



OPERATOR LIAISON MEETINGS

POLICY

APPROVED FOR PUBLICATION

1. Purpose

This policy document provides an overview of the general principles that the National Offshore Petroleum Safety Authority (NOPSA) applies in relation to liaison meetings with operators and prospective proponents for offshore petroleum and greenhouse gas storage operations.

The operator of a facility is the person who is registered as the operator of a facility in accordance with the regulations. Facilities also include licensed pipelines.

Operator liaison forms part of NOPSA's legislated function to promote OHS of persons engaged in offshore petroleum operations, or offshore greenhouse gas storage operations, in accordance with s. 646 (c) of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006*. Operator liaison is also an important tool for providing advice [s. 646 (f)] and for monitoring operator progress against inspection recommendations and actions resulting from accidents or dangerous occurrences [s. 646 (d)]. Other potential duty holders (e.g. titleholders, persons in control of parts of a facility or particular work, etc.) may also participate in liaison meetings, at the request of either party (i.e. NOPSA or the operator).

Primarily, operator liaison is used to facilitate the flow of information. Operator liaison relies on voluntary involvement of operators (and any other relevant duty holders), and is therefore not a forum for applying OHS inspector powers. NOPSA's Investigation Team generally acts independently of the Assessment and Inspection Team, however may get involved in operator liaison meetings on an as-needs basis.

Definitions and abbreviations used in this document can be found in NOPSA's Glossary of terms for Regulatory Operations – N-09000-GL0326 Glossary – Regulatory Operations.

2. Relevant Legislation

Offshore Petroleum and Greenhouse Gas Storage Act 2006

Offshore Petroleum and Greenhouse Gas (Safety) Regulations 2009

Similar provisions apply in coastal waters where States/NT have made legislation that mirrors Commonwealth legislation. In general, references to regulatory requirements in the material provided below are in relation to Commonwealth legislation.

3. Operator Liaison

It is NOPSA policy to conduct regular liaison meetings with operators of facilities (including pipelines) that it regulates. Operator liaison meetings not only contribute to fulfilling NOPSA's legislated function of OHS promotion, but are also an important mechanism for the provision of advice to the operator, and for monitoring the operator's ongoing OHS performance and compliance with the listed OHS laws. Liaison with prospective operators during the early stages of a project development is also encouraged.

3.1 Frequency of Operator Liaison Meetings

It is NOPSA policy to conduct operator liaison meetings with each operator of an 'active' facility at least once per year, where this is reasonably practicable. The appropriate frequency of operator liaison meetings will depend largely on the level of activity of the operator, the number of facilities, the complexity of the facilities, etc. The Standard Operating Procedure *Operator Liaison Meetings* (N-06000-SOP0750) lists the factors which should be taken into consideration when deciding on an appropriate operator liaison meeting frequency.

3.2 Agenda Items for Operator Liaison Meetings

Operator liaison meetings should address a selection of standard agenda items as detailed in Standard Operating Procedure *Operator Liaison Meetings* (N-06000-SOP0750). These can be varied on a case-by-case basis, depending on the particular circumstances of the operator and the involvement of third parties in these meetings. For example, liaison meetings which involve other regulators may address a range of additional agenda items.

Examples of typical liaison meeting agenda items include safety case submissions, progress on actions arising from inspection/audit recommendations, general review of accidents and dangerous occurrences, operator OHS performance, etc. Note that specific review of significant accidents and dangerous occurrences will generally be handled separately to these liaison meetings by NOPSA's Investigation Team. Where practical, the agenda should be shared and agreed with the operator prior to the meeting.

3.3 Early Engagement Liaison Meetings

Early engagement liaison meetings with prospective operators of offshore petroleum or greenhouse gas storage operations are also encouraged. Early engagement liaison not only provides the prospective operator with a better understanding of their regulatory obligations and NOPSA's expectations, but it allows for NOPSA to plan for potential future operator regulatory activities e.g. registration, scope of validation and early engagement safety case assessment, where applicable.

These liaison meetings will tend to be less structured than those described in Section 3.2 above, as these meetings address the preliminary stages of project development rather than ongoing operational activities.

3.4 Documentation of Liaison Meetings

Minutes of liaison meetings should be taken and agreed with the operator wherever practical, noting that some operators will keep their own minutes of these meetings, and are usually in a better position to provide a scribe. If operators take meeting minutes, the NOPSA inspector should review and amend, as necessary, before agreeing to the minutes. If the taking of minutes is not considered practical, or is not warranted due to the information packages provided by the operator to support the agenda, OHS inspectors are expected to document key points from these meetings and to save these as file notes in the relevant operator liaison folder in Objective.