

OHS Improvement Notice

Offshore Petroleum and Greenhouse Gas Storage Act 2006, Schedule 3 clauses 78, 78A and 78B

Notice No: 1934

Date: 27/03/2024

To: Allseas Engineering B.V.

In conducting an OHS inspection in relation to the Audacia facility, I [REDACTED] a NOPSEMA inspector appointed under section 602 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (the Act), am satisfied on reasonable grounds that

Allseas Engineering B.V. has contravened a provision of a listed OHS law and is likely to contravene that provision again

AND

As a result, there is, or may be, a risk to the health or safety of a person at the Audacia facility.

The provision of a listed OHS law that I am satisfied Allseas has contravened and is likely to contravene again is Clause 9(1) of Schedule 3 to the *Offshore Petroleum and Greenhouse Gas Storage Act 2006*.

The reasons for my opinion are:

- A dangerous occurrence took place when the supply vessel Felicity had a loss of position during cargo transfer operations from the Audacia facility. This resulted in a container being lifted over the wall around the back deck of the Felicity and swinging in an uncontrolled manner while suspended from the Audacia's crane.
- Approximately 25 minutes before the incident, the Felicity master radioed the Audacia bridge to advise that they were in position but also that the thrust from the Audacia was very strong and request that they *"do something to not wash us away"*. The Audacia bridge personnel acknowledged the Felicity and said they would see what they could do.
- Approximately 15 minutes before the incident, the Felicity master radioed the Audacia bridge again to advise that the Felicity had *"too much power on the thrust in this place...we have got more than 70% now"*. The Audacia bridge personnel acknowledged that the Felicity was at 70% and said he had made some adjustments to the Audacia's thrusters but would see if he could adjust them *"a little bit more"*. During this exchange, the Felicity master advised that the thrusters were reaching 77% of their capacity.
- Approximately 90 seconds before the incident, the Felicity bridge personnel advised the Audacia crane driver that *"we have lost a thruster and need to disconnect"*. At this time, the shipping container being transferred had already landed on the Felicity and the Audacia crane was still connected to the load.
- The decision to continue with the cargo transfer while the Felicity was unable to maintain its position represents a non-compliance with the Audacia's project specific Activity Specific Operating Guidelines (ASOG) for Dynamic Positioning (DP) operations, which is identified in the Audacia safety case as a

safety critical procedure for controlling the risk of potential major accident events involving vessel collision or dropped objects.

- The Audacia ASOG does not explicitly consider cargo transfer operations and the effect that thruster wash from the Audacia may have on a supply vessel. The Allseas procedures, for loading and unloading of cargo from supply vessels, do not explicitly consider the potential for a supply vessel loss of position during lifting operations.
- Allseas, as the operator of the Audacia facility, contravened its duty to take all reasonably practicable steps to ensure that all work and other activities carried out on the facility were carried out in a manner that was safe and without risk to the health of any person at or near the facility by failing to fully implement an appropriate ASOG for the management of cargo transfer and pipe supply operations at the Audacia facility. The contravention is likely to occur again because the transfer of cargo and pipe sections is a regularly occurring activity at the Audacia facility and Allseas has not taken any specific action to address the situation.


As a result of this contravention, I am satisfied that there is, or may be, the following risk to the health or safety of any person:

The failure to fully implement an appropriate ASOG for DP operations for the Audacia facility causes people who are at or near the Audacia facility to be exposed to the risk of vessel collision and uncontrolled crane loads, hazards which are known to have the potential to cause major accident events.

I am satisfied on reasonable grounds that the following action(s) must be taken by the responsible person to reduce or prevent the risk:

1. Revise within 30 days the Audacia's ASOG for the Santos Barossa Project to explicitly account for cargo transfer operations from an adjacent supply vessel and the impact that thruster wash from the Audacia may have on the supply vessel.
2. Ensure that, within 14 days, Audacia personnel responsible for DP operations have acknowledged and are aware of the requirements of the revised Audacia ASOG for the Santos Barossa pipeline project, including the requirement to account to for the impact of thruster wash on supply vessels.
3. Ensure that, within 14 days, Audacia personnel responsible for DP operations are aware of and confirm a "green" ASOG status for any supply vessel before conducting lifting operations for any cargo transfers or pipe resupply at the Audacia.
4. Revise the applicable Allseas procedures for loading and unloading of cargo from supply vessels to consider the potential for a supply vessel loss of position during lifting operations, including the period of time when the Audacia crane is connected to a load which is on the deck of a supply vessel within 30 days.

You are required to take action to reduce or prevent the risk within the number days specified for each action above from the date of this notice.


NOPSEMA INSPECTOR
wA811872

27 March 2024

When the required action(s) has been completed, the Responsible Person is to submit this part of the notice to the following person via:

Post: Level 10, 58 Mounts Bay Road
Perth WA 6000

Email: submissions@nopsema.gov.au

Name: [REDACTED]
Position: **NOPSEMA INSPECTOR**
Contact number: +61 8 6188 8700

By signing below, I confirm on behalf of Allseas Engineering B.V. that the specified action described in Improvement Notice No. 1934 has been undertaken within the period specified.

Signed: _____

Date: _____

(to be signed by responsible person only when the notice has been complied with)

Notes

1. Under clause 78A of Schedule 3 to the Act, a responsible person who fails to ensure that this notice is complied with, to the extent that it relates to any matter over which the responsible person has control:
 - a. commits an offence and may be liable to a penalty of 300 penalty units for the offence; or
 - b. contravenes a civil penalty provision and may be liable to a civil penalty of 400 penalty units.
2. For every day proceeding the initial offence or contravention the notice is not complied with, the responsible person commits an offence or contravention in respect of each day (including a day of a conviction under this clause or any later day) during which the offence or contravention continues.
3. A copy of this notice must be displayed in a prominent place at or near each workplace where work affected by the notice is being performed. It is an offence to tamper with or remove it until the notice has ceased to have effect.
4. The recipient of this notice must ensure that all relevant requirements for giving copies of the notice to certain persons and representatives are complied with in accordance with clause 78b to Schedule 3 to the Act.
5. Under clause 80A of Schedule 3 to the Act, any of the following persons may request the reviewing authority in writing to review the NOPSEMA inspector's decision:
 - the operator of the facility;
 - the titleholder, if the notice is issued to a titleholder;
 - any person to whom an improvement notice has been issued;
 - an employer, if affected by the decision;
 - a relevant health and safety representative; a relevant workforce representative, if requested by a member of the workforce affected by the decision;
 - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.