

# Diving Submission Assessment

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## 1 Purpose

This policy provides an overview of the approach to assessment of various types of diving-related documents submitted to NOPSEMA.

## 2 Scope

This policy applies to the assessment of a Diving Safety Management System (DSMS), a Diving Project Plan (DPP) and a Diving Start-up Notice (DSN).

## 3 Relevant Legislation

To protect the health and safety of the diving workforce, the Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2024 [OPGGS(S) Regulations] require acceptance of a DSMS, DPP and DSN before any diving may commence.

References to regulations in this document are to those in the Commonwealth **OPGGS(S) Regulations**. Similar arrangements apply in designated coastal waters where the States or the Northern Territory have developed legislation to mirror these requirements, and where powers are conferred on NOPSEMA. Currently, only the Victorian legislation confers powers on NOPSEMA.

The OPGGS(S) Regulations requires a diving contractor to prepare and submit a DSMS and DSN to NOPSEMA for assessment. An assessment of a DPP is undertaken by the facility operator, or in circumstances where there is no operator of a facility in connection with a diving project, NOPSEMA will undertake the assessment.

During the assessment process, NOPSEMA will consider whether a diving submission meets all the requirements of the OPGGS(S) Regulations. The principles described in NOPSEMA Assessment Policy (N-04000-PL0050) are applied to the assessment process across all types of diving-related submissions.

## 4 Diving Assessment Principles

The objectives of the OPGGS(S) Regulations are to:

- encourage industry to continuously improve its safety performance
- adopt best practice to achieve agreed safety protection standards in industry diving operations
- ensure diving operations are carried out in a way that ensures that risk to employees is reduced to as low as reasonably practicable.

Risks will be minimised by ensuring that the following have been put in place (in relation to the health and safety of persons involved in diving activities):

- the identification of hazards, and assessment of risks
- the implementation of measures to eliminate the hazards, or otherwise control the risks
- the implementation of a comprehensive and integrated system for management of the hazards and risks
- the implementation of monitoring, auditing and reviewing to ensure continuous improvement.

#### **4.1 Assessment of information in diving submissions**

For the purposes of an assessment, NOPSEMA will assume that information provided by diving contractors in diving submissions (DSMS, DPP or DSN) is correct. However, if there are any doubts regarding the accuracy of information, NOPSEMA can request further information in accordance with the OPGGS(S) Regulations.

#### **4.2 Adequacy of information in diving submissions**

NOPSEMA will make a judgement on the adequacy of the diving submission based on its content and may seek clarification or request additional information to assist in the assessment of the submission. To expedite the assessment, the diving contractor and NOPSEMA should participate fully and openly in a two-way communication process before and during the assessment, to ensure that any requirements for further information or clarification are addressed in a timely manner.

#### **4.3 Diving submission will be in accordance with the criteria contained in the Regulations**

NOPSEMA's assessment of the diving submission will be in accordance with the criteria contained in the regulations. NOPSEMA's acceptance decision will be based on an assessment of whether the submission is appropriate for the activities of the diving contractor, and whether it complies with the OPGGS(S) Regulations:

- Compliance with OPGGS(S) Regulations, including content requirements of a DSMS (Section 4.4) and DPP (Section 4.16)
- There was appropriate consultation with divers and other members of the workforce in the preparation of the DSMS and DPP, as required by OPGGS(S) Section 4.18
- The DSN contains the required content, as required by OPGGS (Section 4.24)
- Proposed diving activities are consistent with all permissioning documents (e.g. Safety Case, DSMS) and the DPP.

If NOPSEMA decides to reject either a DSMS, DPP or DSN or impose conditions, the diving contractor (or Operator in the case of a DPP is submitted to NOPSEMA) will be given the reasons for the rejection in accordance with the OPGGS(S) Regulations.

### **5 Related Documents**

N-04000-PL0050 – NOPSEMA Assessment Policy

N-04500-GL1222 – Diving Guidelines for DSMS and DPP