



**NOPSEMA**

Australia's offshore  
energy regulator

# DNS and VANS - What's changing?

April 2025 Information Session

[nopsema.gov.au](https://nopsema.gov.au)



# New work, health and safety regulations



- A review of Australia's offshore safety regime conducted by the Department of Industry, Science and Resources (DISR) identified improvements that could help strengthen and enhance offshore worker safety outcomes.
- To implement these, the OPGGS Act and the OPGGS Safety Regulations have now been amended.
- The new regulations reflect changes to the Offshore Petroleum and Greenhouse Gas Storage Act 2006, which was amended by Parliament in May 2024, and published in December 2024.
- The changes will come into force on **12 June 2025**.

# Monthly Information Sessions

- February – AEP hosted session, general overview of the changes
- March – Key topics: Safety Cases, Safety Critical Systems, HSRs
- April – Follow up Safety Cases Session
- **April – Key Topics: Design Notification Scheme (DNS), Vessel Activity Notification Scheme (VANS)**
- May – Key Topics: Notifications and Monthly Reporting
- June – Key Topics: to be advised

## At a glance:

### **Mandatory Design Notification Scheme**

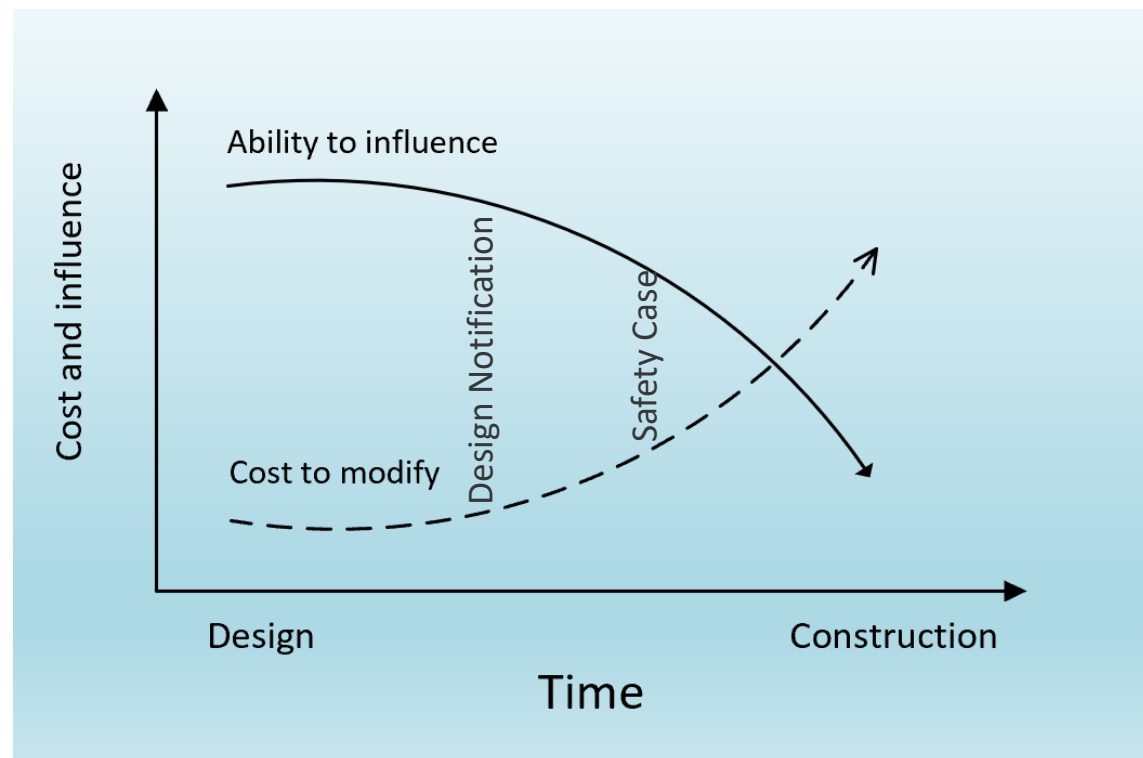
- Allowing consultation with NOPSEMA on the design of production and CCS facilities.
- NOPSEMA will not accept or reject the notifications but provide advice.

### **Vessel Activity Notification Scheme (VANS)**

- Operators will be required to notify NOPSEMA when a vessel becomes and ceases to be:
  - a facility
  - an associated offshore place (AOP) in relation to a facility

## Design Notifications

- What is a Design Notification
- What does it apply to
- When should it be submitted
- Content requirements



# Design Notifications

## What is a Design Notification

- **Demonstrating the concept and design reduces risk to ALARP**
  - The design notification scheme introduces early engagement with NOPSEMA at the design phase of project development. The purpose of the scheme is to provide for early engagement and to set regulatory boundaries within which to assess design concepts and demonstrate that the proposed design for a facility reduces safety risks to ALARP
- NOPSEMA do not accept or reject a design notification
- The safety case remains the permissioning document



# Design Notifications

## What isn't a Design Notification

- It is not a process to arrive at an optimised design
- It does not consider the economics of the design
- It does not concern environment and wells except where there is a safety consequence – the Design Notification is concerned with Safety

There are differences to existing schemes such as the UK HSE and OIR notification schemes

- Level of detail is based on the information available at the time of submission
- Requires a description of alternatives considered
- Demonstrate risk is reduced to ALARP

# Design Notifications

## What does it apply to

- New or significantly altered:
  - Production facilities
  - Greenhouse Gas (GHG) facilities
- Is a narrower definition of a facility than under the Act





## Design Notifications

### What does it not apply to

- Support vessels
- Construction vessels – Design Notification applies to a production or GHG facility
- Licensed pipelines
- Subsea tiebacks

If in doubt, ask NOPSEMA



## Design Notifications

### What does it apply to – significantly altered

- Significantly altered facilities
- Must be a change in function, e.g.
  - FSO to FPSO
  - Addition of compression to a well head
  - Production to CCS / GHG facility
- Brownfields activities not enough on its own
- Safety case may still be required

If in doubt, ask NOPSEMA

# Design Notifications

## When should it be submitted?

- No explicit timing, but descriptive requirements
- Early enough that comments by NOPSEMA can be considered in the design
- Must be before construction
- When there is a selected concept
- Implied limit: sufficient development of concept to address design notification content requirements
- If the only way to address a comment by NOPSEMA so as to reduce risk to ALARP is by changing the design, then this must be done for the safety case to be accepted
- An argument that it would be too costly to change the design to reduce risk would not be accepted at the safety case acceptance stage

### 2.4H Requirements of design notification

*For the purposes of subsection 2.4G(2), the design notification for a new production facility or a new GHG facility (the **new facility**) must:*

*(a) be submitted to NOPSEMA:*

- (i) in sufficient time to allow for any comments made by NOPSEMA to be taken into account in the final design decision; and*
- (ii) before any construction or alteration work is commenced;*

### 2.4H Requirements of design notification

*(d) include a description of the following:*

- (i) the design process (from the initial concept to the submitted design) for the new facility;*

## Design Notifications

### Transitional Arrangements and Commencement of Scheme

- If a final design decision was made before 12 June 2025 then a Design Notification is NOT required
- If in doubt – engage with NOPSEMA

June 2025

| Sunday | Monday | Tuesday | Wednesday | Thursday                 | Friday | Saturday |
|--------|--------|---------|-----------|--------------------------|--------|----------|
| 1      | 2      | 3       | 4         | 5                        | 6      | 7        |
| 8      | 9      | 10      | 11        | 12<br><b>DNS Starts!</b> | 13     | 14       |
| 15     | 16     | 17      | 18        | 19                       | 20     | 21       |
| 22     | 23     | 24      | 25        | 26                       | 27     | 28       |
| 29     | 30     |         |           |                          |        |          |

# Design Notifications

## Content requirements

- Reg. 2.4H provides a list of items that must be included
- Description of:
  - Selection process – including the criteria for the selection
  - Selected concept and why it was selected in terms of reducing risk to ALARP
  - Enough information that NOPSEMA have an understanding of the proposed concept
- Reg 2.4H(g), (h) and (i) includes specific design features that must be described
- **How does the design reduce risk to ALARP**

### **2.4H Requirements of design notification (PART OF!)**

*(d) include a description of the following:*

*(i) the design process (from the initial concept to the submitted design) for the new facility;*

*(ii) the design and performance standards used to guide the design process;*

*(e) include a description of the chosen design for the new facility, including:*

*(i) diagrams of the design; and*

*(ii) a summary of other design options that were considered; and*

*(iii) for a vessel or structure that is to be repurposed—the justification of the suitability for repurposing the vessel or structure; and*

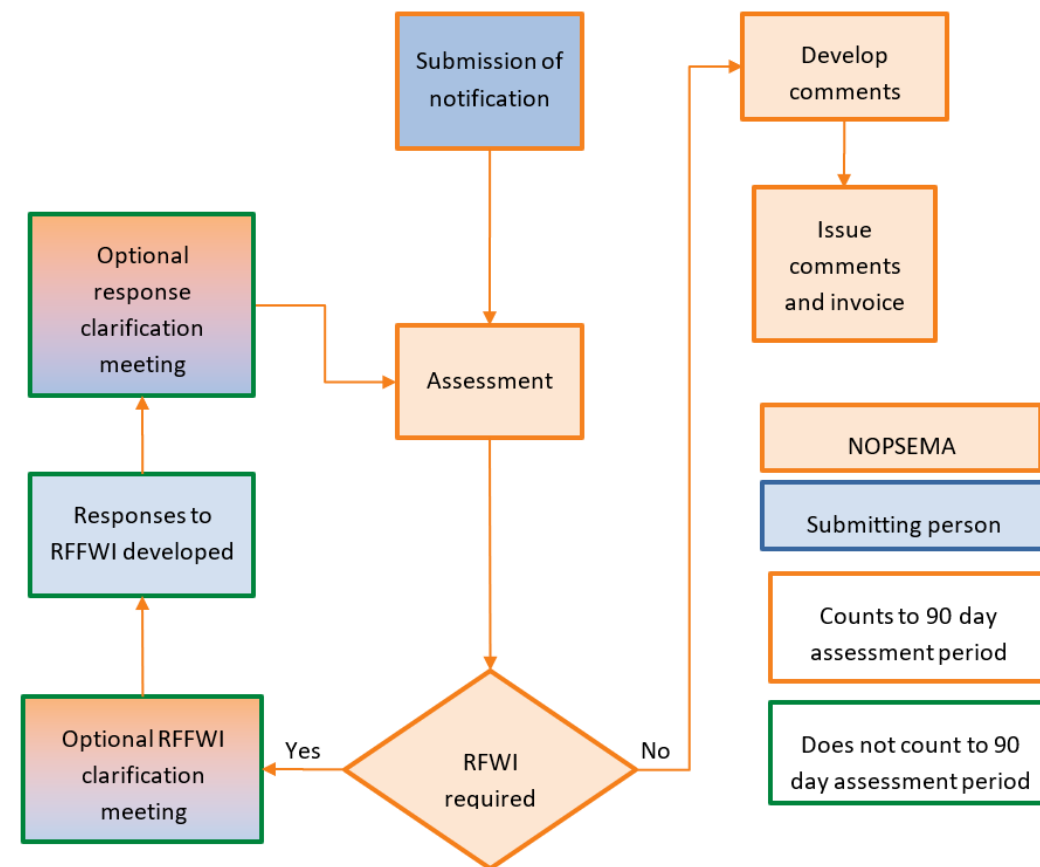
*(iv) the criteria used to select the design in the design notification and the process by which the selection was made;*



# Design Notifications

## Process and Outcomes

- Based on safety case process
  - Will be a cover sheet to be submitted with the notification
  - Opportunities for clarification meetings
  - RFFWI process
  - Concordance table
- 90 days for assessment BUT time not counted when queries are with the person submitting
- Outcome is a list of comments which must be addressed in the safety case – how to do this will be addressed in the revised safety case guidance note



# Vessel Activity Notification Scheme (VANS)

## Legislation

- Clause 83B of Schedule 3 to the OPGGS Act
  - OPGGS Safety Regulation 2.42B – Duty to notify NOPSEMA when vessel becomes a facility or an associated offshore place
  - OPGGS Safety Regulation 2.42C – Duty to notify NOPSEMA when vessel ceases to be a facility or an associated offshore place
- Requires that if a vessel becomes a facility or an associated offshore place (AOP) in relation to a facility, the operator of the facility must notify NOPSEMA
- Requires that if a vessel ceases to be a facility or an associated offshore place (AOP) in relation to a facility, the operator of the facility must notify NOPSEMA

# Vessel Activity Notification Scheme (VANS)

## What needs to be included in notification

- Vessel becoming a facility or an AOP in relation to a facility:
  - a) the name, address, telephone number and email address of a nominated person who can be contacted by NOPSEMA for the purposes of the vessel activity notification scheme mentioned in clause 83B of Schedule 3 to the Act;
  - b) the name of the facility or associated offshore place;
  - c) the name of the title relevant to the facility or associated offshore place;
  - d) the time and date when the vessel became a facility or an associated offshore place;
  - e) the intended purpose for which the vessel became a facility or an associated offshore place.
- Vessel ceasing to be a facility or an AOP in relation to a facility:
  - a) the name, address, telephone number and email address of a nominated person who can be contacted by NOPSEMA for the purposes of the vessel activity notification scheme mentioned in section clause 83B of Schedule 3 to the Act;
  - b) the name of the facility or associated offshore place;
  - c) the name of the title relevant to the facility or associated offshore place;
  - d) the time and date when the vessel ceased to be a facility or an associated offshore place.

# Vessel Activity Notification Scheme (VANS)

## Process and who makes notification and timing

- HOW:
  - Notifications should be sent to NOPSEMA submissions email  
[submissions@nopsema.gov.au](mailto:submissions@nopsema.gov.au)
- WHO:
  - Notifications for vessels becoming and ceasing to be **facilities** are made by the **facility operator**, i.e. vessel owner, manager...
  - Notifications for vessel becoming and ceasing to be an **AOP in relation to a facility** are made by the **facility operator**, i.e. the operators of the platform, FPSO, pipeline etc. that the AOP is in relation to.
- WHEN:
  - Notification for a vessel **becoming** a facility or AOP are required to be submitted within **24 hours** of the change
  - Notification for a vessel **ceasing** to be a facility or AOP are required to be submitted **as soon as practicable** after the change

# Vessel Activity Notification Scheme (VANS)



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## DRAFT Form Template

### Vessel Activity Notification

#### Notification of BECOMING or CEASING to be a facility or AOP

|   |  |                          |                             |                             |
|---|--|--------------------------|-----------------------------|-----------------------------|
| 1. Submitted by (facility operator) <sup>1</sup>  | [Operator organisation name]           |                          |                             |                             |
| 2. Is the vessel becoming or ceasing to be a facility or Associated Offshore Place (AOP)<br>(see Instructions for Use)  | Vessel becoming a facility             | <input type="checkbox"/> |                             |                             |
|   | Vessel ceasing to be a facility        | <input type="checkbox"/> |                             |                             |
|   | Vessel becoming AOP to a facility      | <input type="checkbox"/> |                             |                             |
|   | Vessel ceasing to be AOP to a facility | <input type="checkbox"/> |                             |                             |
| 2a. Name of vessel facility <sup>2</sup>  | [Registered facility name]             |                          |                             |                             |
| 2b. Name of relevant platform facility <sup>2</sup>   | [Registered facility name]             |                          |                             |                             |
| 2c. Name & IMO number of vessel becoming AOP  | [Vessel name]                          | [IMO number]             |                             |                             |
| 3. When the vessel became or ceased to be a facility or AOP   | Date:                                  | dd.mm.yyyy               |                             |                             |
|   | Time:                                  | hh.mm                    | am <input type="checkbox"/> | pm <input type="checkbox"/> |
| 4. Nominated person who can be contacted by NOPSEMA for the purposes of the vessel activity notification scheme   |  |                          |                             |                             |
| Name  |  |                          |                             |                             |
| Address   |  |                          |                             |                             |
| Telephone number  |  |                          |                             |                             |
| Email address   |  |                          |                             |                             |
| 5. Title location of change to facility or AOP  |  |                          |                             |                             |
| For <b>becoming</b> a facility or AOP only:<br>6. Intended purpose for which the vessel became a facility or an AOP (e.g. project, activity to be undertaken) |  |                          |                             |                             |

### Instructions for use

1. Complete the form as follows:

- For a vessel becoming a facility, complete questions 1, 2, 2a, 3-6.
- For a vessel becoming an AOP, complete questions 1, 2, 2b-2c, 3-6.
- For a vessel ceasing to be a facility, complete questions 1, 2, 2a, 3-5.
- For a vessel ceasing to be an AOP, complete questions 1, 2, 2b-2c, 3-5.

2. Send completed form to [submissions@nopsema.gov.au](mailto:submissions@nopsema.gov.au).

- within 24 hours after a vessel becomes a facility or AOP in relation to a facility
- as soon as reasonably practicable after the vessel ceases to be a facility or AOP in relation to a facility



Any questions?



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# Continued engagement with industry

- NOPSEMA is in the process of updating guidance materials regarding these changes.
- Throughout the process, we will provide tailored communications to ensure industry, the workforce and our stakeholders understand the new requirements and what the regulator will seek.
- These communications include information sheets, FAQs, online reference materials, direct e-mails, letters and updates to titleholders, as well as online information sessions with industry

NOPSEMA will also be holding regular information sessions on the following dates:

- ~~• Tuesday 18 March~~
- ~~• Tuesday 8 April~~
- ~~• Tuesday 15 April – DNS, VANS~~
- Tuesday 20 May – Notifications and Reporting
- Tuesday 17 June – TBA



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