

# Notifiable incident

**Incident ID** [6472](#)

**Duty holder:** Shell Australia Pty Ltd  
**Facility/Activity:** Prelude FLNG  
**Facility type:** Floating liquefied natural gas facility

Incident details	
<b>Division</b>	Occupational Health and Safety
<b>Notification type</b>	Information Provided
<b>Incident date</b>	10/04/2020 12:00 AM (WST)
<b>Notification date</b>	10/04/2020 12:58 PM (WST)
<b>NOPSEMA response date</b>	14/04/2020 02:21 PM (WST)
<b>Received by</b>	[REDACTED]
<b>Nearest state</b>	WA
<b>Initial category type</b> <i>(based on notification)</i>	Other
<b>Initial category</b> <i>(based on notification)</i>	Information provided to NOPSEMA
<b>3 Day report received</b>	
<b>Final report received</b>	
<b>All required data received</b>	
<b>Final category type</b> <i>(based on final report)</i>	Other
<b>Final category</b> <i>(based on final report)</i>	Information provided to NOPSEMA
<b>Brief description</b>	OHS-INFO-Shell FLNG - COVID-19 management
<b>Location</b>	
<b>Subtype/s</b>	Other

**Summary**  
(at notification)

Dear NOPSEMA

I would like to raise my concerns for the health and safety of the Shell FLNG Offshore workers in response to the COVID-19 crisis and the Shell management treatment of offshore workers.

Understand these are challenging times but Shell company is applying rapid changes without appropriately engaging with the elected HSR's and the broader offshore employee group.

The recent decisions Shell company are making are TELL Directives which are largely driven by commercial incentives rather than Care for employees.

As an East Coast based hired employee (FIFO working), I have been intimidated and pressured by numerous phone calls and messages from representatives of the Shell company to leave my home base and temporarily relocate to West Australia. This has led to extreme stress and now family separation. I have grave concerns how this will effect my personal relationship and my overall mental health. But equally, I also share this concern for my fellow offshore colleagues and the impact on their families.

Shell Company without a true consultation process via the HSR group, are going to implement a roster change which does not provide a fair balance of Work rostered time against rostered off time. Moving from the current 3/4/3/5 roster to a 2/4/2 or more correctly put, 6/2 roster. (2 weeks company directed quarantine, 4 weeks offshore, 2 week rostered time off).

It should be noted, the 2weeks company directed quarantine has the equivalent strict restrictions required by the Federal Government if a member of the public was issued a direction to self isolation. The quarantine restrictions the Shell company are expecting for all offshore employees shall be completed prior to mobilising offshore and is expected by company to be completed by the employee in their own time and without compensation for lost time.

The combination of very strict quarantine requirements and the 4 weeks offshore reduces the ability for employees to connect with their family and loved ones from the current 60% family connection down to 0% to 25%. 0% is for unaccompanied East Coast based employees where family members could not move to West Australian.

My concerns are;

1. The changes Shell Company are making haven't been appropriately discussed with the HSR's and the offshore workforce. Inappropriate consultation process.

2. Employees have been aggressively intimidated to make forced decisions based on wrong information provided by company to employees about WA government border closures for FIFO workers. Also intimidating employees using the low oil price environment as a pressure point, which in this case is not an influencing factor as LNG cargoes are already commercially agreed in advance regardless of the current crude oil price.

3. No appropriate risk assessment conducted to provide a fair WORK / LIFE balance for offshore employees to reconnect with their family and loved ones as well as a reasonable time away for the work environment and work influences.

4. Disregard for true employee care.

5. The risk of increased mental health due to family separation, isolation from the community and strict company imposed quarantine which are not aligned with common sense guidelines provided by the Federal Government and Federal Chief Medical Officer for social distancing and stay at home guidance to minimise communal transmission.

In summary

I have a genuine concern for myself and my fellow colleagues that the Shell company is putting the Prelude Asset before the holistic genuine health and safety of all the offshore employees.

Could NOPSEMA please initiate immediately an investigation into Shell actions and request an immediate engagement with the Prelude HSR group for employee feedback.

<p><b>Details</b> (from final report)</p>	<p>Dear NOPSEMA</p> <p>I would like to raise my concerns for the health and safety of the Shell FLNG Offshore workers in response to the COVID-19 crisis and the Shell management treatment of offshore workers.</p> <p>Understand these are challenging times but Shell company is applying rapid changes without appropriately engaging with the elected HSR's and the broader offshore employee group.</p> <p>The recent decisions Shell company are making are TELL Directives which are largely driven by commercial incentives rather than Care for employees.</p> <p>As an East Coast based hired employee (FIFO working), I have been intimidated and pressured by numerous phone calls and messages from representatives of the Shell company to leave my home base and temporarily relocate to West Australia. This has lead to extreme stress and now family separation. I have grave concerns how this will effect my personal relationship and my overall mental health. But equally, I also share this concern for my follow offshore colleagues and the impact on their families.</p> <p>Shell Company without a true consultation process via the HSR group, are going to implement a roster change which does not provide a fair balance of Work rostered time against rostered off time. Moving from the current 3/4/3/5 roster to a 2/4/2 or more correctly put, 6/2 roster. (2 weeks company directed quarantine, 4 weeks offshore, 2 week rostered time off).</p> <p>It should be noted, the 2weeks company directed quarantine has the equivalent strict restrictions required by the Federal Government if a member of the public was issued a direction to self isolation. The quarantine restrictions the Shell company are expecting for all offshore employees shall completed prior to mobilising offshore and is expected by company to be completed by the employee in their own time and without compensation for lost time.</p> <p>The combination of very strict quarantine requirements and the 4 weeks offshore reduces the ability for employees to connect with their family and love ones from the current 60% family connection down to 0% to 25%. 0% is for unaccompanied East Coast based employees where family members could not move to West Australian.</p> <p>My concern are;</p> <ol style="list-style-type: none"> <li>1. The changes Shell Company are making haven't been appropriately discussed with the HSR's and the offshore workforce. Inappropriate consultation process.</li> <li>2. Employees have been aggressively intimidated to make forced decisions based on wrong information provided by company to employees about WA government boarder closures for FIFO workers. Also intimidating employees using the low oil price environment as a pressure point, which in this case is not an influencing factor as LNG cargos are already commercially agreed in advance regardless of the current crude oil price.</li> <li>3. No appropriate risk assessment conducted to provide a fair WORK / LIFE balance for offshore employees to reconnect with their family and love ones as well as a reasonable time away for the work environment and work influences.</li> <li>4. Disregard for true employee care.</li> <li>5. The risk of increased mental health due to family separation, isolation from the community and strict company imposed quarantine which are not aligned with common sense guidelines provided by the Federal Government and Federal Chief Medical Officer for social distancing and stay at home guidance to minimise communal transmission.</li> </ol> <p>In summary I have a genuine concern for myself and my fellow colleagues that the Shell company is putting the Prelude Asset before the holistic genuine health and safety of all the offshore employees.</p> <p>Could NOPSEMA please initiate immediately an investigation into Shell actions and request an immediate engagement with the Prelude HSR group for employee feedback.</p>
<p><b>Immediate cause/s</b></p>	<p>N/a</p>
<p><b>Root cause/s</b></p>	
<p><b>Root cause description</b></p>	

Duty inspector recommendation	
Date	14/04/2020
Duty inspector	[REDACTED]
Recommendation	Do not conduct Major Investigation
Reasoning	Not applicable
Supporting considerations	

Major investigation decision	
Date	14/04/2020
Decision	Do not conduct Major Investigation
Reasoning	Not applicable
Supporting considerations	

Non-major investigation review and recommendation	
Date	20/04/2020
Inspector	[REDACTED]
Risk gap	
Type of standard	
Initial strategy	

Recommended follow up strategy	
Recommended strategy	Inclusion in annual report stats / data analysis
Supporting considerations	This has been provided as "information supplied to NOPSEMA". The issue raised is in relation to mental health impacts associated with the revised roster and potential relocation arrangements, and perceived lack of consultation with the workforce. The risk gap is assessed to be Nil/Nominal using the NOPSEMA SOP for non-major investigations, therefore the recommended strategy has been classified as "Inclusion in annual report status / data analysis". However, there have been multiple submissions to NOPSEMA referencing concerns with revised roster and relocation arrangements. This and other related concerns will be included for discussion in the upcoming COVID-19 consequence inspection with Shell on 1 May 2020 (Ref. Inspection 2220).

Non-major investigation decision	
Date	21/04/2020
RoN	[REDACTED]
RoN review result	Disagree with recommendation
Strategy decision	Investigate
Supporting considerations	To be included for discussion in the upcoming COVID-19 consequence inspection with Shell on 1 May 2020 (Ref. Inspection 2220)

Associated inspection	
Inspection ID	<a href="#">2220</a>