

Offshore petroleum diving assessment process



The National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) is Australia's independent regulator for health and safety, structural (well) integrity and environmental management for all offshore oil and gas operations and greenhouse gas storage activities in Commonwealth waters, and in coastal waters where regulatory powers and functions have been conferred.

Offshore petroleum diving assessment process

Offshore commercial diving is undertaken throughout the lifecycle of an offshore energy project from supporting its construction, to carrying out inspections and repairs, and installing and removing equipment. The work is inherently dangerous requiring its workforce to operate specialised equipment in an underwater environment that does not support human life. To protect the health and safety of the diving workforce, the Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2009 require acceptance of a **diving safety management system (DSMS)** and **diving project plan (DPP)** before any diving may commence.

DSMS

Prepared by the diving contractor, in consultation with their workforce, a diving safety management system (DSMS) sets out how the diving contractor will manage risks to the health and safety of their workforce, while undertaking any diving project, to as low as reasonably practicable (ALARP).

The DSMS must demonstrate, through its contents and supporting materials, how the diving contractor will manage the technical and human activities of their diving project, how safety will be ensured in the event of an emergency, and the methods to be used for monitoring and reviewing their activities to ensure the continual improvement of safety arrangements. NOPSEMA's assessment of a DSMS is undertaken by a dedicated team comprised of highly trained and qualified technical experts with many years' of experience in commercial diving. To be accepted, a DSMS must meet all requirements of the Safety Regulations.

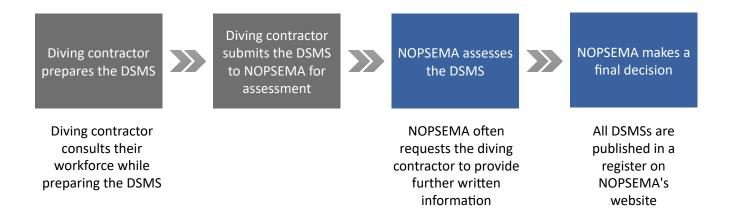
If accepted, a DSMS will remain in force for five years. After five years, a revision must be submitted to NOPSEMA for assessment. A revision of a DSMS must also be submitted to NOPSEMA where the diving contractor has identified a new or increased risk, or has made a change to how their diving activities will be undertaken.

Engaging with the workforce

Workforce consultation and participation is mandatory during the development and revision of a DSMS and DPP. Engagement with the workforce ensures they are informed about the risks they may be exposed to during a diving project, and the control measures and safety management systems to be applied in the management of those risks.

DSMS assessment process

The diagram below provides a broad overview of the DSMS assessment process. NOPSEMA aims to make a decision within 60 days (new) and 28 days (revised), however, as DSMSs vary in their complexity and scope, assessment timeframes may vary.





DPP

When a diving contractor has an accepted DSMS, and an agreed contract of work with a facility operator, then they are required to prepare, in consultation with their workforce and the facility operator, a diving project plan (DPP).

The DPP is a detailed plan developed to manage a specific diving project. It must take into account the requirements of the project and dive site, cover the general principles of the diving techniques to be used and provide contingency procedures for any foreseeable emergency, including retrieving injured and unconscious divers from the water.

The DPP must ensure arrangements between the safety management systems of the accepted DSMS and facility safety case are coordinated and clearly understood, and that there is common understanding

and agreement between the diving contractor and facility operator on issues such as simultaneous operations and emergency response.

All DPPs are assessed by the facility operator in accordance with the requirements of the Safety Regulations. NOPSEMA will assess a DPP where a diving contractor seeks to undertake a diving project where there is no facility operator, such as diving for survey purposes prior to construction of a pipeline or a well that is in a non-producing state.

If a diving contractor makes any changes to the DPP, those changes must be made using management of change procedures in consultation with their workforce and facility operator, and be accepted by the operator. The DPP remains in force for the duration of the diving project.

Monitoring compliance

It is the responsibility of the facility operator to ensure risks at their facility are managed in accordance with the accepted DSMS, DPP and facility safety case. NOPSEMA reviews the safety performance of the diving contractor and facility operator through on-site inspections and the investigation and analysis of incidents, to determine if the Safety Regulations and commitments in the accepted DSMS, DPP and safety case are being followed.

DPP assessment process

The diagram below provides a broad overview of the DPP assessment process. DPPs are assessed by the facility operator against the requirements of the Safety Regulations.





Further information

Regulatory alerts and bulletins, a quarterly magazine, brochures and factsheets, and regulatory guidance including the Environment plan decision-making guideline are published at nopsema.gov.au

Key legislation

Offshore Petroleum and Greenhouse Gas Storage Act 2006 Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 Environment Protection and Biodiversity Conservation Act 1999 Environment Protection (Sea Dumping) Act 1981

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About NOPSEMA

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