

REGULATOR

: 2013

Issue 6: 2013

Contents	
From the CEO	1
Effectively involving the workforce in safety	2
NOPSEMA's engagement on safety	3
Effective environmental consultation	3
Sufficient information	4
NOPSEMA's engagement on environmental management	5
Process safety and performand standards	ce 6
Reducing regulatory burden	7
Stakeholder information session to discuss 'one stop shop'	ons 7
Revised National Plan for Mari Environmental Emergencies	time 8
Priorities for international regulators	9
NOPSEMA joins the regulator community at AELERT	10
Managing the risk of marine pest species	11
Reporting environmental incidents	12
Revised levy arrangements from 1 January 2014	12
Activity and performance	13
Schedule of events	16

From the CEO

Earlier this year, I remarked on the importance of planning and setting objectives, but also noted how unforeseen factors can influence those plans or push them off track. This final issue of NOPSEMA's newsletter for 2013 provides an opportunity to reflect on what we have learnt in



the past year to better prepare for next year's challenges, including those we may not foresee.

The performance-based offshore regulatory regime is geared towards industry having the flexibility to apply the best range of techniques, draw on lessons from the past and engage the expertise of its workforce to remain responsive to unforeseen factors. Optimising that response also comes through submitting the plans and processes for assessment by a regulator with the authority, expertise and objectivity to assess and, where necessary, challenge the content. This approach recognises that, while events may arise unexpectedly, the full negative consequences of those events can be avoided if there are effective and responsive systems and strategies already in place to minimise harm.

Demonstrating to NOPSEMA, well in advance, how measures mitigate risks to workforce safety and impacts on the environment to a level that is as low as reasonably practicable is a preliminary, albeit fundamental, step towards a safe and environmentally-responsible offshore industry. A further crucial step is for the operator to fulfil the commitments made in an accepted plan, by applying resources and using skilled, competent people to implement, operate and audit systems to ensure that they are in place and functioning as intended.

In 2013, NOPSEMA encountered a range of challenges and opportunities in carrying out its core functions. Some challenges prompted the authority to improve how it communicates the principles of objective-based regulation and its approach to holding industry to account. Others provided a platform to review industry's presumptions around what is acceptable to stakeholders and the wider community, in terms of safety and environmental impact. All demonstrated that, as the national regulator, NOPSEMA is held to the highest standards of accountability and regulatory practice.

This final issue of *the Regulator* for 2013 documents some of the many ways NOPSEMA interacts with others to deliver on its objectives and help drive continuous improvement in both industry and regulatory performance. 2014 will bring further opportunities – planned and unexpected - for us to demonstrate resilience and effectiveness. Thanks to colleagues, counterparts, stakeholders and the wider community for your constructive feedback. I wish you all a very happy festive season with family and friends ahead of a safe and fruitful new year.

ff Cutte

Jane Cutler, CEO

Effectively involving the workforce in safety

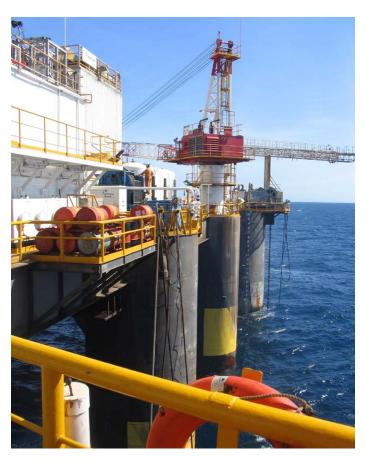
Offshore Petroleum and Greenhouse Gas
Storage (Safety) Regulation 2.11 requires that an operator of a facility demonstrates to NOPSEMA's satisfaction that in the development or revision of the safety case for the facility, there has been effective consultation with, and participation of, members of the workforce. This demonstration must be supported by adequate documentation.

In this context, members of the workforce include those members who are identifiable before the safety case is developed; and working, or likely to be working, on the relevant facility. Part 3 of Schedule 3 to the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGS Act) sets out the broad consultative provisions that apply, including provisions for the establishment of designated workgroups, the election of health and safety representatives and the establishment of OHS committees.

A documented demonstration for the purposes of this regulation could include a combination of:

- A description of the process by which the workforce was involved in safety case development inclusive of specific references to the actual safety management system document(s) (a copy or summary of applicable documentation could also be submitted with the safety case).
- Actual records clearly identifying which participants were members of the workforce, as defined above.

NOPSEMA recognises that in some instances, a safety case may be developed before the entire workforce is recruited. This means that the expectation to consult with 'members of the workforce' is seen as being difficult to achieve. NOPSEMA suggests that in such cases it is incumbent on the operator to consult as much as is reasonably practicable. This can be done in a number of ways – seeking input from the workforce on other facilities of a similar type; consulting with those members of the workforce who are available; seeking input from organisations that typically employ potential members of the workforce (e.g. contractors). In any event, the operator of the facility should ensure that they have satisfied NOPSEMA in demonstrating how they have attempted to meet these expectations, what results were



achieved and if there are any remaining steps they intend to take once further members of the workforce are available for consultation.

Safety Regulation 2.11 requires that an operator of a facility must also demonstrate to NOPSEMA that the safety case provides adequately for effective consultation with, and the effective participation of, the members of the workforce, so that they are able to arrive at informed opinions about the risks and hazards to which they may be exposed on the facility.

Further guidance can be found in NOPSEMA's <u>Safety Case</u> – <u>Involving the workforce</u> guidance note.

The facility operator also has the duty under Clause 9(2)(i) of Schedule 3 to the OPGGS Act to take all reasonably practicable steps to develop, in consultation with members of the workforce and relevant workforce representatives, a policy in relation to occupational health and safety. This policy must enable the operator and members of the workforce to cooperate effectively in promoting and developing measures to ensure the occupational health and safety of people at the facility. It must also provide adequate mechanisms for reviewing the effectiveness of those measures and for the making of an agreement between the operator and members of the workforce that provides for appropriate mechanisms for continuing consultation.

Further guidance can be found in NOPSEMA's <u>Safety Case</u> – <u>Safety Management Systems</u> guidance note.

NOPSEMA's engagement on safety

In 2013, NOPSEMA's Safety and Integrity division held approximately 200 stakeholder meetings, predominantly with facility operators as a part of continued engagement with industry around improving safety performance. These included operator liaison meetings, and meetings related to NOPSEMA's assessment, inspection and enforcement activities. These meetings supplemented NOPSEMA's OHS planned inspection program, which includes discussions with health and safety representatives, and the workforce more broadly, about safety at offshore facilities.

Also focusing on safety, NOPSEMA published its first four human factors information papers on issues relevant to the offshore petroleum industry and establish a number of webpages providing introductions to human error, human reliability analysis and safety culture. These are designed to provide information about the contribution of human factors knowledge to risk minimisation within Australia's objective-based regime. NOPSEMA also published a report on its National program: Safety culture improvement initiatives in the Australian offshore petroleum industry.

NOPSEMA representatives have delivered a number of presentations on offshore safety at industry events throughout the year, on topics including <u>safety culture</u>, <u>process safety and performance standards</u> and <u>safety in design</u>. NOPSEMA continues to be an active member of the International Regulator's Forum and to be a strong advocate for the exchange of safety-related information between international counterparts, including circumstances around offshore incidents. NOPSEMA continues to work with government and key stakeholders to optimise the effectiveness of the consultative <u>tripartite forum</u> focusing on improved safety outcomes at offshore facilities.



Effective environmental consultation for offshore petroleum activities

In the course of preparing an environment plan and before any petroleum activity can commence in NOPSEMA's jurisdiction, an operator must first consult with the people or organisations "whose functions, interests or activities may be affected" by the activity.

Operators should view stakeholder consultation not only as a legislated requirement but an opportunity to build understanding about a proposed activity among affected stakeholders and to learn how those stakeholders view the activity, its risks, impacts, and control measures. Measures adopted as a result of consultation may assist operators to demonstrate in their submission to NOPSEMA that the risks and impacts of their proposed activity are reduced to as low as reasonably practicable (ALARP).



Sufficient information

Since commencing in January 2012, NOPSEMA has identified significant improvements to demonstrated stakeholder consultation by operators, however, further improvements in the provision of sufficient information in consultation material could help to reduce 'consultation fatigue', result in expedient and informative feedback to operators from interested parties, and shorten assessment timeframes.

Under the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations, an operator must demonstrate in their environment plan submission to NOPSEMA that consultation has been carried out according to the legislation. Critical to demonstrating that appropriate consultation has taken place is a record showing the operator supplied "each relevant person sufficient information to allow the relevant person to make an informed assessment of the possible consequences of the activity" on their own functions, interests or activities.

One available consultation practice is to provide generic activity 'fact sheets' to all stakeholders. In some cases, however, the provision of generic information may not be sufficient for all relevant persons to engage efficiently and effectively in the consultation process. Operators have access to much more detailed information on the specific impacts and risks of their activity and, while that level of information may not be relevant to all stakeholders,

NOPSEMA encourages its use in consultation material tailored to best suit a particular purpose or relevant person. Tailored consultation material may also include information about environmental management decisions and reasoning to support stakeholders' informed assessments. Tailoring consultation material aims to ensure that relevant persons are given the information that they need to make an informed assessment of the possible consequences a petroleum activity would have for them.

Under Regulation 14(9) of the Environment Regulations, the implementation strategy detailed in an environment plan must provide for appropriate consultation during the operational phase of the activity. Operators should be mindful that any change to the details provided to stakeholders while the environment plan was being prepared, and before the commencement of operations, may necessitate the provision of updated consultation materials during operations. NOPSEMA will often accept an environment plan in which an operator has made a commitment to provide further information post-acceptance of an environment plan, however, the authority has received feedback from stakeholders indicating that this commitment is often not being met. Any commitments made to stakeholders during the consultation period and documented in an environment plan submission to NOPSEMA can be the subject of an environmental management compliance inspection by the authority. It is important that operators meet the commitments they make to stakeholders to ensure that relevant persons are provided with sufficient information and to ensure compliance with the accepted environment plan and legislation.

For more information about consultation see the Environment plan content requirements guidance note at nopsema.gov.au



NOPSEMA's engagement on environmental management

In 2013, NOPSEMA's Environment division continued to interact with stakeholders through mechanisms designed to provide clear information about the authority's role and approach and share lessons learned. The authority's engagement with stakeholders included liaison with operators to communicate advice on the Environment Regulations in the interest of raising the quality of submissions, minimising assessment timeframes and promoting industry compliance.

For the period 1 July 2013 to 30 September 2013, NOPSEMA conducted 54 operator liaison meetings. Of these, 12 were focussed on broad or strategic advice on a range of matters including oil spill response, post-spill scientific monitoring, financial assurance and regulatory

requirements for submission or revision of environment plans for petroleum activities. The remaining 42 meetings were with individual operators to provide advice and regulatory guidance on specific environment plan submissions. NOPSEMA has received feedback that this kind of engagement is resulting in a better level of understanding amoung operators of the regulatory requirements in an environment plan, and the authority has noted an improvement in the quality and consistency of environment plan submissions.

Most recently, NOPSEMA provided or participated in information sessions for stakeholders to progress transitioned environment plans and the Australian Government's proposal to establish a 'one stop shop' for offshore environmental approvals. In October, the authority hosted an Acoustic Impacts Seminar, as part of the International Regulators Offshore Safety Conference, which covered research and industry progress towards improved understanding of underwater acoustic impacts. NOPSEMA took part in oil spill and risk framework discussions with Drill Safe and Marine Safe forums and has participated in discussions with APPEA working groups on a range of environmental matters including oiled wildlife response, dispersants and risk identification.

NOPSEMA has identified a range of core principles that the authority believes require further communication and discussion with industry, such as ALARP, oil spill preparedness and response arrangements and will seek to facilitate further engagement with industry in 2014.

Process safety and performance standards

In November, NOPSEMA delivered a keynote presentation at the inaugural Hazards Australasia Conference in Perth. The presentation focused on process safety and performance standards and described how the two are inextricably linked and form a cornerstone of NOPSEMA's regulation of safety in the Australian offshore petroleum industry.

Taking a facility lifecycle approach, performance standards are the link between an operator's formal safety assessment, described in their safety case, and their ongoing operations and risk management. This is crucial as the formal safety assessment identifies hazards with major accident event (MAE) potential, assesses the risks associated with those hazards and identifies control measures to reduce the risk to a level that is as low as reasonably practicable. Performance standards clearly define the level of performance the MAE control measures must achieve to provide this level of risk reduction. Operations and ongoing risk management sustains the integrity of the control measures.

Recent NOPSEMA inspection findings have highlighted the need for operators to set well-defined performance standards that are specific, measurable, appropriate, realistic and timely (SMART). Operators should ensure performance standards are clearly linked to specific control measures and the requirements of the formal safety assessment. Appropriate inspection, testing and review processes should be in place to verify the integrity of control measures, as well as define processes to address any shortfalls that these activities may identify.

Operators should also ensure that members of the workforce on the facility are provided with the necessary information, instruction training and supervision needed to ensure they understand and are familiar with the control measures on their facility, the performance standards they are required to meet and the action that must be taken if they are not met.

For further information see NOPSEMA's guidance note on Control measures and performance standards. To view the 'Process safety and performance standards' presentation visit the 'Presentations' page under the 'Resources' tab at nopsema.gov.au

Performance standards in a facility's lifecycle



Reducing regulatory burden

Over the past twelve months, NOPSEMA has been actively investigating and pursuing opportunities to reduce the unnecessary regulatory burden on members of the offshore petroleum industry.

In 2013, NOPSEMA has worked closely with the former Department of Resources, Energy and Tourism, now Department of Industry, to progress initiatives to reduce regulatory burden. Effective cooperation is integral to reducing any unnecessary regulatory burden and achieving regulatory streamlining, because the Department is responsible for all policy and legislative change affecting NOPSEMA's role and functions. Outcomes to date include:

- a review of the Environment Regulations
- a joint taskforce with the Department of Industry and the Department for the Environment to streamline offshore petroleum environmental approvals
- a review led by the Australian Maritime Safety
 Authority to create a single 'National Plan for Maritime
 Environmental Emergencies' to clarify oil spill response
 arrangements for offshore petroleum.

A number of other amendments to the legislation covering NOPSEMA will see further reductions in regulatory burden around environmental approvals, once the laws come into force.

NOPSEMA has also initiated measures to improve its own processes to deliver regulatory best practice. Outcomes to date include:

- removal of arbitrary regulatory approvals and reporting obligations utilised by previous regulators especially in respect of environmental regulation
- removal of requirement for operators to provide unnecessary details of activities in an environment plan, such as vessel and rig name
- promotion of inclusion of multiple petroleum activities (e.g. exploration wells) in one environment plan without need for follow-up bridging documents
- creation of a single form of reporting for both OHS and environmental incidents.

In 2014, NOPSEMA will be responsible for implementing a range of processes to build efficiencies, including those arising from the review of Environment Regulations. NOPSEMA will continue to work with the Department to inform amendments to the legislation and review its own processes to ensure continuous improvement in the delivery of regulatory best practice.

Stakeholder information sessions to discuss 'one stop shop'

In Issue 5 of the Regulator, NOPSEMA reported that the Minister for Industry, the Minister for the Environment and NOPSEMA's CEO signed an agreement to deliver a 'one stop shop' approval process for offshore petroleum activities in Commonwealth waters.

Since then, members of the taskforce comprising the Department of Industry, Department of the Environment and NOPSEMA held information sessions to discuss the draft reports released for public comment on 22 November. The sessions were an opportunity for interested parties to better understand the streamlining proposal for endorsing NOPSEMA's environmental management authorisation process administered under the OPGGS Act.

The document covering NOPSEMA's authorisation processes (the Program) was of particular interest at the sessions. Specifically stakeholders asked how the Program, if endorsed, would address <u>protected matters</u> and how the Program would meet the same regulatory requirements as the *Environment Petroleum Biodiversity Conservation Act 1999* (EPBC Act). In addition to answers provided at the sessions, the taskforce invited stakeholders to submit their comments formally for consideration during the consultation period (which closed 20 December).

The taskforce will consider comments received during the consultation period in finalising its reports which are due to be submitted to the Minister for the Environment in February 2014. The Minister for the Environment will then consider the endorsement of NOPSEMA under the EPBC Act with a view to making a decision by the end of February 2014. Further information can be found on the Department of Industry's website, industy.gov.au/streamlining. NOPSEMA will be issuing updates on this and other environmental matters through its email subscription service.



Revised National Plan for Maritime Environmental Emergencies

Australia's National Plan to Combat Pollution of the Sea by Oil and other Hazardous and Noxious Substances (the National Plan) has been significantly reviewed and updated. This review has been the most comprehensive undertaken in the National Plan's forty year history and involved all of the key stakeholders directly engaged with National Plan activities, including NOPSEMA.

One of the key outcomes of the review is the combination of the existing National Plan and the National Maritime Emergency Response Arrangements into a single National Plan for Maritime Environmental Emergencies. In addition, the review also took into account the outcomes of the 2011 national oil pollution risk assessment, lessons learned from major Australian and international incidents, and existing international obligations under the International Convention of Oil Pollution Preparedness, Response and Co-operation 1990 and 2000 Protocol dealing with Hazardous and Noxious Substances.

The National Plan provides a strategic outline of the prevention, preparedness, response and recovery arrangements for marine pollution and maritime emergencies. It explicitly addresses the risk of oil and chemical pollution response from both shipping and offshore petroleum activities, and includes maritime casualty management arrangements in a single national framework. Taken together, these updates ensure that maritime emergency response and management integrates more effectively with Australia's disaster management arrangements across all jurisdictions and levels.

The changes to the National Plan have relevance for the offshore petroleum industry, particularly in relation to their oil spill preparedness and response arrangements. The developments follow valuable discussions between industry, regulators and state and national maritime response agencies, including at the oil spill preparation and response forum convened by NOPSEMA in April 2013.

The revised National Plan is due to come into force by mid-2014 and supporting documents can be found in the National Plan pages on the Australian Maritime Safety Authority website, amsa.gov.au

Priorities for international regulators

In Issue 5 of the Regulator, NOPSEMA reported on the 2013 International Regulators' Offshore Safety Conference in Perth, which provided an opportunity for industry representatives and regulators to come together to share experiences and knowledge to improve global offshore safety standards.



To read the conference communiqué or to access presentations delivered at the conference visit irfconference2013.com.au The 2014 IRF annual general meeting will be held in Cancun, Mexico. For future information regarding this event and other IRF activities visit irfoffshoresafety.com

A key component of the conference program was the round table discussion sessions where delegates helped inform the future priorities of the International Regulators' Forum (IRF). During the first round table session delegates took stock of the work completed to improve safety standards across the industry since the Montara and Macondo incidents. While noting that major accident events (MAEs) have strengthened global cooperation and collaboration on risk management measures and regulation, delegates also considered whether enough had been done to protect people, the environment and communities should something go wrong again. The session produced valuable observations on areas needing further improvement or renewed effort. These have been summarised and published on the IRF website.

The second roundtable session focused on setting priorities for improving process safety, integrity management and reducing uncontrolled hydrocarbon releases. A common view among delegates was the need to better engage with the workforce and to continuously share lessons at a global level for improved safety performance.

Drawing from the conference panel discussions, roundtable sessions and the subsequent annual general meeting, IRF members agreed to continue to prioritise their work with industry to tackle persistent challenges including:

- overcoming barriers to sharing data and lessons learned from offshore incidents
- further understanding, explaining and promoting a 'process safety culture'
- addressing the challenge of ensuring the competency of those working in, and leading, the industry
- achieving meaningful engagement of all those working offshore
- developing common international standards.



NOPSEMA joins the regulator community at AELERT

In November, NOPSEMA's environment specialists attended the 2013 conference of the Australasian Environmental Law Enforcement and Regulators Network (AELERT), joining over 300 environmental regulatory officers and affiliates to 'drive better regulatory practice together'.



AELERT's keynote speaker Malcolm Sparrow, Professor of Practice of Public Management at Harvard University, noted that in the aftermath of significant incidents, the community demands even more effective and comprehensive regulation. Professor Sparrow highlighted to delegates the importance of using a full suite of regulatory tools, such as education and promotion, together with compliance and enforcement.

At the conference, NOPSEMA presented a poster on the importance of setting well-defined environmental performance objectives and standards in an objective-based regime. The inclusion of "performance objectives, environmental performance standards and measurement criteria" in an environment plan is a requirement under Environment Regulation 13(4). Performance objectives and standards are critical to allow an operator to measure their own performance and allow for NOPSEMA to monitor and, where necessary, enforce compliance. For more information, see NOPSEMA's guidance note on Environment plan content requirements.

The merits and challenges of risk-based and objective-based regulation were a common theme in presentations from a number of Australian and New Zealand-based regulators. NOPSEMA's poster served as a point of discussion and learning between the authority and other regulators in industries such as waste management and mining, where similar risk-based approaches are also being applied. To view the Holding industry to account: Environmental performance objectives and standards poster, visit the 'Presentations' page at nopsema.gov.au



Managing the risk of marine pest species

Through its liaison with state authorities, NOPSEMA is aware that the Asian green mussel, a highly invasive marine pest species with the potential to negatively impact the marine environment, has recently been detected in Western Australian waters. Under the Environment Regulations, operators are required to manage the risks associated with threats such as marine pests to a level that is as low as reasonably practicable (ALARP) and acceptable.

Vessels and immersed equipment associated with offshore petroleum activities are a potential habitat for marine pests and a vector for marine pest translocation. The establishment of a marine pest species, such as the Asian green mussel, could cause significant economic, environmental and human health consequences. For more information about the Asian green mussel see the marine pest alert released by the Department of Fisheries Western Australia.

Offshore petroleum operators should carefully consider the particular circumstances of their activity and the range of controls that may be required to demonstrate that the impacts and risks of a marine pest incursion are reduced to a level that is ALARP. Operators should also consider the level of performance that is required of control measures used to manage those risks. The number and type of controls that may be required to manage marine pest risk may vary between petroleum activities; the Environment Regulations provide an operator with the flexibility to tailor their

risk management to the impacts and risks unique to the activity. For more information see NOPSEMA's Environment plan content requirements guidance note.

When managing marine pest risk, it is important that operators are aware of any recent and pending changes to biosecurity legislation in Australia. The various states and the Northern Territory have differing requirements for marine pest management in their respective jurisdictions and NOPSEMA encourages operators to use the consultation provisions in the Environment Regulations to engage with agencies that have biosecurity management responsibilities. Measures adopted as a result of any such consultations may assist operators to demonstrate that their marine pest risks are reduced to a level that is ALARP and acceptable. In August, NOPSEMA presented an 'Overview of OPGGS Environment Regulations' at the WA Marine Biofouling Workshop that included information about consultation requirements in the preparation of an environment plan and the relevance to marine pest risk. To view the presentation click here.

Reporting environmental incidents

Stakeholder notification is important in the event of an environmental incident, because the consequences of the incident might impact the activities or interests of other agencies or organisations.

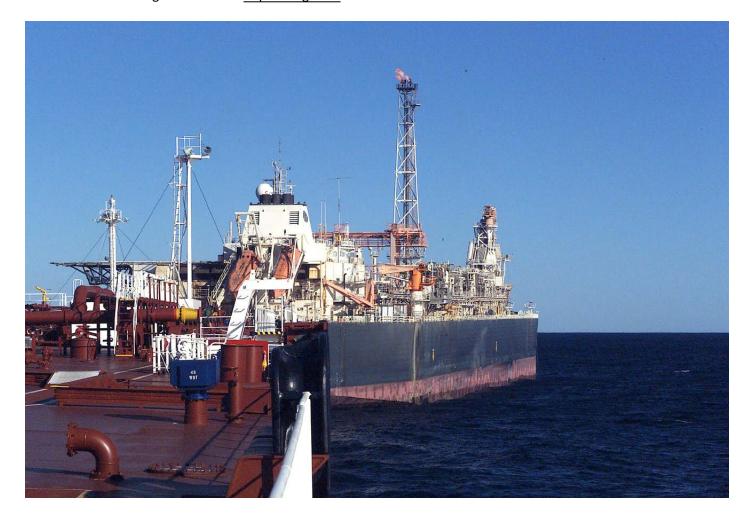
In the event of a reportable environmental incident, Environment Regulation 26AA requires an operator to notify NOPSEMA, the National Offshore Petroleum Titles Administrator (NOPTA), and the department of the responsible state or Northern Territory minister. NOPSEMA has identified that operators are not always notifying these parties of reportable environmental incidents occurring in the offshore petroleum industry.

Notifying the relevant parties when a major accident or significant hydrocarbon release to the environment occurs aims to facilitate state/territory-level involvement in any oil spill response or NOPTA's role in resource management issues. Operators must provide written notification of reportable environmental incidents to these parties as soon as practicable after notifying NOPSEMA.

Further guidance can be found on the 'Notification and reporting of environmental incidents' page under the 'Environmental management' tab at nopsema.gov.au

Revised levy arrangements from 1 January 2014

As an independent regulator for offshore safety, well integrity and environmental management, NOPSEMA is funded through levies paid by industry. The cost recovery arrangements are defined by law and aim to ensure NOPSEMA is properly and sufficiently resourced to effectively regulate offshore petroleum activities. From 1 January 2014, titleholders and activity operators will pay amended levies to fully cover costs incurred by NOPSEMA in regulating petroleum industry activities. The changes follow a full consultation and review process. The arrangements will remain in place until 31 December 2015 and are explained in the Cost Recovery Impact Statement report published at nopsema.gov.au



Activity and performance

As at 6 December 2013

NOPSEMA is currently reviewing the way it presents data in *the Regulator*; this review will consider the reporting of data quarterly. If you have any feedback or suggestions email communications@nopsema.gov.au

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

Assessments

ASSESSMENTS SUBMITTED		2013				
Assessment type	Subtype	Sep	Oct	Nov		
Diving start up notice	Not applicable	2	3	2		
Fundament alon	New	9	8	9		
Environment plan	Revision	5	5	0		
PSZ application	New	0	1	1		
Cofety	New	1	1	0		
Safety case	Revision	5	6	5		
Scope of validation	Not applicable	3	4	4		
Well activity application	Not applicable	2	6	15		
Well operations management	New	0	5	1		
plan	Variation	1	2	1		
	TOTAL	28	41	38		

ASSESSMENTS NOTIFIED AND COMPLETED		Acce	Accepted/agreed/ advised			refused/not d/ recalled/i		% Notified within specified timeframes					
		2013											
Assessment type	Subtype	Sep	Oct	Nov	Sep	Oct	Nov	Sep	Oct	Nov			
Diving start-up notice	Not applicable	1	1	1	1	2	1	100%	100%	100%			
	New	2	2	3	0	0	0	100%	100%	100%			
Environment plan	Revision	1	3	0	0	0	0	100%	100%	100%			
PSZ application	New	0	1	0	0	0	0	N/A	100%	N/A			
	New	0	0	1	0	0	0	N/A	N/A	100%			
Safety case	Revision	7	2	1	1	0	4	100%	100%	100%			
Scope of validation	Not applicable	2	0	1	0	0	1	100%	N/A	50%			
Well activity application	Not applicable	3	3	13	0	0	0	100%	100%	100%			
Well operations management	New	1	0	3	0	0	0	100%	N/A	100%			
plan	Variation	1	1	1	1	0	0	100%	100%	100%			
	TOTAL	18	13	24	3	2	6						

Note: In some instances, a single assessment may be submitted for multiple facilities
Assessments still in progress are not included.

Inspections

Time	2012		2013									
Type	Dec	Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov										
Facilities /wells /activities inspected*	6	8	15	15	16	17	19	8	3	13	9	18

st Note: A single inspection can comprise multiple facilities, wells or activities.

Complaints

Time	2012	2012 2013											
Туре	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	
OHS complaints	0	0	2	1	0	0	0	0	0	1	1	0	
EM complaints	0	0	0	1	0	0	0	0	0	0	2	1	

Note: A number of complaints were re-categorised as 'information only'.

Injuries

T	2012	012 2013										
Туре	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
Lost time injuries (LTI >1 day)*	1	1	1	3	1	1	0	0	1	2	1	
Alternative duties injuries (ADI)	4	4	1	2	7	4	4	3	2	4	2	Data not available
Medical treatment injuries (MTI)	2	1	3	0	4	2	2	2	1	2	1	available
Total recordable cases (TRC)	6	14	7	6	5	5	12	7	4	8	4	

^{*}LTI incl. lost time injuries less than 3 days

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

Some operator reports were outstanding at the time of this publication

Enforcements

Fufamana ation to make	2012						2013					
Enforcement action types*	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
Improvement notice	3	0	1	0	2	9	4	2	3	1	2	1
Intent to withdraw WOMP acceptance	0	1	0	0	0	0	0	0	0	0	0	0
Prohibition notice	0	0	2	1	0	0	0	0	0	0	0	0
Request for revised SC	0	0	0	1	0	1	0	0	0	0	0	0
Request for revised EP	1	0	16	4	6	5	0	0	1	0	0	0
Intent to withdraw EP acceptance	0	0	0	0	0	0	0	0	0	1	0	0
Written advice/warning	0	1	0	1	2	2	4	0	1	0	0	0
TOTAL	4	2	19	7	10	17	8	2	5	2	2	1

^{*}Does not include directions, verbal advice/warnings or investigation-related notices (do not disturb notice or removal of plant or sample)

Note: 'Request for revised EP' data includes one request in Oct-Dec 2012 and 20 requests in Jan-March 2013 for revision to an environment plan transitioned from the former designated authorities

Incident notifications

INCIDENT TYPE			2013	
INCIDENT TYPE		Sep	Oct	Nov
Accidents	Death or serious injury	0	0	0
and dangerous	Incapacitation ≥ 3 days LTI	2	1	1
occurrences	Accidents total		1	1
	Could have caused death or serious injury	2	1	2
	Could have caused incapacitation ≥ 3 days LTI	2	0	2
	Fire or explosion	0	0	0
	Collision marine vessel and facility	0	1	1
	Uncontrolled HC release >1 300 kg	3	0	3
	Uncontrolled HC release >300 kg	0	0	0
	Uncontrolled PL release >80 12 500 L	1	0	0
	Uncontrolled PL release >12 500 L	0	0	0
	Unplanned event implement emergency response plan	12	19	12
	Damage to safety-critical equipment	11	6	8
	Other kind needing immediate investigation	8	4	1
	Well kick >50 barrels	0	0	0
	Pipeline – substantial risk of accident	0	0	0
	Pipeline – kind needing immediate investigation	0	0	0
	Pipeline – significant damage	0	0	0
	Dangerous occurrences total	39	31	29
	Accidents and dangerous occurrences total	40	32	30
Reportable	Hydrocarbon/petroleum fluid release	2	0	0
environmental	Chemical release	0	0	1
incidents	Drilling fluid/mud release	2	0	0
	Fauna incident	0	0	0
	Reportable EM incidents total			
Recordable	Non HC air emissions	0	1	
environmental	Breach of procedural control	1	0	
incidents	Chemical spill	4	0	
	Hydrocarbon gas release/air emissions	6	4	
	Hydrocarbon spill (<80 L)	7	5	Data not
	Solid waste discharge/dropped object	2	0	available
	Other unplanned liquid discharge	0	1	
	Spill - no discharge to marine environment	0	0	
	Equipment not functioning	0	0	
	Recordable EM incidents total	20	11	
	EM incidents total	24	11	1
Not reportable	OHS not notifiable	1	0	0
incidents	EM not notifiable	1	0	1
	Recordable environmental incident	0	0	0
	Information provide to NOPSEMA	0	2	4
	Not reportables total	2	0	5
	GRAND TOTAL	66	43	36

Note: As notified under OPGGS(S) Regulation 2.41 and OPGGS(E) Regulation 26

GLOSSARY OF ACRONYMS										
ATBA	Area to be avoided	НС	Hydrocarbon	PSZ	Petroleum safety zone					
EM	Environmental management	OHS	Occupational health and safety	sc	Safety case					
EP	Environment plan	PL	Petroleum liquid							



Schedule of events

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

• 6-9 April 2014 APPEA conference and exhibition, Perth

• 5-8 May 2014 International oil spill conference, Savannah













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 <u>subscription form</u>. NOPSEMA's services include news and information on environmental management, HSRs, media releases, safety alerts and *the Regulator* newsletter.

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