

^{the} REGULATOR

Issue 2: 2012



From the CEO

Welcome to the second issue of *the Regulator* for 2012. I am particularly pleased to see that the number of subscribers to this newsletter keeps growing. We aim to produce articles that are relevant and informative to industry and government stakeholders, and value your feedback.

NOPSEMA's schedule of events.

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"The organizational causes of this disaster are deeply rooted in the histories and cultures of the offshore oil and gas industry and the governance provided by the associated public regulatory agencies. While this particular disaster involves a particular group of organizations, the roots of the disaster transcend this group of organizations. This disaster involves an international industry and its governance."

Final Report on the Investigation of the Macondo Well Blowout, Deepwater Horizon Study Group, 1 March 2011. 2012 continues to present challenges and opportunities for both NOPSEMA and the offshore petroleum industry. The Authority is committed to engaging with industry as it navigates the responsibilities required of it by a national objectives-based regulatory regime. Already, stakeholders are providing constructive feedback to the first of our environment plan workshops and introductory seminars. There will be many more opportunities to exchange views and experiences in the coming months. I encourage you to visit www.nopsema.gov.au to view presentations and

In looking to the future, however, I also note that this issue of *the Regulator* marks two years since the Macondo well blowout disaster in the Mexican Gulf on 20 April 2010, which claimed 11 lives and wreaked havoc on the environment and coastal communities. The passing of this sombre anniversary and recent well integrity incidents in the North Sea and Brazilian waters, are stark reminders of the potential hazards that offshore petroleum activities continue to pose to lives and livelihoods. In the case of Macondo, the costs are still being counted.

Australia's own experience of the Montara blowout in 2009 spurred the formation of NOPSEMA as Australia's national regulator for offshore safety, well integrity and environmental management. NOPSEMA is itself working to meet the Federal Government's – and wider community's – expectations for best practice regulatory administration (the Commonwealth <u>Statement of Expectations</u> can be viewed on the NOPSEMA website). We have continued to examine our operations and structures in light of the additional responsibilities. In terms of structure, we have recently reinforced our senior management team and now have three regulatory teams: one focused on safety and integrity, one focused on environmental management and one focused on investigation, regulatory management and improvement. NOPSEMA's organisational structure and processes will continue to evolve to ensure the Authority's competency, technical proficiency and resources fulfil its regulatory responsibilities.

Likewise, the offshore petroleum industry must take responsibility for continuing to examine whether risks to human health and safety and environmental risks and impacts are as low as reasonably practicable. Challenging systems and sharing information, including lessons learned, are key to driving positive change and continuous improvement. Industry can and should embrace the opportunity to 'do better' and deliver long term rewards rather than costly legacies.

Jane Cutler, CEO





We all encounter human error in our daily lives – locking the keys in the car, flicking the wrong light switch, walking into a room and wondering why we are there, even finding the mobile phone in the freezer! Of course, these are relatively low-risk errors; they pose more of a nuisance than a serious safety concern. However, these human errors can manifest in more hazardous ways while we are at work.

Most of us are familiar with the statistic that 90% of incidents are caused by so-called "human error". It seems logical, therefore, for us to blame incidents on individuals or small groups of people and to focus our remedial actions at the individual level, e.g. training, disciplinary action, etc. However, by taking this approach in addressing human error, we ignore the latent conditions in our work systems that trigger human error across our workforce. Rather, human error should be recognised as an outcome of combined factors, instead of the root cause of an incident. Organisational, occupational, and individual factors all influence the likelihood that an individual will make an error. These factors should be considered when designing work places and work practices. They should also be examined during incident investigations, to help identify any latent conditions that contribute to errors and develop systems-based solutions to minimise the risk of repeated errors.

Human error is part of the human condition – it cannot be eliminated. However, while we cannot change the human condition, we can change the conditions under which people work (Reason, 1997). NOPSEMA is increasing its focus on the contribution of human factors to potential major accident events. We will provide more detailed information on our human factors strategy in the near future. Watch this space.

Reference: Reason, J. (1997). Managing the risks of organizational accidents. Ashgate: Aldershot.

Comments welcome on new draft guidance notes

NOPSEMA is progressing its safety case guidance notes project to assist industry operators in the planning and development of facility safety cases.

Two more draft guidance notes are now available on our website for comment:

- 1. **Supporting safety studies:** this is the final part of the FSA suite of five guidance notes which are designed to help operators through the process of conducting a formal safety assessment in support of the evidence that risks are reduced to a level that is ALARP. This document includes guidance on the fire and explosion risk assessment (FERA) and the evacuation, escape and rescue analysis (EERA) studies required by the regulations as well as other, commonly utilised studies.
- 2. **Emergency planning:** addressing the preparation, implementation and testing of emergency plans for offshore facilities.



Depending on the feedback received, NOPSEMA will consider running workshops in Perth and Melbourne to discuss these two draft guidance notes. We welcome your suggestions and feedback by email to: <u>safetycaseguidance@nopsema.gov.au</u>. To access the published guidance notes and details about the safety case guidance notes project, visit the <u>NOPSEMA website</u>. DANGER

ASBESTOS CANCER AND LUNG DISEASE HAZARD

Reminder – asbestos is prohibited in all worksites in Australia

Asbestos is a hazardous substance with carcinogenic properties. The six forms of asbestos are actinolite, anthophyllite, tremolite, crocidolite (blue asbestos), amosite (brown asbestos) and chrysotile (white asbestos). The four major health conditions caused by exposure to asbestos include asbestosis, benign pleural disease, mesothelioma and lung cancer.

Since the introduction of a nation-wide ban on the use of all forms of asbestos in December 2003, the use of asbestos and products containing asbestos is now prohibited in all workplaces including at facilities within the offshore petroleum industry. This prohibition is specified in Regulation 3.4 and Schedule 3.2 of the Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2009.

Regulation 3.4 imposes a general prohibition on the use of certain hazardous substances. The hazardous substances to which this prohibition is applied are listed in Schedule 3.2 of the regulations, which includes all of the above types of asbestos and the exceptions for use for specified permitted circumstances. This general prohibition does not apply to the use of chrysotile asbestos if the chrysotile asbestos is in a product specified in the National List of Exemptions contained in Schedule 2 to the National Model Regulations for the Control of Workplace Hazardous Substances as per Regulation 3.4(5).

Clause 9 of Schedule 3 to the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* places a duty of care obligation on the operator of a facility to take all reasonably practicable steps to ensure that:

- a. the facility is safe and without risk to the health of any person at or near the facility; and
- b. all work and other activities carried out on the facility are carried out in manner that is safe and without risk to the health of any person at or near the facility.

The operator of a facility must therefore have systems and procedures in place relevant to both the asbestos prohibition and to the management of other hazardous substances. Furthermore, these systems should be described in the safety management system description section of the safety case for the facility.

Safe Work Australia has published two national codes of practice for the management, control and safe removal of asbestos. These documents propose practical and safe methods for managing asbestos hazards and are intended to support the Australia-wide ban on the use of asbestos. Visit Safe Work Australia to obtain a copy.



Asbestos is prohibited on facilities within the offshore petroleum industry as per the OPGGS (Safety) Regulations 2009





In this example the vessel operators reviewed the maximum persons on board applicable for their TEMPSCs to properly reflect the actual average weight of members of their workforce, so as not to overload the TEMPSCs or their davits.

Design a "facility" rather than build a "vessel"

The article "When does a vessel require a safety case?", also in this issue, highlights that where a vessel or structure is defined as a "facility" under the *Offshore Petroleum Greenhouse Gas Storage Act 2006*, there is a legal obligation for the operator of that facility to submit a safety case to NOPSEMA for acceptance, prior to commencing operations in Australian Commonwealth waters.

This includes vessels which are:

- providing accommodation for persons working on another facility
- drilling or servicing a well for petroleum or associated work
- laying pipes or doing work on an existing pipe
- erecting, dismantling or decommissioning another facility.

Under a safety case, an operator of a facility must take all reasonably practicable steps to ensure that the facility, and its operations, are safe and without risk to the health of any person at or near the facility to a level that is as low as reasonably practicable (ALARP).

NOPSEMA CEO, Jane Cutler, discussed the importance of designing new vessels with this in mind at the International Marine Contractors Association (IMCA) Safety and Environment Seminar, held in Rio de Janeiro on 21 March.

In her presentation entitled *"Design a facility, rather than build a vessel"*, Ms Cutler took the opportunity to address stakeholders in the marine and vessel construction

industries about the inherent design requirements that must be met in order to bring vessels into Australian waters for the purpose of commencing petroleum operations.

Ms Cutler told seminar attendees that while aspects of prescriptive marine vessel codes of practice, rules and standards intended for marine vessels could be used to make part of a safety case, it should not be assumed that the risk control measures considered suitable for a vessel will necessarily meet the ALARP requirements for a facility.

Vessels in hydrocarbon hazard environments require gas detection systems and prompt emergency action elements in their design, and should include additional safety features, such as totally enclosed motor propelled survival craft (TEMPSCs) and persons on board (POB) weight monitoring systems, to ensure their safety case is accepted.

Ms Cutler's presentation can be found at <u>nopsema.gov.au</u> and is recommended reading for operators interested in bringing vessels into Commonwealth waters for the purpose of conducting petroleum activities.



When does a vessel require a safety case?

NOPSEMA has recently received a number of enquiries from vessel owners regarding the requirement for their vessel to have an accepted safety case. Where the vessel is to be undertaking the activities mentioned in the previous article, it is clear that these vessels will meet the definition of a **facility** as defined in Clause 4 of Schedule 3 to the *Commonwealth Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGSA) and therefore will require an accepted safety case prior to commencing activities.

However, in some cases the information provided indicates that either:

- the activities proposed to be conducted are not included in the legislated activities which would lead to the vessel being a **facility**, and therefore no safety case would be required, or
- the proponent is unclear about the activities that may be conducted using the vessel, which makes it difficult to determine whether the vessel will be a **facility** and therefore whether a safety case is required.

During these enquiries, vessel owners have indicated to NOPSEMA that they have been advised that they require an accepted safety case for their vessels in order to tender for contract work. At this stage, the vessel owner often does not have a clear understanding of the services to be tendered for.

The definition of a **facility** is legislated and is not a matter of individual company preferences. The definition is activity-based, and the safety case contents specified in the Safety Regulations require the operator to describe the activities that will, or are likely to take place at or in connection with the facility. The proponent must first understand the nature of the activities intended and then, prior to contemplating the preparation of a safety case, determine whether a safety case is actually required at all.

The assessment of a safety case for a vessel which may never be, and perhaps is never intended to be, a regulated **facility**, or the assessment of several safety cases for different vessels all vying for the same contract is not an efficient process for industry or for NOPSEMA.

To reduce unnecessary effort by all parties and heighten awareness of this issue, NOPSEMA proposes to expand the Operator Nomination and Registration form that is part of the process of nomination of an operator of a facility under Regulation 2.1 of the Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2009 [OPGGS(S)]. This form will prompt the person making the nomination to provide details relating to the proposed activities to be conducted to determine whether the vessel or structure will be a **facility** when it conducts those activities. Depending on the nature of the proposed facility, the form will also request details relating to that particular campaign of work proposed to be undertaken.

The form can be found at: <u>www.nopsema.gov.au/safety/</u> operator-nomination-registration/operator-nomination

The basis for NOPSEMA accepting a nomination of a person as the operator of a facility or a proposed facility, is that NOPSEMA must be satisfied that the person has the day-to-day management and control of the facility and its operations (Regulation 2.3). A fundamental pre-requisite of satisfying the requirements of Regulation 2.3 is that the vessel or structure for which operator registration is being sought will actually qualify as a **facility**. Therefore, if an operator nomination does not include sufficient information to satisfy NOPSEMA that a vessel will be a **facility**, NOPSEMA will reject the nomination.

Prospective facility operators are reminded to assure themselves that the activities conducted by, or at, the vessel will be such that the vessel will be defined as a **facility** prior to the submission of an operator nomination form, scope of validation or safety case for the vessel.

Please note that in addition to the exclusions detailed in Clause 4(6) of Schedule 3 to the *OPGGSA 2006*, Regulation 1.6 of the OPGGS(S) Regulations 2009 specifies certain vessels that are not defined to be **facilities** based on specified activities being undertaken.





Are you environmentally ALARP?

In assessing an environment plan (EP), NOPSEMA must ask if there are *"reasonable grounds for believing that the plan demonstrates that the environmental impacts and risks of the activity will be reduced to as low as reasonably practicable."* (OPGGS(E), Regulation 11 (1)(b)).

ALARP promotes positive change and continuous improvement. As technology and knowledge improve, potential environmental management solutions that were once impracticable may become practicable. However, rather than requiring continuous improvement at any cost, ALARP allows for outcomes that are also reasonable.

The principle of ALARP has long been applied in the offshore petroleum industry, but in some cases poorly understood. So what does ALARP mean? The concept is well tested with the legal definition dating back to 1949 to an English legal case by Lord Justice Asquith in Edwards v National Coal Board [1949] who said:

"Reasonably practicable is a narrower term than 'physically possible' and seems to me to imply that a computation must be made by the owner, in which the quantum of risk is placed on one scale and the sacrifice involved in the measures necessary for averting the risk (whether in money, time or trouble) is placed in the other; and that if it be shown that there is a gross disproportion between them — the risk being insignificant in relation to the sacrifice — the defendants discharge the onus on them." Edwards v National Coal Board [1949] All ER 743 (CA)

Using this definition, the EP must demonstrate that the sacrifice required to reduce the environmental impact and risks of the activity further would be grossly disproportionate to the environmental benefit gained.

In this context, the ALARP test is about operators demonstrating in their EP that options to further reduce risks and impacts are not reasonably practicable. When planning a petroleum activity, operators should ask themselves: *"Can we implement a better environmental management option?"*

There are many ways in which an EP can demonstrate that the environmental impacts and risks have been reduced to ALARP. One way is a selection process with a comparison of environmental benefits and associated sacrifices (e.g. cost, operability implications, safety implications, etc.) for each environmental management option.







Image of the Western Legend courtesy of WEL

Entering the "area to be avoided"

NOPSEMA is now publishing information on its website about authorisations granted for vessels to enter and be present in the area to be avoided.

The **area to be avoided** is a defined area of the Bass Strait which a relevant vessel may not enter, or be present in, without authorisation from NOPSEMA.

The area is detailed in Schedule 2 to the Offshore Petroleum and Greenhouse Gas Storage Act 2006 and is defined as being:

So much of the area to which Schedule 2 applies as comprises waters of the sea that:

- a. are not within the coastal waters of Victoria or within any area on the landward side of those coastal waters; and
- b. *are not within a safety zone.*

Petroleum and Greenhouse Gas safety zones within the <u>area to be avoided</u> are defined as <u>prescribed safety zones</u>. If the owner or master of a relevant vessel, that is not an exempt vessel in relation to a prescribed safety zone, enters or is present in the area to be avoided, other than in accordance with an authorisation provided by NOPSEMA, they are committing an offence which carries a maximum penalty of seven and a half years' imprisonment.

Only vessel owners can make applications for authorisations to enter the area to be avoided by lodging a completed form (<u>available here</u>) by email to <u>safetyzones@nopsema.gov.au</u>. You can subscribe to updates about the publication of petroleum safety zone administration documents, the publication of notices establishing petroleum safety zones in the Government Gazette, or the authorisation of a vessel to enter the area to be avoided by emailing <u>safetyzones@nopsema.gov.au</u>. Please include your first name, surname, preferred email address, position, company and mobile phone number or other contact details.



Extract from OPGGSA 2006 Schedule 2



Analysing environmental performance data can aid continuous improvement within the Australian offshore petroleum industry, and reduce environmental risk.

Measuring what you manage: national environmental incident data

Since 1 January 2012, NOPSEMA has been receiving and collating environmental performance data relating to petroleum activities submitted by operators. Similar to the treatment of monthly accident and dangerous occurrence summary reports submitted by operators, NOPSEMA intends to analyse and compile this environmental performance data and produce a summary report for industry.

This will be the first time that this sort of industry-wide data on environmental performance will be available and presents an opportunity for the oil and gas sector to identify areas of performance that could be improved. Operators should use their objectives, standards and The regulations stipulate notification requirements for reportable incidents occurring, including oral and written reports to NOPSEMA and other government agencies. In addition, operators must submit a report on all recordable incidents that occur each calendar month by day 15 of the following month. Further information can be found in the Offshore Petroleum Greenhouse Gas Storage (Environment) Regulations 2009 and the NOPSEMA website. Reporting templates are available on the NOPSEMA website and written reports should be sent to: submissions@nopsema.gov.au.

Continuous improvement model

measurement criteria and internal incident reporting to drive their own continual improvement in environmental performance, but an industry summary report will allow operators the opportunity to benchmark their performance against an industry average to drive further improvement.

Since 1 January 2012, there have been eight reportable environmental incidents and 21 recordable environmental incidents reported to NOPSEMA. The majority of these incidents involved releases of hydrocarbons or chemicals to the environment, typically as a result of subsea equipment failure or fuel/ product transfer activities.





Regulatory activities

As at 27 April 2012

Note: Data presented here may vary as further information becomes available.

Assessments

The number of assessments submitted increased in February mainly due to a number of well activity applications. A total of eight assessments were rejected during March and April 2012.

ASSESSMENT		S	ubmitte	d	Accep	oted / ag advised	reed /	Rejeo	cted / ref	used
			2012			2012			2012	
Assessment type	Subtype	Feb	Mar	Apr	Feb	Mar	Apr	Feb	Mar	Apr
Safety case	new	2	3	2	1				1	1
Salety case	revision	4	9	12	8	3	3	1		2
Diving project plan	N/A									
Diving safety	new			1						
management system	revision				1					
Pipeline safety	new									
management plan	revision									
	application to establish/renew	2	1		1		1	1		
Petroleum safety zones	application to enter									
Areas to be avoided	application to enter	1	1			1			1	
Scope of validation	N/A	9	8	1	7	5	4			
Request for exemption under OHS regulations	N/A									
Well activity application	N/A	6	15	8	10	9	15			
	new	1	3	3	1	1	3			
Well operations management plan	variation									
	N/A									
Diving start-up notice	N/A	5	2	3	4	2	1	2		2
For incomparing the last	new	9	5	5	4	3	2		1	
Environment plan	revision	1								
	resubmission of a new plan	1	1			1		1		
Total		41	48	35	37	25	29	5	3	5

Note : In some instances, a single assessment may be submitted for multiple facilities.



Inspections

The number of planned inspections can fluctuate according to operator availability and activities. NOPSEMA inspected an average of 7.25 facilities per month from January to April 2012, with an average of 14 recommendations made per facility.

	2011							2012					
Туре	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May		
Facilities inspected	2	7	4	12	11	6	6	8	11	6			

Inspection scopes

Some of the more common topic scopes covered in the March and April inspections included:

Inspection scopes – examp	les – Mar 2012 to Apr 2012
Diving related emergency management	Meeting with HSRs
Monitoring, auditing and review	Training and competency
Themed audit – contractor management	Themed audit – maintenance management

Inspection recommendations

Some of the recommendations issued in the recent inspections included the following:

Inspection recommendations – e	examples – Mar 2012 to Apr 2012
Following up previous recommendations	Install overhead signs to indicate the location of PA boxes and repair the PA boxes at sea deck.
Ensure that the inflatable life raft davit guide wire slings and pad eyes are fit for purpose.	Rectify defective sight glass for the Helideck No.2 AFFF foam tank (inboard AFT) to enable positive confirmation of adequate tank level.
Communicate the asbestos management plan to all members of the workforce.	Rectify the low insulation resistance readings on the 120V systems of the emergency switchboard and the forward machinery space switchboard.
Inspection of all areas on the drill ship be carried out to identify and rectify loose or inappropriately stored materials.	Provide HSR training to meet <i>OPGGSA 2006</i> requirements (NOPSEMA accredited courses).



Accidents and dangerous occurrences

NOPSEMA was notified of 53 reportable OHS incidents and four reportable environmental incidents during March and April 2012.

			20	11				20	12	
ТҮРЕ	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr
ACCIDENTS										
Death or serious injury	1	1				1		1		
Incapacitation >3 days lost time injuries	2		1	2	2	1			1	1
Accidents subtotal	3	1	1	2	2	2	0	1	1	1
DANGEROUS OCCURRENCES										
Could have caused death or serious injury	4	5	2		3	4	1	3	1	1
Could have caused incapacitation >3 days lost time injuries	2	1	4	4	5	6	1	4	5	3
Fire or explosion		1		2			1	1		
Collision marine vessel and facility										
Uncontrolled hydrocarbon release >1 - 300 kg	1		3	1	2	3	2	1	3	
Uncontrolled hydrocarbon release >300 kg	2			1					1	
Uncontrolled petroleum liquid release >80 - 12 500 L	1			1						
Uncontrolled Petroleum Liquid release >12 500 L										
Well kick >50 barrels										
Unplanned event - implement emergency response plan	7	6	9	7	16	5	16	4	4	7
Damage to safety-critical equipment	11	4	7	3	3	5	7	6	9	14
Pipelines – significant damage										
Pipelines - substantial risk of accident										
Pipelines - kind needing immediate investigation										
Other kind needing immediate investigation	2	1	1	3	1	1		3	1	2
Dangerous occurrences subtotal	30	18	26	22	30	24	28	22	24	27
OHS incidents total	33	19	27	24	32	26	28	23	25	28
ENVIRONMENTAL INCIDENTS										
EM - other							1		1	2
EM - hydrocarbon / petroleum fluid release								2		
EM - chemical release								2		1
EM incidents total							1	4	1	3
OHS and EM Incidents Total	33	19	27	24	32	26	29	27	26	31
Other non reportable (environmental, exercise, etc.) (As notified under OPGGS(S) Regulation 2.41.)	2	5	2	4		2		3	3	



Complaints

There was one complaint in April 2012 regarding the sewage system on a mobile facility.

		2011							2012						
ТҮРЕ	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May				
Complaints	0	1	2	0	2	0	1	2	0	1					

Injuries

There were no lost time injuries reported in January and February this year but one in March.

	2011							2012					
ТҮРЕ	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May		
INJURIES													
Lost time injuries (LTI >1 day)*	3	1	2	2	4	2	0	0	1				
Alternative duties injuries (ADI)	3	2	1	2	2	3	1	2	6	data r	iot yet		
Medical treatment injuries (MTI)	0	3	1	4	7	3	4	5	2	avan			
Total recordable cases (TRC)	6	6	4	8	13	8	5	7	9				
* ITLincludes lost time injuries less than	* ITI includes lest time injuries less than three days												

* LTI includes lost time injuries less than three day

As reported under OPGGS(S) Regulation 2.42. (written injury summaries submitted not less than 15 days after the end of each month)

Enforcement actions

Ten enforcement actions were issued in March and April - five of these to a single facility for a range of issues, including a failure to report incidents.

			20	11					2012	Apr May Mar Apr Mar Apr 3 2 1 3 1		
ACTION TYPES	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	
Verbal advice/warning												
Written advice/warning	1	3	1			1	1		3	2		
Improvement notice		1	10	5	1	11	4	2	1	3		
Prohibition notice	1			3					1			
Intent to withdraw SC acceptance	1											
Withdrawal of acceptance												
Prosecution brief												
TOTAL	3	4	11	8	1	12	5	2	5	5		





Upcoming events

• 2 May 2012

Cost Recovery Impact Statement workshop, Perth (TBC)

- 3 May 2012 NOPSEMA non-government agencies briefing, Perth
- 10 May 2012 NOPSEMA Advisory Board meeting, Canberra
- 13 to 16 May 2012 APPEA Conference and Exhibition, Adelaide
- 31 May 2012 NOPSEMA environment workshop, Perth
 - 13 to 14 June 2012International Association of Drilling Contractors World Drilling
Conference and Exhibition, Barcelona
- 29 June 2012
- NOPSEMA environment workshop, Perth









Feedback

NOPSEMA welcomes your comments and ideas on offshore health and safety regulation, NOPSEMA's role and your preferred communication methods and publications. Please direct media enquiries, requests for publications, and enquiries about NOPSEMA events to <u>communications@nopsema.gov.au</u>. Operators and other employers are encouraged to circulate this newsletter to their workforce. Past issues of this newsletter are available from NOPSEMA's website at <u>nopsema.gov.au</u>.

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