MAIB). There have been 11 accidents on vessels of 500gt or more reported to the MAIB involving the unintentional release of CO₂ between 1993 and 2007.

The report highlights the importance of appropriate maintenance of these systems not only to enable their primary function of fire suppression but also to reduce the risk of unintentional release. The unintentional release of CO₂ is a risk for many offshore facilities as well as marine vessels.

Latest findings on pool fires from the UK Health and Safety Executive

Initial experimental work at the Health and Safety Laboratory at Buxton in the UK has indicated that pool fires not contained by a bund are liable to cause severe deck plate buckling and possible weld shear. This has highlighted a failure mode that is not generally taken into account when pool fires are analysed in a fire hazard assessment within an offshore safety case.

Running pool fires are burning pools of liquid that are unrestrained by any wall or bund and are hence able to move depending on the surface gradient. Severe buckling of the steel plate has been observed during all the pool fires tests. During the experiment it was significant that the degree of deformation of the deck plate was sufficient to raise it upwards by about 200 mm and to fail both fully welded deck seams and stitch welds. In one case, burning fuel was able to flow through a split in the deck. The implications are:

- Deck splitting could cause a vertical fire spread and associated escalation not currently modelled in safety cases
- Deck buckling could cause pool fires to continually move across deck plates as they buckle in an unpredictable manner

The HSE has produced an [information sheet](#)⁷ that provides guidance on modelling of pool fires hazards on steel decking.

Vital to keep watertight doors maintained

A [safety alert](#)⁸ issued by the US Coast Guard demonstrates the importance of properly maintaining and closing watertight doors on all offshore vessels and facilities. This alert points to one of the contributory factors in a recent marine casualty on a commercial fishing vessel being the failure to properly maintain and keep closed watertight doors on the vessel's weather deck. In this incident, one watertight door was not properly dogged down, permitting it to open and let water flood a space below the main deck.

Website

Competency issues

As discussed in the CEO's comments earlier, recommendations on [competency issues](#)⁹ arising from NOPSA planned inspections are now available on our website.

Regulatory activities

As at 26th November 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

November 2008					
Assessment Type	Submitted	Accepted / Completed	Rejected	Exemption	Being Assessed / Negotiated
Safety Case NEW	4				14
Safety Case REVISED	2	3			8
Safety Case OTHER					
Pipeline SMP NEW					1
Pipeline SMP REVISED	1				1
Diving SMS					
Diving Project Plan					
Scope of Validation	2	2			9
Field Development Plan	2				2
Advice	3				3
TOTALS	14	5	0	0	38

Inspections

Nine inspections were conducted in November. Some of the issues included:

- Maintenance backlog, preventative maintenance and audits
- Corrosion and Rust
- Food safety, management and audits
- Condition of mothballed platforms
- Guano
- Hazardous materials registers
- Accommodation
- Crane maintenance
- Implementation of Noise Management Plan

Incidents and complaints

There were 29 incidents and two complaints.

The incidents included 26 dangerous occurrences, one serious injury and two lost time injuries

The major incidents included:

- Two fires – engine exhaust pipe and accommodation insulation (welding-related)
- One serious injury – fractured wrist

Some of the significant incidents included:

- Two lost time injuries – finger crush and galley burn
- Three gas releases
- Four could have caused LTIs – two involving fingers, one face injury, one dropped object
- Six incidents causing damage to safety-critical equipment
- Seven alarms leading to muster
- One medivac

The complaints included:

- Equipment used for crane repairs
- Assurance of qualifications for helicopter pilots

Enforcement

No improvement notices were issued.

No prohibition notices were issued.

Subscribe

[Past issues of this newsletter](#)¹⁰ 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](#)¹¹ to receive future copies of this newsletter.

Find out more

¹ <http://www.nopsa.gov.au/projects.asp>

² <http://www.nopsa.gov.au/downloads/Programme%20-%20International%20standards%20workshop%20February%202009.pdf>

³ http://www.infosalons.com.au/oilandgas09p/register.asp?utm_source=3rdPartyEDM&utm_medium=Email&utm_campaign=EAOG0912

⁴ <http://www.nopsa.gov.au/>

⁵ <http://www.hsronline.com.au/>

⁶ http://www.maib.gov.uk/cms_resources/Figaro_report.pdf

⁷ <http://www.hse.gov.uk/offshore/infosheets/is9-2008.pdf>

⁸ http://www.nopsa.gov.au/alert/selected/selected_04.pdf

⁹ <http://www.nopsa.gov.au/document/Memo%20-%20Competence%20Themes%2001-11-2008.pdf>

¹⁰ http://www.nopsa.gov.au/CEO_emails/index.asp

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