

Contents

From the CEO	1
CEO profile	2
Addressing stakeholder concerns on consultation	3
Cleaning and sanitising kitchens and galleys	4
Financial assurance draft guideline now available	5
Environment plan levies for title applicants	6
Good personal safety doesn't necessarily mean good process safety	7
Recent changes to the OPGGS Act	8
Environment inspections post 1 October 2014	8
New Diving Project Plan (DPP) Concordance Table	9
Environmental input in oil pollution response arrangements	10
Science in complex environmental decisions	11
Fibre reinforced plastic (FRP) deck gratings	12
Notification of accidents and dangerous occurrences	13
New 'Oil pollution risk management' information paper	13
Data reports and statistics	14
Schedule of events	14
Glossary of acronyms	

From the CEO

As the recently appointed CEO I have joined the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) during a period of significant change.



Three years ago NOPSEMA was known as the National Offshore Petroleum Safety Authority (NOPSA) when its powers and functions were expanded to include the regulation of well integrity and well-related activities. On 1 January 2012, the regulation of environmental management was added to the authority's remit, and NOPSA became NOPSEMA. That was followed with Victoria conferring its functions for the regulation of OHS and well integrity in Victorian state waters on NOPSEMA in 2013 and earlier this year NOPSEMA became the sole environmental regulator for petroleum activities in Commonwealth waters.

Since commencing in September I have been meeting leaders and representatives from industry, the workforce, stakeholder organisations and government bodies seeking feedback on the evolution and performance of NOPSEMA. The feedback, combined with the additional responsibilities allocated over recent years, confirm the high regard in which NOPSEMA is held for its technical competence and capacity to deliver outcomes-based regulation. This reputation is a credit to the influence and leadership of my predecessor, Ms Jane Cutler.

The evolution of NOPSEMA is set to continue as I have found further interest among some states and the Northern Territory for the conferral of OHS, well integrity and environmental management regulatory functions on NOPSEMA. This conferral of powers and interaction with other regulators is a key priority of mine to streamline regulatory arrangements and reduce regulatory burden.

Another priority is enhanced stakeholder engagement and I am pleased that many organisations have expressed a desire for greater interaction with NOPSEMA. Meetings with operators and stakeholders already feature in the work of NOPSEMA with around 200 stakeholder meetings having been conducted in 2014 on safety issues and a further 140 on environmental management issues. Even so, NOPSEMA will be undertaking greater engagement over the coming year, providing professional and independent advice to stakeholders on the regulatory requirements that industry must meet.

Interaction with stakeholders is also likely to be considered as part of the next operational review of NOPSEMA, scheduled for the first half of 2015. This review will build on the many reviews of NOPSEMA undertaken over recent years. I will be using findings from the operational review to guide NOPSEMA priorities and to assist industry in protecting the health and safety of offshore workers and the control of environmental impacts from petroleum activities. I encourage all stakeholders to participate in this important process.



Stuart Smith, CEO



CEO profile

Stuart Smith commenced as the new Chief Executive Officer of the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) on 25 September 2014; Australia's independent regulator of offshore safety, well integrity and environmental management of offshore oil and gas activities around Australia.

His appointment followed six years as Director General of the Department of Fisheries in Western Australia where he managed the sustainable use of aquatic resources in Western Australia and adjacent Commonwealth waters. These responsibilities included developing and regulating commercial fishing, aquaculture, recreational fishing, aquatic biosecurity and selected aquatic safety and marine park compliance functions.

Stuart also worked as a Deputy Director General and Acting Director General with the Department of Industry and Resources (DoIR) in Western Australia. As Deputy Director General for State Development he was responsible for facilitating major mining and oil and gas projects, attracting investment, and promoting trade and economic expansion opportunities in WA. As Deputy Director General for Resources he was responsible for promoting resources exploration in the state, regulating

mining activity, managing resources sector royalties and regulating oil and gas activity including onshore and offshore safety and environmental management.

Prior to joining DoIR in 2003, Stuart spent 14 years with the Australian Public Service in Canberra, Melbourne and Perth. During this period he held various industry development and regulatory roles including positions with the Industry portfolio and the Australian Competition and Consumer Commission, together with a secondment to Parliament House as an Inquiry Secretary and advisor.

Stuart holds a Bachelor of Economics degree from the University of Western Australia and a Graduate Diploma in Economics from the Australian National University.

Addressing stakeholder concerns on consultation

Recently, NOPSEMA met with a number of stakeholders to discuss consultation requirements under the Environment Regulations and address concerns around the consultation processes undertaken by some titleholders in the course of preparing an environment plan.

Over the past year NOPSEMA has received feedback from the community in relation to consultation requirements under the Environment Regulations, specifically claims that titleholders had not:

- consulted all relevant persons
- provided relevant persons with sufficient information with reasonable time to assess the possible consequences of the activity on their functions, interests or activities
- provided feedback to relevant persons that their objections or claims have been understood, considered and appropriately addressed.

To address these concerns, NOPSEMA representatives met with a number of fishing and environmental non-government organisations (ENGOS), government agencies and titleholders to:

- explain consultation requirements under the Environment Regulations
- explain the term 'relevant person' and clarify what constitutes 'appropriate' consultation
- advise third parties about how they can most effectively participate in consultation
- clarify how NOPSEMA considers consultation as part of a robust assessment process
- increase understanding and knowledge of the tools NOPSEMA has available to monitor and secure compliance.

In the feedback submitted to NOPSEMA, and in the stakeholder meetings, the authority identified a misconception among some stakeholders. The misconception was a perceived lack of transparency in the consultation process under the Environment Regulations when compared with the referral process provided for in the *Environment Protection Biodiversity Conservation Act 1999* (EPBC Act). The Environment Regulations provide a targeted consultation process for



Mr Cameron Grebe, General Manager of Environment, addressing stakeholders at the consultation meeting.

relevant persons to engage directly with titleholders during the preparation of an environment plan and provide an opportunity to discuss any objections or claims prior to the environment plan being finalised and submitted to NOPSEMA.

The EPBC Act provides a threshold test to determine whether an activity requires referral and, if it does require referral, the referral document is published on the Department of the Environment's website. Relevant persons must monitor the website to determine if proposed activities may be of interest. Experience showed that only around 15% of petroleum activities were referred for EPBC assessment.

In comparison, the Environment Regulations require an environment plan to be submitted for all offshore petroleum activities in Commonwealth waters and titleholders must identify and consult with all relevant persons by actively providing them with information that is sufficient for them to determine how the activity may affect their functions, interests or activities.

NOPSEMA is committed to maintaining open, accountable and robust relationships with industry and other stakeholders and will continue to work with stakeholders and titleholders to improve consultation effectiveness.

For more information see the *Consultation requirements under the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* information paper on the Environment Plans page under the Environment tab and the *Requirements for effective consultation on petroleum activities in Commonwealth waters* brochure on the Resources page at nopsema.gov.au.



Cleaning and sanitising kitchens and galleys

Following a recent planned inspection, NOPSEMA made recommendations to a facility operator after finding an absence of cleaning and sanitising procedures for the facility galley. Under Clause 9(2) (a) of Schedule 3 to the OPGGS Act, operators are required to take all reasonably practicable steps to provide and maintain a physical environment at the facility that is safe and without risk to health.

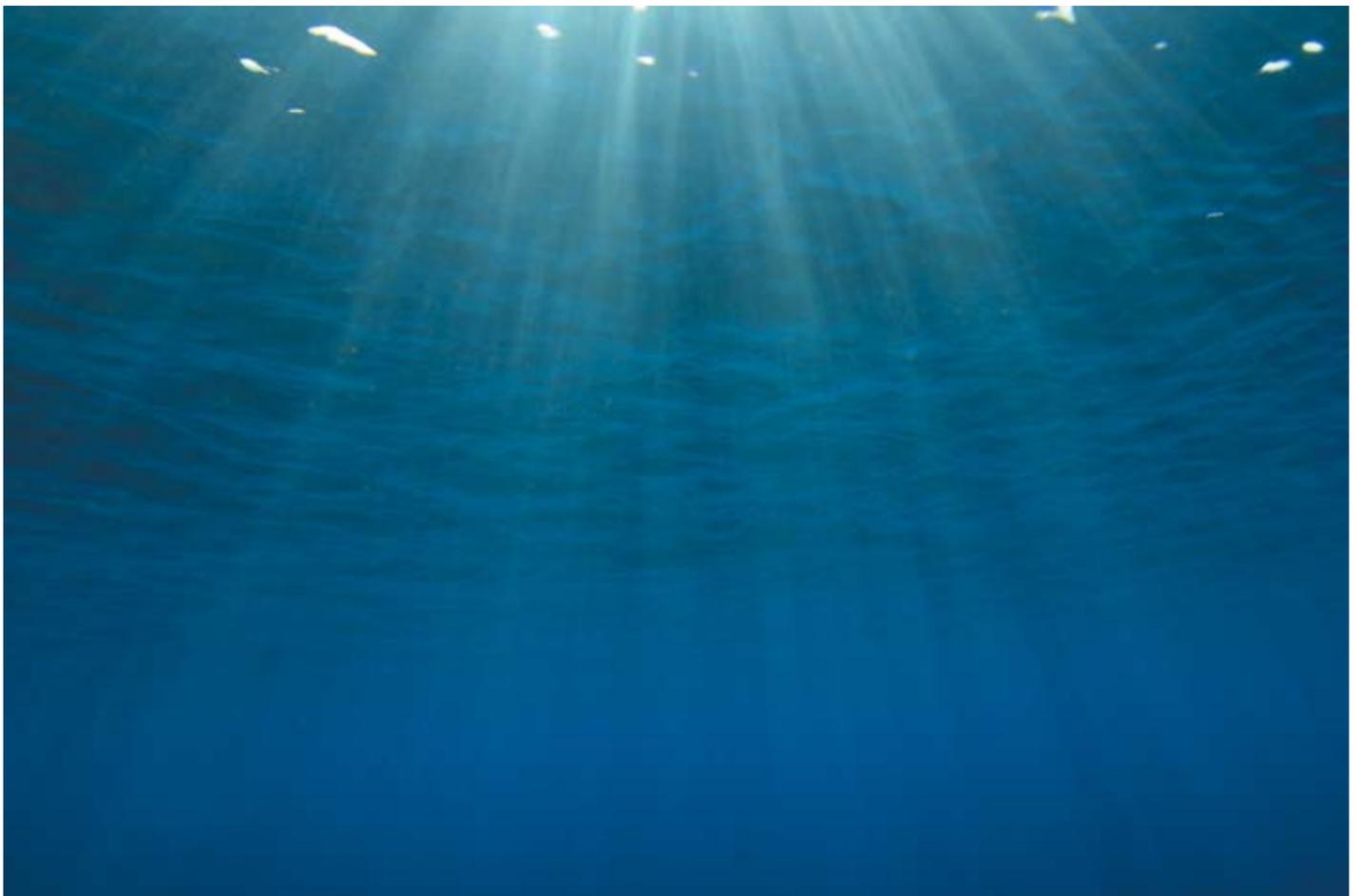
Standard 3.1.1 of the *Australia New Zealand Food Standards Code* defines 'clean' as being free of extraneous visible matter and objectionable odour. The term 'sanitary' is defined as being free of microorganisms that would permit the transmission of infectious disease or compromise food safety. Cleaning and sanitising are

two separate processes and effective cleaning must occur prior to sanitising; as sanitisers may not work if the contact surface or utensil has not had all visible contamination removed.

Cleaning is often achieved by using detergent and clean water. Detergents are chemicals that remove dirt and grease; they do not kill microorganisms. Microorganisms may be removed during the cleaning process, however, the cleaning process isn't intended to achieve this and sanitising is recommended.

Sanitisers (also called disinfectants) are substances capable of destroying microorganisms including disease-causing bacteria. When used properly they can reduce surface contamination by bacteria to a safe level. It is important to read directions on sanitisers carefully to ensure effective sanitisation. Sanitising is usually achieved by using heat and water, or chemicals, or a combination of both methods.

Operators may wish to apply the relevant requirements of national or international codes in their food safety management to ensure clean and sanitary facility galleys.



Financial assurance guideline now available

Amendments to section 571(2) of the OPGGS Act became effective on 29 November 2013. These amendments require titleholders to maintain sufficient financial assurance to meet the costs, expenses and liabilities that may arise in connection with carrying out petroleum activities.



On 1 January 2015, subject to the passage of proposed regulatory amendments, titleholders will be required to demonstrate to NOPSEMA that they meet the financial assurance requirements of section 571(2) of the OPGGS Act as a prior condition of acceptance of an environment plan. The Department of Industry has released draft financial assurance amendment regulations on its website at industry.gov.au. Comments or questions in relation to the draft regulations should be directed to the Department of Industry at offshoreregulations@industry.gov.au.

NOPSEMA has published a guideline to assist titleholders in understanding the financial assurance requirements as set out in the OPGGS Act and Environment Regulations. The guideline also describes the steps to be taken by titleholders to establish compliance with the requirements for environment plans submitted to NOPSEMA after 1 January 2015.

The Australian Petroleum Production and Exploration Association (APPEA) is currently developing a costs, expenses and liabilities estimation method to assist titleholders in calculating appropriate levels of financial assurance to ensure that they meet the legislative requirements. NOPSEMA has initiated a validation process for the APPEA method which is ongoing. The application of information in the guideline is dependent on successful validation of the APPEA method by NOPSEMA and should be read in that context.

In circumstances where titleholders wish to use a different method or where the risks presented by a particular activity fall outside the limits of the APPEA method, NOPSEMA will undertake a case by case assessment of the titleholders financial assurance estimation approach. In this circumstance titleholders are encouraged to contact NOPSEMA as soon as practicable.

For more information about financial assurance or to read the *Financial assurance for petroleum titles* guideline see the Recent changes page under the Legislation & Regulations tab at nopsema.gov.au.

NOPSEMA welcomes stakeholder feedback on the draft guideline. Feedback should be submitted via email to environment@nopsema.gov.au

NOPSEMA will be holding industry information sessions on the guideline in Perth on 12 and 13 November and Melbourne on 18 November. For further information please see the NOPSEMA Events page under the Resources tab at nopsema.gov.au.



Environment plan levies for title applicants

Amendments to Part 4D of the *Offshore Petroleum and Greenhouse Gas (Regulatory Levies) Act 2003* (the Levies Act) commenced on 18 July 2014. The changes imposed an environment plan (EP) levy on EP submissions received from applicants for specified Commonwealth titles.

Previously the Levies Act had imposed EP levies only on titleholders; however, amendments to the Levies Act extend this requirement to applicants for specified Commonwealth titles. EP levies will now be imposed if an EP is submitted under Regulation 9 of the Environment Regulations by an applicant for any of the following Commonwealth titles:

- a pipeline licence
- a petroleum special prospecting authority
- a petroleum access authority
- a greenhouse gas search authority
- a greenhouse gas special authority.

The Levies Act enables EP levies to be imposed for a new EP submitted by a titleholder, a proposed revision of an EP submitted by a titleholder, or a new EP submitted on or after 18 July 2014 by an applicant for any of the abovementioned titles.

The activity amount and the first compliance amount are due to NOPSEMA within 30 days of submission of an EP. The amount of EP levy payable by the applicant for the Commonwealth title is calculated in accordance with the Offshore Petroleum and Greenhouse Gas (Regulatory Levies) Regulations 2004.

For general information about EP levies see NOPSEMA's *Environment Plan Levy* guideline on the Cost Recovery and Levies page under the About tab at nopsema.gov.au. This guideline will be updated in the coming months to address the recent legislative amendments relevant to applicants.



Good personal safety doesn't necessarily mean good process safety

In order to measure safety performance operators need to identify and measure the appropriate indicators of safety performance. Suitably established performance indicators can be used to monitor safety-critical controls and provide assurance that offshore petroleum facilities are operating in a safe manner.

On 20 April 2010, the *Deepwater Horizon* mobile offshore drilling unit (MODU) suffered a blowout while performing drilling operations that led to the loss of 11 lives and the total loss of the MODU. In 2008, the operator of the *Deepwater Horizon* was awarded a 'Safety Award for Excellence' by the Minerals Management Service (MMS) and on the day of the blowout several "senior executives were on board to congratulate the crew on their outstanding safety and performance records" (United States Coast Guard, 2010).

This raises the question: How do regulators and operators measure safety performance when an operator can be recognised for excellent safety performance and soon after be involved in one of the worst offshore petroleum accidents in history?

There are two distinct types of safety within the offshore oil and gas industry: personal safety and process or MAE (major accident event) safety. The two types of safety are very different and as such their performance indicators are generally not the same.

Personal safety can be described as safety related to individuals and generally relates to incidents that do not have the potential to impact on more than one person for a single event. A failure in personal safety would include an injury or a fatality to an individual by way of, for example, a slip, trip, fall, or by electrocution. Process safety can be described in the offshore petroleum industry as safety that is related to facilities, systems and processes. Process or MAE safety relates to events that can impact on more than one person; a failure in process safety is often catastrophic with multiple injuries and fatalities.

The problem with measuring safety, and in particular process safety, is that you are measuring a non-event, as generally nothing has occurred. To measure the absence of danger there is a requirement, to an extent, to measure its presence.

Personal safety is commonly measured using Heinrich's (1931) injury relationship pyramid. Heinrich identified that for every major injury there are 29 minor injuries and 300 accidents with no injury. Major accident events (involving multiple injuries and/or fatalities) do

not occur frequently; they are high consequence very low probability events that require multiple technical and other controls to fail prior to injuries or fatalities occurring. Before the blowout on the *Deepwater Horizon*, the MODU had operated for 7 years without a single lost time injury. On this basis, it is clear that using Heinrich's injury triangle as an indicator for process safety by inserting an MAE event on top of the injury triangle is fundamentally flawed.

The Chemical Safety Board (CSB) investigation into the blowout identified that "systems used for measuring safety effectiveness in the offshore industry focused on personal safety and infrequent lagging indicators" (2012). Whilst personal safety is important, operators need to ensure that they are not focused solely on this type of safety. Overall safety performance cannot, and should not, be solely measured by personal safety performance indicators. Process or MAE safety and its performance indicators are equally important and should not be ignored.

Operators need to develop a relevant suite of performance indicators for measuring their process safety performance separate to that of their personal safety indicators. This can be achieved by measuring the performance of each barrier/control committed to in their safety case for each identified MAE.

For further guidance into process safety performance indication see the *Control measures and performance standards* guidance note (GN0271) on the Safety Case Guidance Page under Safety Case and the Safety tab at nopsema.gov.au.



Recent changes to the OPGGS Act

On 1 October 2014 specific amendments to the OPGGS Act came into force aiming to strengthen the operating practices of the Australian offshore petroleum industry and providing NOPSEMA with additional enforcement powers.

The changes make progress in implementing recommendations from the *Final Government Response to the Montara Commission of Inquiry* and include:

- the creation of a single class of ‘NOPSEMA Inspector’
- increased monitoring and investigation powers in environment inspections
- the introduction of alternate enforcement mechanisms including civil penalties
- mandatory publication of improvement and prohibition notices.

The creation of a single class of ‘NOPSEMA Inspector’ provides greater clarity and removes inconsistencies between the various powers of the former categories of inspector. This change brings a range of new monitoring and enforcement powers to environment inspections which are discussed in greater detail in the following article.

The introduction of new enforcement mechanisms will allow NOPSEMA to apply an appropriate and proportionate response to incidents of non-compliance. Criminal penalty levels have also been increased in line with other high hazard industries and NOPSEMA is now required to publish on its website all OHS and environment improvement and prohibition notices. Rather than serving a purely punitive function, these changes seek to promote best practice in the management of the risks of petroleum activities in Commonwealth waters.

For more information see the Recent Changes page under the Legislation & Regulations tab at nopsema.gov.au.

Environment inspections post 1 October 2014

Prior to the creation of a single class of ‘NOPSEMA Inspector’ environmental inspections were constrained in terms of the materials that could be used to monitor titleholder compliance. As of 1 October 2014 Petroleum Environmental Inspections will be undertaken by NOPSEMA inspectors with a suite of powers harmonised with the powers of the former class of OHS inspectors.

In the case of environmental inspections, similar powers and requirements in relation to entering premises, displaying identification and requiring reasonable assistance of titleholder representatives remain. To monitor titleholder compliance, NOPSEMA inspectors may also take photographs and video, conduct tests and ask questions of representatives; depending on the physical location of the inspection (i.e. onshore/offshore).

After an environmental inspection has been conducted, the OPGGS Act now provides for the provision of a Petroleum Environmental Inspection Report. The report will include the inspector’s conclusions and reasoning, along with any recommendations, and is issued to the titleholder. Titleholders will now be required to respond to recommendations within a timeframe determined by NOPSEMA to set out any proposed actions that will be taken in response. Inspection recommendations will feature as a consistent topic scope for future inspections to allow NOPSEMA to track recommendations to closure.

Additional offence provisions and enforcement options such as environmental improvement notices and environmental prohibition notices have also been introduced which are analogous with OHS provisions. For more information see Schedule 2A of the OPGGS Act as introduced by the *OPGGS Amendment (Compliance Measures) Act 2013*.

NOPSEMA’s *Planned petroleum environmental inspections* policy has recently been updated to reflect the changes above and include risk based targets for inspection frequency. The policy is available on the Inspections page under the Environmental Management tab at nopsema.gov.au.



New Diving Project Plan (DPP) Concordance Table

A new Diving Project Plan (DPP) Concordance Table has recently been developed and published on NOPSEMA's website to assist diving contractors seeking approval of DPPs and operators for diving projects in their review and approval of DPPs.

Diving contractors are encouraged to utilise the new DPP concordance table as it has been designed to help demonstrate which section(s) of the DPP address the regulatory content requirements of Regulation 4.16 of the Commonwealth Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2009 and/or Victorian regulatory equivalent.

Operators for diving projects are also encouraged to utilise the DPP concordance table, as part of their DPP review and approvals process under subregulation 4.12(3), as the table provides the operator with a 'road map' to which section(s) of the DPP address the regulatory requirements.

For more information see the DPP concordance table on the Diving Operations page under the Safety tab at nopsema.gov.au.

Clarifying environmental input in oil pollution response arrangements

The timely provision of quality environmental and scientific data and expert advice is critical to decision making and minimising environmental harm.

Quality data should underpin all tactical, operational, and strategic environmental impact assessments and management decisions. Timely access to up-to-date environmental and scientific data, and expert advice on its application, is used to:

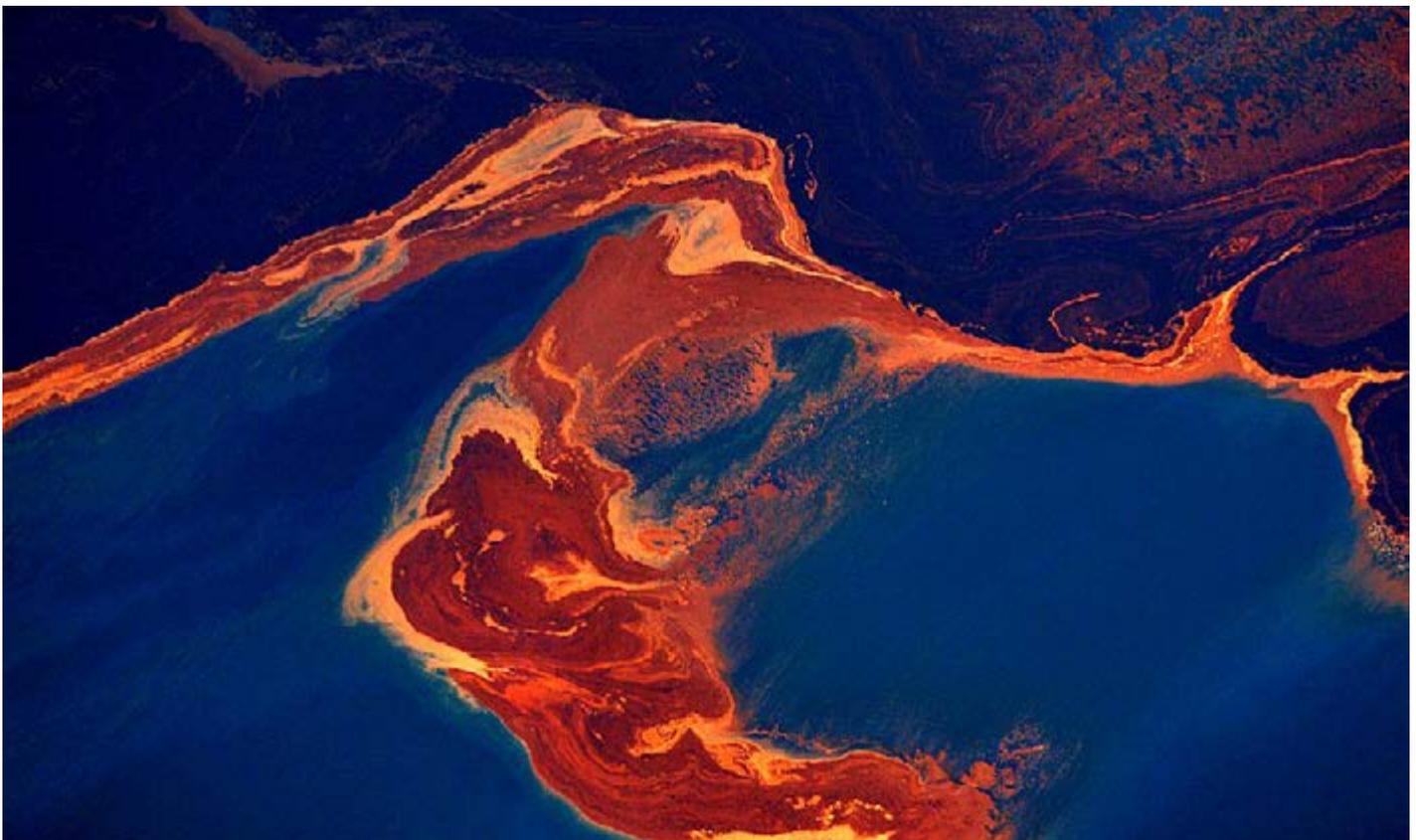
- validate and inform incident action planning
- target field/tactical deployments
- support operational decision-making
- apprise governments.

Titleholders are advised to have oil pollution response arrangements in place that facilitate the provision of expert environmental advice in the event of a spill. In many instances the titleholder is required to have their own capabilities and processes in place to ensure appropriate environmental advice is available to support oil spill response arrangements.

For response arrangements in state waters, the provision of environmental and scientific advice is usually coordinated on behalf of state agencies by a nominated state representative. This individual, the Environmental and Scientific Coordinator (ESC), has specific responsibilities and supporting processes, documented in the relevant state marine oil pollution plans.

While preparing EP submissions, titleholders must consider the legislative and administrative response arrangements of the jurisdiction where any response will be undertaken. Through consultation with the relevant state agencies, titleholders are encouraged to reflect state response arrangements in their EP submission.

For detailed information see the *Oil pollution risk management* information paper on the Environmental Resources page under the Environment tab at nopsema.gov.au. Titleholders may also wish to read the *New 'Oil pollution risk management' information paper* article on page 13.



Science in complex environmental decisions

It is commonly understood across the offshore petroleum industry that effective decision making in relation to environmental management should be based on sound scientific rationale.

This is particularly relevant in the context of objective-based regulation where the onus is placed on the titleholder to present a supported case that demonstrates environmental impacts and risks of petroleum activities are being managed to as low as reasonably practicable and acceptable levels. Likewise, the regulator must be proficient at considering the merit of the case provided, along with any outstanding disputes, in order to reach a reasoned, science-based decision.

A recent article, entitled *Applying scientific principles in international law on whaling*, by William de la Mare et al. (2014) has emphasised the importance of this concept. The article references a recent ruling by the International

Court of Justice that a Japanese whaling program in the Antarctic, ostensibly for scientific purposes, was not sufficiently research-oriented and thus was illegal. In the article, De la Mare et al. present the process applied by the court to reach this decision as a case study for making effective decisions in relation to complex technical disputes. The article cautions the misrepresentation of science to advance non-science agendas in disputes involving economic, social, or political values and urges decision makers to base decisions on scientific merit.

NOPSEMA upholds these principles in its role as the independent regulator for environmental management of offshore petroleum activities. This is achieved through impartially assessing environment plans in accordance with acceptance criteria designed to focus NOPSEMA's decision making on scientific merit. To facilitate this process titleholders are encouraged to transparently and accurately identify and evaluate impacts and risks in order to present a robust science-based case for acceptance.

For more detail on the concepts presented by De la Mare et al. please see the *Applying scientific principles in international law on whaling* article which is on the [Jack Baskin School of Engineering](#) website, alternatively [click here](#). Titleholders may also wish to review NOPSEMA's *Environment plan content requirements* guidance note on the Environment Plan page under the Environmental Management tab at nopsema.gov.au.



Image by bschwehn from www.freeimages.com

Fibre reinforced plastic (FRP) deck gratings

What happened?

During a recent facility inspection, a NOPSEMA inspector observed Fibre Reinforced Plastic (FRP) deck gratings were being used as a part of the designated emergency exit route across a facility. Upon further investigation, it was discovered a decision to replace the original steel grating with FRP grating had not considered the vulnerability of FRP grating to hydrocarbon fires. This was of concern given recent warnings about potential failures of fire resistant composite materials used offshore (see 'References' section below). Furthermore, it was apparent the operator had failed to consider all implications of changing materials and was informed of the need to reassess their decision to ensure that the risks associated with FRP were reduced to as low as reasonably practicable (ALARP).

What could go wrong?

FRP deck gratings have the potential to appear undamaged after being exposed to hydrocarbon fires and can catastrophically fail while under the load of an individual. For example, a worker who runs over the grating has the potential to fall and encounter serious injury.

Key lessons

- Operators should ensure that when proposing to make a change they take all reasonably practicable steps to source available safety information related to the change, and act on it where appropriate.
- FRP grating has been shown to be vulnerable to hydrocarbon fires and its use on an offshore facility needs to be assessed to ensure that risks associated with its use are ALARP.
- If facility operators use FRP grating they need to clearly define the performance required of the grating. For example the temperature and duration of fire that the FRP should resist and still subsequently support a minimum weight under dynamic conditions.
- The performance required of the FRP grating should then be compared against the performance described by suppliers to ensure that the FRP grating can meet its required performance.

Figure 1. FRP (left) and steel (right) gratings post dynamic testing.



The legislation

Clause 9 of Schedule 3 of the OPGGS Act requires that "the operator of a facility must take all reasonably practicable steps to ensure that the facility is safe and without risk to the health of any person at or near the facility." This includes an obligation to take all reasonable practicable steps to:

- implement and maintain appropriate procedures and equipment for the control of, and response to, emergencies at the facility [Clause 9(2)(e)]; and
- provide all members of the workforce with the information, training and supervision necessary for them to carry out their activities in a manner that does not adversely affect the safety of persons at the facility [Clause 9(2)(f)].

References

The following oil and gas publications provide further information on the issue of FRP deck grating vulnerability:

1. Health and Safety Executive. (2012). HID 2-2012 - Warning to offshore industry on possible failure of fire resistant composite deck gratings. Retrieved from <http://www.hse.gov.uk/safetybulletins/deck-gratings.htm?eban=govdel-offshore-bulletin&cr=02-Oct-2012#>
2. Health and Safety Executive. (2012). RR950 - Preliminary fire testing of composite offshore pedestrian gratings. Retrieved from <http://www.hse.gov.uk/research/rrhtm/rr950.htm>
3. Oil and Gas UK. 2013. Technical Note - Subject: Fire Resistance of Composite Grating. Retrieved from <http://www.oilandgasuk.co.uk/templates/asset-relay.cfm?frmAssetFileID=3194>

Contact

For further information email alerts@nopsema.gov.au and quote Alert 60. NOPSEMA safety alerts are published at nopsema.gov.au, on the 'Safety Alerts' page under the 'Safety' tab.



Notification of accidents and dangerous occurrences

In some circumstances an operator will identify an accident or dangerous occurrence sometime after the incident. Operators are reminded that, irrespective of when a notifiable incident is detected, they are required to notify NOPSEMA as soon as practicable.

Every month, NOPSEMA reviews an operator's deaths and injuries summary report and compares that report with the injuries recorded separately in its regulatory management system. If any discrepancies are detected, when required, the authority will contact the operator seeking clarification.

A recent review showed that a minor accident resulting in an injury was later escalated to a lost time incident (LTI). As the initial accident was not notifiable at the time of its occurrence, NOPSEMA was not contacted by the operator. When the operator escalated the accident to an LTI, however, it became a notifiable accident and as such NOPSEMA should have been notified.

Where an injury is later reclassified as an LTI, the operator should notify NOPSEMA as soon as practicable. The notification should be followed by the provision of a report.

For more information see NOPSEMA's *Notification and Reporting of Accidents and Dangerous Occurrences* guidance note on the Reporting Accidents and Dangerous Occurrences page under the Safety tab at www.nopsema.gov.au.

New 'Oil pollution risk management' information paper

NOPSEMA recently published a new information paper entitled *Oil pollution risk management* to address the February 2014 amendments to the Environment Regulations; specifically the change from Oil Spill Contingency Plan (OSCP) to Oil Pollution Emergency Plan (OPEP) and explicit requirements for monitoring environmental impacts in the event of an oil spill.

The aim of the paper is to provide titleholders with specific information about the type of content and level of detail required for an OPEP and to provide clarification around considerations that support the development of an acceptable environment plan submission in relation to oil pollution risks.

To appropriately inform the development of the paper, NOPSEMA consulted with industry via a reference group that included representatives from all major industry associations. The feedback from the reference group was extremely valuable.

The paper supersedes the *Oil spill contingency plan* guidance note and builds on the information provided in the *Environment plan content requirements* guidance note. The information paper should be read in conjunction with the guidance note.

To read the *Oil pollution risk management* information paper and *Environment plan content requirements* guidance note please see the Environmental Resources page under the Environment tab at nopsema.gov.au.





Data reports and statistics

NOPSEMA continuously collects and receives data on the safety, well integrity and environmental management performance of the offshore petroleum industry, as well as its own regulatory performance. This data is regularly analysed and converted into a series of datasets. The latest datasets are published both quarterly and annually under the 'Resources' tab at nopsema.gov.au. They contain many familiar performance indicators such as incident rates, injury rates, hydrocarbon releases and international benchmarks.



Schedule of events

Events listed below are those at which NOPSEMA is presenting or exhibiting or has an organisational role.

- 13 November 2014 Financial assurance information session for titleholders, Perth
- 18 November 2014 Financial assurance information session for titleholders, Melbourne

To register for the information sessions [click here](#) or see the NOPSEMA Events page under the Resources tab at nopsema.gov.au. *Due to limited capacity attendance at the information sessions will be restricted to two representatives per titleholder company and one representative for other interested industry participants.*

- 18-19 November 2014 International Offshore Petroleum Environmental Regulators Annual General Meeting, Mexico
- 2-3 December 2014 Offshore support vessels conference, Perth
- 17-20 May 2015 APPEA conference and exhibition, Melbourne

Feedback

NOPSEMA welcomes your comments and suggestions. Please direct media enquiries, requests for publications, and enquiries about NOPSEMA events to communications@nopsema.gov.au. Operators and other employers are encouraged to circulate this newsletter to their workforce. Past issues of this newsletter are available at nopsema.gov.au

Subscribe

NOPSEMA has recently expanded its online subscription service. To receive the latest news and developments from Australia's national regulator for the oil and gas industry please complete the online [subscription form](#). NOPSEMA's services include news and information on environmental management, HSRs, media releases, safety alerts and *the Regulator* newsletter.

The information provided in this publication is intended to provide general information and guidance only and should not be treated as a substitute for professional advice. Please read NOPSEMA's [disclaimer](#).

Contact details

Perth Office
Level 8
58 Mounts Bay Road Perth
Western Australia

p: +61 (0) 8 6188 8700
f: +61 (0) 8 6188 8737

GPO Box 2568
Perth WA 6001