

From the CEO

Welcome to the first issue of *the Regulator* for 2016. I think it's constructive to start our first issue for the year by reflecting on the achievements of the previous year.

In 2015, NOPSEMA received 102 safety cases, 30 well operations management plans and 44 environment plans submissions for assessment. We also conducted 195 inspections, the highest number since our establishment in 2012. While the implications from declining industry activity are yet to be fully realised, there remains a substantial core body of regulatory effort required to maintain an effective oversight of the offshore oil and gas industry. One result I was particularly pleased to see is a reduction in the number of uncontrolled hydrocarbon releases during the second half of 2015. NOPSEMA will be working closely with the industry to continue this trend in 2016 as pricing pressures persist.

I believe the regulatory regime administered by NOPSEMA is the best way to achieve strong safety and environmental outcomes. I am proud of NOPSEMA's independent, merit-based approach to decision-making. Independent reviews of NOPSEMA have found it to be a robust, rigorous and competent regulator; this includes two independent reviews conducted in 2015. NOPSEMA's establishment in 2012 saw a 'rising of the bar' for environmental management with a far more rigorous application of the regulations than the previous arrangements industry had become accustomed to.

The bar was lifted to meet community expectations in 2012 and in the following years NOPSEMA and industry went on a journey implementing and adjusting to the regime. Community expectations have continued to evolve and in response we have seen industry lift performance, with better mitigation strategies in place and improved consultation. NOPSEMA has reflected these developments by also improving consultation. In 2015, the regulator conducted 472 meetings with duty holders and 241 meetings with government, non-government and industry stakeholders including unions, environmental NGOs, and fishing groups.

In 2015, NOPSEMA conducted a survey on community and industry attitudes toward consultation and found a 30 point gap between public and industry satisfaction. It is clear that there remains a 'disconnect' between the expectations of the community and industry, which is now fostering an ever stronger interest in industry activity and is reflected in increasing political scrutiny. While we might understand the difference and strength of the regulatory regime, many stakeholders do not. For example, the community sometimes equates a lack of conditions attached to approvals with a lack of oversight when it comes to approval. Collectively, we haven't contributed enough to shaping community expectations and their understanding of the regulatory regime.

NOPSEMA has sought to improve community confidence in the offshore petroleum environmental approval process by implementing a stakeholder engagement and transparency work program. On 1 January 2016, NOPSEMA commenced publishing information on the status of environmental assessment, expected decision dates and any decisions made. We have also implemented proactive online notifications and amended guidance requiring published summaries for accepted environment plans to include the full report of consultation. This amendment provides stakeholders with greater transparency around the consultation undertaken and the results of that consultation.

Everyone is under pressure and the community is watching. How the industry responds to the challenges to come will determine the future regulatory model and whether the industry is accepted as part of the community.



Stuart Smith, CEO



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Critical maintenance for idle rigs

Current industry conditions have led to a situation where mobile offshore drilling units (MODUs) are sitting idle for long periods of time — a situation not seen for some years.

In some cases, rigs are being ‘cold stacked’; workers are transferred or released, the hatches are battened down and the rig is completely shut down. Other operators may choose to ‘ready stack’ or ‘warm stack’ their rigs such that although the rig is idle it is still operational. A ready stacked rig typically retains most of its maintenance crew and can deploy quickly if a client requires its services. In a ready stacked state, normal maintenance operations similar to those performed when the rig is active are continued by the crew so that the rig remains work ready. In either case, stacking a rig involves ‘storing’ the rig in a harbour, shipyard or designated holding area offshore. These MODUs are not within NOPSEMA’s jurisdiction and the authority does not have any regulatory role in operators’ management of the maintenance of idle MODUs.

Whether the operator suspends all maintenance while the rig is idle or has a modified maintenance plan is at its own discretion. When a MODU does return to NOPSEMA’s jurisdiction there are two principal issues of interest in this context:

1. Is the equipment fit for purpose and assuredly so?
2. Do the records in the maintenance system reflect (a) refurbishments or replacements that have taken place, and (b) do forward-looking records accurately reflect the required maintenance regime?

Two different approaches to these issues came to light during recent NOPSEMA inspections where two rigs had been idle for a lengthy period prior to starting work.

In the first instance, the computerised maintenance management system (CMMS) was kept operational although it was not being utilised. Much of the rig equipment had been stripped down and refurbished and in some cases replaced. When it came time for the rig to return to operations, the CMMS had a large backlog that had to be reviewed by the maintenance crew to ascertain if it was still applicable in light of the refurbishment and change-out of equipment. This approach added to the workload of the maintenance crew but was essential to ensure that no critical maintenance was missed.

In the second instance, the CMMS was shut down. When the system was subsequently reactivated it automatically started scheduling maintenance from the reactivation date. The system had been shut down in 2014 and reactivated in 2015. In the most extreme cases critical annual maintenance routines which were last conducted in 2013 were rescheduled for 2016. Some of these gaps were picked up by the experienced rig crew and others were picked up by virtue of a company requirement to have third party certification as evidence of maintenance. However, there was no assurance that all gaps were identified. This situation clearly represents a deficiency in the operators’ ability to demonstrate maintenance of critical control measures.

NOPSEMA recognises the fundamental importance of maintenance and maintenance management and it is one of the focus topics for inspection in the NOPSEMA’s annual operating plan for 2015-16. When a facility returns to NOPSEMA’s jurisdiction, NOPSEMA will examine how the operator has ensured the integrity of critical control measures to maintain the risk to offshore workforce to as low as reasonably practical.





Stakeholder engagement and transparency improvements pay off

Since August 2015, NOPSEMA has been implementing a work program approach to improve environmental consultation processes and build community confidence in offshore petroleum environmental management. Stakeholders have been heavily engaged in providing feedback on proposed solutions to improve NOPSEMA's administration of environmental management legislation, as well as industry's performance in this area.

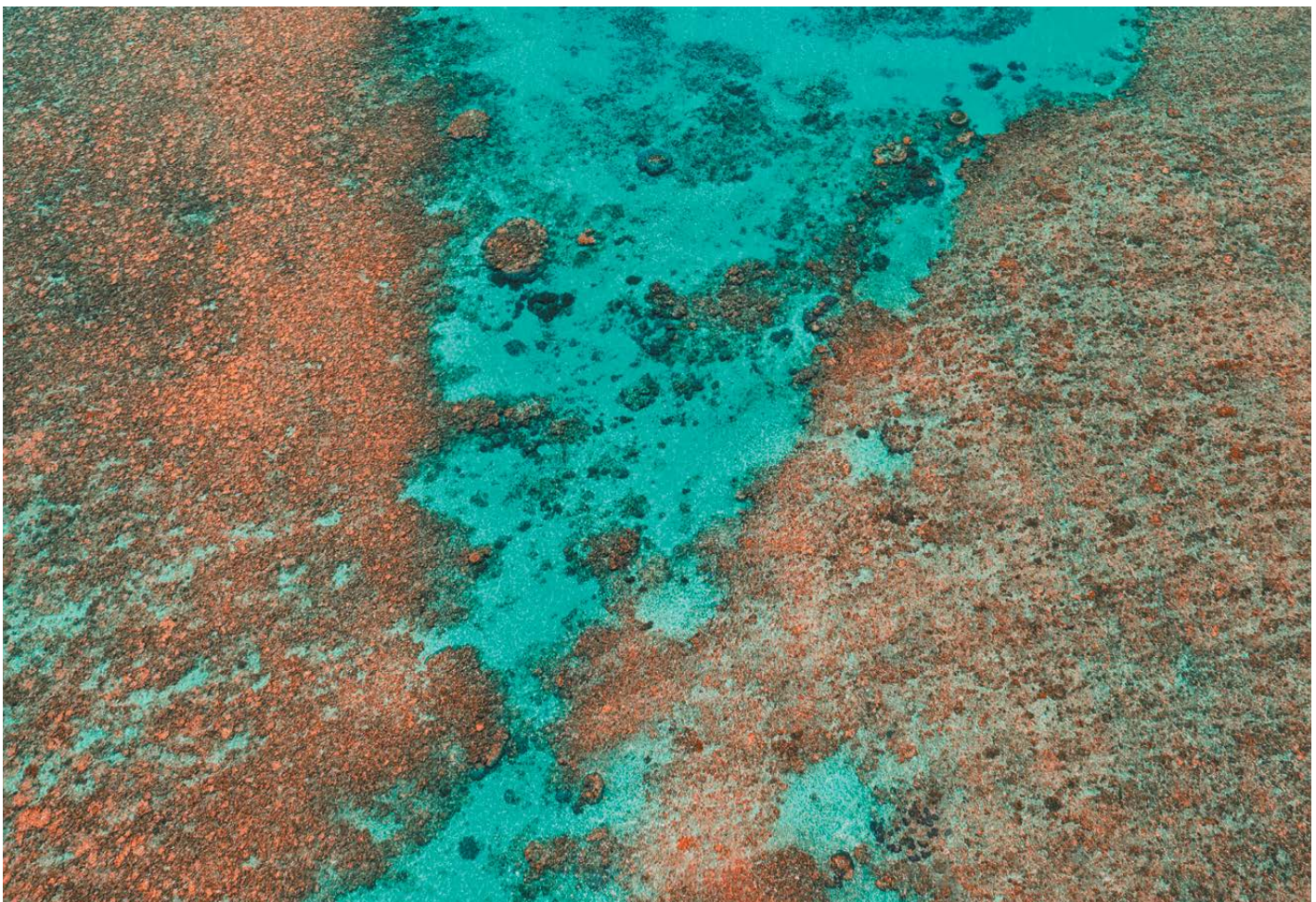
On 1 January 2016, following an analysis of stakeholder feedback, NOPSEMA introduced a number of changes as part of the work program, including:

- publication of NOPSEMA decision notifications made in relation to environment plans
- publication of up-to-date information regarding the status of assessments and petroleum activities
- guidelines that now require published summaries of accepted environment plans to include the full report of consultation from the environment plan.

These changes provide greater transparency on the consultation process carried out by titleholders, improve accountability, and ensure an effective consultation process is undertaken.

Initial feedback indicates the changes to date have been well received. NOPSEMA will continue to engage with key stakeholders throughout 2016 to continue to improve consultation outcomes and enhance transparency. Several initiatives are aimed at making processes more effective and importantly less burdensome for stakeholders, industry and NOPSEMA.

Interested parties are encouraged to keep up to date by [subscribing](#) to receive updates or viewing the [Status summary report](#) on the NOPSEMA Environment [work program](#) website.





Sharing lessons learned through environment alerts

NOPSEMA's approach to compliance employs a broad range of activities, including extensive use of promotion and advice. With the overall objective of improving environmental outcomes and proactively encouraging compliance, NOPSEMA has commenced publishing environment alerts.

The purpose of an environment alert is to highlight a particular environmental issue that may have broad relevance across industry. These alerts provide a means to more broadly communicate lessons learned and ensure that what could or has gone wrong, and how to prevent it from happening, can be understood by titleholders in similar circumstances. Alerts will be issued to subscribers and published on NOPSEMA's website as they are identified through NOPSEMA's assessment, inspection and investigation activities. Titleholders are encouraged to consider the learnings from published alerts when reviewing their systems for ensuring ongoing compliance to prevent the same issues being repeated for their petroleum activities. NOPSEMA's first environment alert entitled 'Proper application of change management processes' is published on page 12 of this Regulator issue.

Sign up to [NOPSEMA's environment alerts subscription channel](#) to receive email notifications of published alerts.

Human factors in accident investigations

Human performance difficulties (HPDs) are regularly identified by operators as root causes for accidents and dangerous occurrences reported to NOPSEMA. HPDs have been identified as a root cause in 50% of all notified reportable occupational health and safety incidents, proportionally 80% of all incidents resulted in serious injury, and 76% where death or serious injury could have occurred.

The consistent pattern of HPD root causes suggests that corrective actions may not be appropriately targeted and so may be ineffective in preventing future accidents and dangerous occurrences. Popular root cause analysis tools may not offer a sufficiently deep analysis of human factors issues, contributing to the development of ineffective corrective actions. The development of effective and appropriately targeted control measures requires a sound understanding of the causal factors contributing to an event, including the human factors.

NOPSEMA has recently published a '[Human factors in accident investigations](#)' information paper (IP1598) to facilitate improvement in the quality of human factors analysis during accident investigations, and so contribute to the development of more effective corrective actions, and more robust control measures. The information paper provides a suggested approach to exploring human factors contributions within accident and dangerous occurrence investigations.



Courtesy of Exxon Mobil Australia.



Feedback sought on oil pollution risk management guidance

NOPSEMA is currently seeking feedback on its [Oil pollution risk management information paper](#) (IP1488). Feedback will be used to identify how we may further assist titleholder understanding of the requirements of the Environment Regulations in relation to evaluating environmental impacts and risks of oil pollution, and the content and level of detail required in an oil pollution emergency plan.

While developing the information paper, which was published in early 2014, NOPSEMA sought feedback from relevant industry stakeholders. The feedback NOPSEMA received was extremely valuable and helped focus the information paper on key considerations for a titleholder to prepare an acceptable environment plan and oil pollution emergency plan submission.

To ensure the information paper continues to meet its purpose, NOPSEMA is again seeking feedback from titleholders on any areas for improvement or requiring further clarification. NOPSEMA is currently conducting a targeted questionnaire of titleholders, however, participation by all titleholders is encouraged and welcomed.

If you are interested in participating in the questionnaire, would like to provide feedback, or are seeking more information please email communications@nopsema.gov.au.

Changes to NOPSEMA reporting of recordable incident data

After analysing four years of environmental incident history, NOPSEMA has decided to increase focus on publishing amalgamated data on environmental reportable incidents and cease publication of recordable incident statistics. This is due to inherent variability in the nature of recordable incidents and the fact that they are associated with occurrences with low or no environmental damage. The variability compromises meaningful industry-wide trend analysis and the standalone publication of these statistics risks misrepresentation.

Recordable incidents specific to individual titleholders remain useful in managing petroleum activities and for NOPSEMA as a regulator. Titleholders should use their recordable incident data to analyse and manage non-conformances and identify areas for improvements in prevention of unacceptable impacts and risks to the environment. NOPSEMA considers this information in the selection of petroleum activities for inspection and the scope of inspections relating to titleholder systems for reporting, managing and addressing non-conformances. As such, NOPSEMA expects titleholders to continue to report recordable incidents.

NOPSEMA will continue to publish information about reportable incident and other compliance statistics in its online quarterly reports and annual offshore performance report. NOPSEMA has a project underway through the International Offshore Petroleum Environment Regulators forum to develop key reporting parameters across the oil and gas industry globally.



Investigating failures of riser emergency shutdown valves

Riser emergency shut down valves (RESRVs) are safety-critical components at the extremities of hydrocarbon pipelines. Should there be a loss of containment from hydrocarbon pipework on the facility, RESRVs are designed to close to prevent the contents of interconnecting pipelines from feeding any fire or developing a gas cloud that could lead to an explosion at the facility.

In Issue 3 (2015) of *the Regulator*, NOPSEMA published an Emergency shut-down and blow-down valve integrity management article highlighting deficiencies in the implementation of functional assurance plans for emergency shut-down and blowdown systems and failures to meet relevant performance standards. The UK regulator, the Health and Safety Executive (HSE), recently published a research report entitled Investigations into the immediate and underlying causes of failures of offshore riser emergency shutdown valves (RR1072) providing further information for consideration by Australian operators.

The HSE's report provides an analysis of information collected from an operator survey on 179 reported failures of RESRVs in the past seven years from the UK Continental Shelf (UKCS). Operators frequently state that the probability of failure of RESRVs is 1 in 1000 or lower. Given there are less than 500 RESRVs in the UKCS, there may be a mismatch between expected and actual performance. This article explores this mismatch and what Australian operators can do to ensure RESRVs are fully functional when required in an emergency.

The failure of RESRVs can be identified from inspection, maintenance and testing or from actual demand while in service. Operators are reminded that the failure of RESRVs is considered damage to safety-critical equipment. Under Clause 82 of Schedule 3 to the Offshore Petroleum and Greenhouse Gas Storage Act 2006, and in accordance with NOPSEMA guidance, operators are required to notify and report damage to safety-critical equipment to NOPSEMA.

The HSE's report identified the age of the RESRVs that failed and the failure to learn and implement lessons from previous incidents as prevailing themes. Operators indicated corrosion, the age of the RESRV and seizure/sticking as the three most common immediate causes for failure. Nearly half of all failed RESRVs had previously failed, and over a quarter of failed RESRVs were brought back into service after cycling and/or lubricating the valves. The report concludes operators need to perform a root cause analysis and identify improvements in inspection, testing and maintenance regimes rather than simply fixing the RESRV and returning it to service.

The inspection, testing and maintenance regime for a new RESRV is likely to be different from that required for a 25 year old RESRV. Obtaining vendor guidance on inspection, maintenance and service life for the individual components from different manufacturers that comprise an RESRV installed over a quarter of a century ago is likely to be a challenging task for operators. As such, operators need to put considerable thought into their inspection, testing and maintenance regimes.

Lessons learned from previous RESRV failures from Australia and the UK indicate that ageing equipment will suffer from:

- Degradation of polymeric materials, such as valve seals, shuttle valve o-rings and housing weather seals. Deteriorated o-rings result in degradation of shuttle valve performance and eventual seizure, and deteriorated weather seals will lead to water ingress and accelerated corrosion product build up within the actuator, reducing operability.
- Corrosion of metallic components, such as actuator housings and internal components, return springs, vent port valves and plugs, spring canisters, retention grooves and circlips and tie rods. Corroded return springs become weaker over time and have been known to collapse completely. Such a failure leaves the RESRV in a 'failed open' state, and will remain undetected until the next attempt to operate. Corroded spring canisters and tie rods have led to energetic spring ejection, with potential for serious escalation should small bore process pipework be damaged or serious injury to personnel in the vicinity of the projectile.
- Degradation of grease and lubricants leading to seizure or increased friction with insufficient actuator motive force to close the valve in a timely fashion, or complete seizure resulting in the valve failing to danger.
- Leaks of product, hydraulic fluid or process air

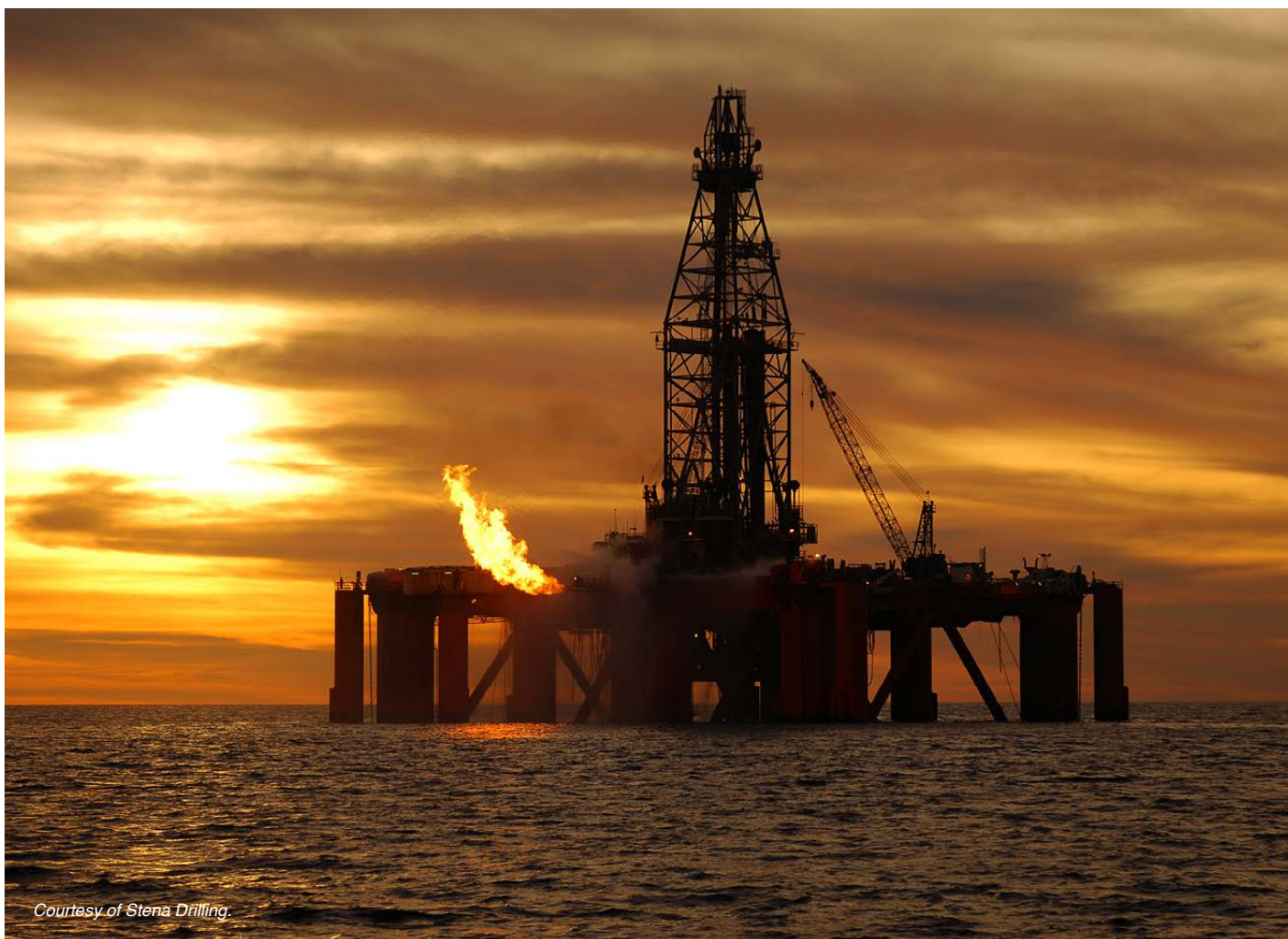


- Contamination of process air or hydraulic fluid leading to internal corrosion of actuator pipework or pistons.
- Corrosion of solenoid contact surfaces, causing them to stick, resulting in undetected fail to danger.

To reduce the number of RESDV failures, operators should ensure that:

- Inspection, testing and maintenance regimes are employed with due consideration of anticipated valve and actuator failure modes, appropriate to the age and condition of the RESDVs. This should include consideration of whether periodic replacement of components or partial/full strip down maintenance is required. This might require the components to be removed from service and brought ashore to manufacturer or workshop facilities for refurbishment. Failure Modes, Effects and Criticality Analysis (FMECA) may be an appropriate methodology to enable identification of the causes of component failure and development of appropriate mitigations for RESDVs.
- Root cause analysis of previous failures is performed and findings are used to enhance inspection, testing and maintenance regimes. Application of the FMECA methodology may also be of benefit in failure investigations.
- Trending and analysis of RESDV performance data to anticipate failures, recording measurable quantities such as closure time and internal leakage rate rather than just pass or fail. There should be recognition that some failure modes (such as solenoid sticking) may lead to undetectable instantaneous fail to danger rather than gradual deterioration.

In accordance with Clause 9(2)(e) of Schedule 3 to the OPGGS Act, NOPSEMA reminds operators to take all reasonably practicable steps to implement and maintain appropriate procedures and equipment for the control of and response to emergencies at the facility. The successful closure of an RESDV in an emergency depends on the operation of an interlinked series of components all of which must function effectively. Operators should review the adequacy of their RESDV inspection, testing and maintenance regimes with the above issues in mind and draw on available industry guidance such as that within BSI Standards Publication PD 8010:5-2013 Subsea Pipelines – Guide to Operational Practice.





NOPSEMA to participate in oil spill preparedness and response events

NOPSEMA will soon participate in Australia's premier event for those working in and around oil spill prevention, preparedness, and response. Spillcon will be held in Perth, Western Australia, from 2-6 May and boasts an exceptional line-up of international and Australian speakers.

At the conference, NOPSEMA's Head of Division for Environment, Cameron Grebe, will deliver a presentation entitled 'From assurance to inspection – Regulating offshore petroleum incident response'. Michael O'Brien, an Environment Specialist in NOPSEMA's Spill Risk Team will discuss 'How much is enough? Regulating offshore oil spill preparedness and response'. NOPSEMA will also have an exhibition booth with specialists available for discussion on all related matters.

NOPSEMA is also co-sponsoring a special pre-conference workshop for industry and regulators on the oil spill preparedness topic of 'How Much is Enough?' This half-day workshop is a joint initiative between the International Offshore Petroleum Environment Regulators (IOPER), of which NOPSEMA is a member, and the Australian Petroleum Production and Exploration Association (APPEA). Industry and government stakeholders working in oil spill preparedness and response are encouraged to attend the workshop. The workshop is expected to discuss national and international perspectives on how much preparedness and response is appropriate in the context of offshore oil and gas activity. The workshop follows and will build on the work undertaken by IOPER members to develop a number of internationally-recognised 'guiding principles' for regulating oil spill response preparedness in the offshore oil and gas industry.

To register for the 'How Much is Enough?' workshop, just send a brief email to appeamail@appea.com.au with the subject line: Expression of Interest, APPEA OSR Forum – IOPER Joint Workshop, 2nd May 2016. For more information on IOPER itself and the guiding principles, see iooper.org. For more information on the Spillcon conference or to register, see spillcon.com.



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The importance of a nominated liaison person

For every petroleum activity, the Environment Regulations require the titleholder to nominate and provide the contact details of a liaison person and for NOPSEMA to publish this information on its website. The primary purpose of this is to facilitate communication between stakeholders and the titleholder after submission and throughout the life of the activity.

Consultation with stakeholders throughout the life of a petroleum activity is just as important to responsible environmental management as it is during development of an environment plan. By providing a point of contact to NOPSEMA, stakeholders know how they can raise concerns or queries with the titleholder directly and in a timely manner. This also provides a mechanism for titleholders to become aware of changes, particularly to the social, economic and cultural features of the environment that may affect the basis of the impact or risk assessment for the petroleum activity.

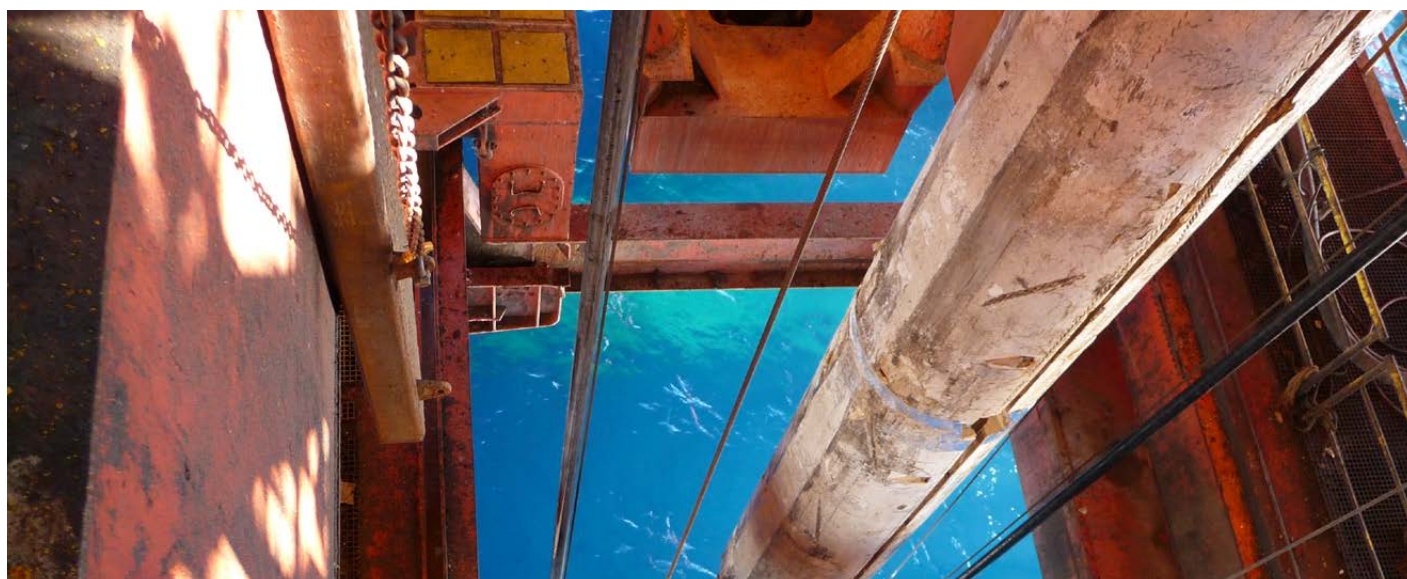
The [EP Content Requirements guidance note \(GN1344\)](#) on NOPSEMA's website provides further information on the purpose and requirements of a nominated liaison person.

NOPSEMA to trial online environmental management submissions

The Australian Government encourages agencies to improve user interfaces through the use of digital technology. The goal is to make systems easier to access, simpler to use and faster to transact. In 2014, regulatory changes allowed NOPSEMA to stop receiving hard copy documents for key submissions. This has made it easier to submit documents to NOPSEMA and has also reduced the quantity of paper documents within the organisation.

The next step in this digital transition is to implement dynamic, online submission forms. These digital forms eliminate the need for input of redundant or repetitive information and will guide people through the submission process. User-testing indicates substantial timesaving for titleholders and NOPSEMA. The online forms will be trialled initially for environment plan and financial assurance submissions. This new service will be available as a trial, commencing in the next month. The current forms and submission process will remain available in the immediate term.

NOPSEMA encourages titleholders to take advantage of the new service and welcomes feedback in order for NOPSEMA to evaluate the value in retaining and expanding this service and the demand for its application to other submissions and notifications made to NOPSEMA.





TEMPSC assurance

NOPSEMA has published a new guideline for operators outlining the regulator's expectations relating to the inspection, maintenance and testing of TEMPSC (Totally Enclosed Motor Propelled Survival Craft) on all facility types. The guideline describes the types of evidence NOPSEMA inspectors look for when verifying that operators are maintaining TEMPSC in a fit for purpose condition at all times.

The [Assurance of TEMPSC guideline \(GL1643\)](#) can be found on the Guidance page under Safety Resources at nopsema.gov.au.

Hand-arm vibration prevention

During a recent planned inspection at an offshore facility, NOPSEMA inspectors identified the potential for harmful exposure of the workforce to hand-arm vibration.

The use of portable vibrating mechanical equipment without appropriate controls can result in serious health effects that can lead to permanent, progressive and irreversible vibration-induced white finger, carpal tunnel syndrome, musculoskeletal disorders, and/or neurological disorders.

In this instance the inspectors found that:

- a) There was no evidence to demonstrate that a health risk assessment for vibration hazards had been performed for personnel who use portable equipment (e.g. deck scalers, buffers, grinders and needle guns).
- b) There was no evidence to demonstrate that any information or training was provided to the workers on the risks of mechanical vibration and the associated controls.
- c) All reasonably practicable steps had not been taken to ensure the use of portable vibrating mechanical equipment, for deck surface preparation, is carried out in a manner that is safe and without risk to the health of employees at the facility.

Consequently, the operator of the facility was required to take action; subsequently implementing a series of controls to address the hand-arm vibration risks associated with the use of portable vibrating mechanical equipment:

- A vibration survey was performed, where equipment and high risk groups were identified
- Low vibration needle guns were purchased
- Work instructions were updated to include handle rotations
- Procedures were introduced to ensure that needle guns are not operated longer than 30minutes and that crew shall have one (1) hour break before returning to operating the needle guns
- Extension arms were purchased to be fitted and used when using the deck scaler, where possible
- Training on vibration control was provided to relevant members of the workforce
- Vibration Control Plan was updated
- Inclusion of voluntary Vibration Health Surveillance.
- Anti-vibration gloves, knee pads and kneeling mats were purchased for use

SafeWork Australia has published guidance material about the risks posed by hand-arm vibration and control measures at [SafeWork Australia](#).



Environment alert: Proper application of change management processes

What happened?

Recent inspections conducted by NOPSEMA have raised concerns regarding the proper application of the management of change (MoC) control measure. This has resulted in seven recommendations and one Improvement Notice over the past six months.

The following is a summary of the deficiencies identified:

- Failure to submit a proposed revision of an environment plan for a new stage of an activity (extending a seismic survey from 30 days to 55 days).
- Failure to implement a management of change process before a new stage of the activity commenced.
- Inadequate justification for altering or removing an environmental performance standard in the accepted environment plan.
- Failure to properly consider a series of increases, or a series of new environmental impacts and risks arising from changes to the activity made over time.
- Failure to report a breach of an environmental performance standard after realising that the standard does not, or cannot, monitor the level of performance set in the environment plan.
- Increased the volumes and frequencies of planned discharges of production fluids beyond the scope of the activity described in the accepted environment plan.
- Changes to the wording of environmental performance standards in a way that materially degrades or diminishes the level of performance set for control measures that manage environmental impacts and risks.

In most cases, NOPSEMA inspectors found that titleholders manage change through partial or simplistic environmental assessments that are different to the assessments completed for the submission of the environment plan. Critically, MoC procedures do not consider the change in the context of the demonstration of impacts and risks to levels that are acceptable and as low as reasonably practicable (ALARP) in the environment plan in force. Furthermore, they do not consider changes that may alter the basis upon which the environment plan was accepted.

NOPSEMA inspectors have found a wide variety of the application of Regulation 17 resulting in failure to distinguish between revision triggers of Regulation 17(5) and Regulation 17(6). This is particularly prevalent for the requirement to have a revised environment plan accepted prior to commencing a significantly modified, or a new stage of an activity.

What could go wrong?

NOPSEMA is particularly concerned about inadequate or poorly applied MoC procedures which fail to continually identify and reduce environmental impacts and risks to levels that are acceptable and ALARP. As a result, a titleholder may fail to meet the agreed level of protection afforded to the environment resulting in significant threat to the environment. For example:

- diminishing the timeframes for implementation of control measures necessary for the timely control of a major oil spill that may expose sensitive habitats to pollution
- exposing sensitive environments to levels of sound that may cause lethal or sub-lethal effects
- emitting or discharging harmful substances in excess of permitted quantities which significantly affect sensitive and important marine habitats
- interference or disturbance to other marine users
- being unaware of, or unable to adapt to, dynamic environmental circumstances leading to increased threat to the environment.



Key lessons

- All users of the environment plan need to be aware that the activity description provided in the accepted environment plan is the basis on which NOPSEMA accepted the document.
- The activity description provided in the submission must clearly identify the boundaries and limitations that define the scope of the activity, including the stages of the activity.
- Titleholders should implement the rigorous methods of environmental assessment applied in the accepted environment plan when implementing MoC processes.
- Titleholders should have comprehensive records of their consideration of Regulation 17 for each change.
- Titleholders should demonstrate continuous reduction of impacts and risks to ALARP and acceptable levels by appropriately applying MoC processes to incremental improvements.
- NOPSEMA expects that, where possible, titleholders implement MoC processes prior to a change occurring to allow for exploration of alternative management options.

The legislation

Regulation 17 states that a titleholder must not undertake an activity in a way that is contrary to the environment plan in force for the activity.

Regulation 17(5) requires that a titleholder must submit a proposed revision of the environment plan before the commencement of any significant modification or new stage of the activity that is not provided for in the environment plan currently in force.

Regulation 17(6) requires that a titleholder must submit a proposed revision of the environment plan for an activity before, or as soon as practicable after:

- a) The occurrence of any significant new environmental impact or risk, or significant increase in an existing environmental impact or risk, not provided for in the environment plan in force for the activity; or
- b) The occurrence of a series of new environmental impacts of risks, or a series of increases in existing environmental impacts of risks, which, taken together, amount of the occurrence of:
 - i. A significant new environmental impact or risk; or
 - ii. A significant increase in an existing environmental impact or risk;that is not provided for in the environment plan in force for the activity.

References

[NOPSEMA Environment Plan Assessment Policy – Section 6](#)

Contact

For further information email alerts@nopsema.gov.au and quote Environment Alert 1. NOPSEMA environment alerts are published at nopsema.gov.au, on the 'Environment Alerts' page under the 'Environment' tab.

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.

- 22-25 March Offshore Technology Conference Asia 2016, Kuala Lumpur
- 11-15 April 18th International Conference and Exhibition on Liquefied Natural Gas (LNG 18), Perth
- 2-6 May Asia-Pacific Oil Spill Prevention and Preparedness Conference (Spillcon) 2016, Perth
- 5-8 June 2016 APPEA Conference and Exhibition, Brisbane



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, well integrity, 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](#).

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