

Onshore decommissioning and dismantling of offshore installations - Intervention planning

Open Government status: Open

Target audience: Energy Division (ED) Building Safety and Construction Division (BSCD) and Field Operations Division (FOD) Inspectors, Visiting Officers, Occupational Hygienists, Occupational Health and Specialist Inspectors.

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Summary

A Strategic Intervention Plan to reduce the likelihood of low-frequency, high-impact incidents and deliver robust and consistent regulation of the onshore decommissioning and dismantling (D&D) of offshore oil and gas infrastructure.

Introduction

This guidance has been created to assist the initiation and implementation of the 2019 Onshore Decommissioning and Dismantling of Offshore Installations Strategy and provide nominated Inspectors with a procedure for recording interventions with contractors undertaking D&D work in UK yards. It is intended to be flexible whilst establishing some continuity across the teams carrying out the interventions.

A National Coordinator (NC) role has been established within CD Sector to oversee and coordinate intervention planning and offshore and onshore stakeholder engagement.

Effective interventions will include cooperation and coordination between ED Inspector Management Teams (IMT), FOD and CD Regulatory Teams, CD Policy, Occupational Hygiene Inspectors and Specialist Inspectors at various stages of the process.

Action

Onshore inspections should be carried out by an integrated team consisting of nominated CD and FOD Inspectors supported by Specialist resource and support from ED where appropriate. The team should address all matters relating to compliance with the Construction (Design and Management) Regulations 2015 (CDM) and associated activities such as demolition, structural stability and complex lifting activities.

The team will regulate the occupational health and safety element of this work including work at height, emergency plan arrangements, overside working and occupational hygiene. They will also have oversight of the management of the “off-site” risks such as those normally associated with the waste industry and the operations of the docks, ports, shipyards and breakers. This will include smaller modules removed to be worked on elsewhere.

The intervention preparation and planning in Appendix 1 [\[hyperlink\]](#) sets out the context of the intervention and ensures it sits within the wider CD and FOD workplans.

The intervention report guidance in Appendix 2 [\[hyperlink\]](#) provides additional detail to enable nominated inspectors to plan early interventions, capture the relevant information from planned visits and present it in a consistent and structured fashion.

The report structure template in Appendix 3 [\[hyperlink\]](#) provides a basic structure and areas to consider during early intervention meetings.

Additional CEST/FODSG resource can be allocated to the inspection team through communication with the NC. Depending on the size and complexity of the project, guidance may be required from colleagues; for example, construction specialists' advice regarding demolition, lifting, temporary works and confined spaces, and geographical FOD advice on docks, manufacturing and processing.

Timescales will differ between projects and the inspection team should exercise flexibility when necessary.

The D&D Strategy states;

Where applicable the principles of CDM will be applied to onshore dismantling work and HSE will continue to work with both the onshore and offshore decommissioning sectors to educate on compliance expectations.

To ensure the requirements of CDM are fully understood the NC should lead on the initial planning of the onshore work with the relevant duty holders. The NC should also undertake stakeholder engagement with the onshore and offshore decommissioning sectors to educate on compliance expectations in relation to CDM as set out in Appendix 4 [\[hyperlink\]](#).

The strategy and its implementation will be reviewed by a Project Board comprised of members from ED, CD and FOD on a rolling 24-month period to establish the impact, risks and challenges and decide on the level of further intervention. The life-span of the project has been initially set at five years.

Background

HSE's workplan includes the regulation of onshore D&D of offshore oil and gas infrastructure. CD, ED and FOD have worked together to develop operational arrangements which enable the identification of onshore decommissioning projects and the development of risk-based intervention strategies for each installation/operator or duty holder.

ED, CD and FOD will draw together a range of data, including that generated during early interventions to better inform a risk-based inspection strategy. Appointed members from each Division will then work together to complete, implement and maintain an intervention plan over the next five years. This will be held by CD and FOD respectively.

Inspectors and specialists will be nominated from both FOD and CD to undertake this work and provided with suitable training and support. This will include assistance from FOD Health Unit, Mechanical, Radiation and Electrical specialists and Construction Engineering specialists from the Construction Engineering Specialist Team (CEST).

Organisation

Targeting

The duties under CDM will be applied to the majority of onshore dismantling work. Where the work involves the dismantling of Floating Production Storage and Offloading Units (FPSO) then The Health and Safety at Work Etc. Act 1974 (The Act) will be applied as these are considered to be vessels.

To enable industry to plan for compliance with its onshore activities HSE will engage with offshore operators whilst the asset is still in situ. Joint meetings between the operator, CD and FOD will be facilitated by ED at key stages in the planning process (captured within Divisional operational arrangements). Depending on the nature of the activity Specialist support may also attend. Introductory question sets will be provided to the operators before any initial meeting to maximise efficiency.

Timing

Action outlined above should take place as soon as it is known the asset will return to a UK dismantling yard in order that HSE priorities can be outlined and embedded in the project from the start.

Resources

Each intervention is anticipated to last two years requiring allocation of two inspectors; one each from FOD and CD. All nominees to the D&D team should have completed HSE in-house training.

The estimated resource for each inspector is shown below but each intervention will require different levels of engagement. Specialist assistance will be allocated as and when required.

Activity	What	Total Time Needed
Preparation and planning before arrival onshore	2 Meetings and preparation	1 day
Initial site visit	Attending site	4 days including travel
Planned reviews	Remote meetings x8	4 days
Planned site visits	2 randomised site visits	2x 4 days including travel
Engagement prompted by issues	Remote and/or site visits	c. 4 days

Recording and reporting

Report overall intervention summary to the CDM client

- Provide the CDM client with a conclusion which relates back to the initial aims and objectives of the intervention.
- Highlight the strengths and weaknesses of the intervention. Include any specific feedback from other HSE projects which may have been considered and any client learning points which can be taken from this.

Report overall intervention summary internally

- Provide a conclusion in the Intervention Report which relates directly to the aims and objectives. In addition to the information provided to the CDM client, include learning points specific to HSE.

The Intervention Report Guidance in Appendix 2 [\[hyperlink\]](#) provides additional detail to enable nominated inspectors to plan early interventions, capture the relevant information from planned visits and present it in a consistent and structured fashion.

The Report Structure Template in Appendix 3 [\[hyperlink\]](#) provides a basic structure and areas to consider during early intervention meetings.

Health and Safety

All nominees to the D&D team, including specialist inspectors, should have completed HSE in-house training.

Further References

None

Contacts

The National Coordinator

Appendix 1: Intervention Preparation and Planning

Very early intervention

This should take place as soon as it is known the asset will return to a UK dismantling yard in order that HSE priorities can be outlined and embedded in the project from the start.

The intention is not to influence the client's decisions, rather to ensure that all duty holders are aware of their duties in relation to health and safety as set out in The Act, CDM and other relevant health and safety legislation, and understand how early action can prevent or reduce incidents, injuries and ill health during the subsequent decommissioning and dismantling operations.

Triage system

A triage system has been developed to initiate interventions with offshore asset owner/operators who have commenced the decommissioning process. The time frame for the interventions will vary dependent on the nature and complexity of the job but where job scope allows, this will initially be around 24 months before the asset arrives onshore and will initially involve the NC and ED Single Point of Contact (SPoC) working through the following steps.

New project

The ED SPoC will liaise with the NC once they become aware of an operator's plan to decommission an asset.

Initial planning – interaction with the operator

The ED SPoC, NC and IMT will;

- Explain the offshore and onshore strategy.
- Provide an initial question set for pre-population by the operator to establish whether they are coming into a UK yard, the decommissioning arrangements in place and the level of cohesion and alignment with CDM project requirements, including timescale.
- Arrange a meeting with the operator where their responses are reviewed.
- Agree an initial schedule to follow-up preparation for the arrival of the structure onshore.

At this point if the operator has decided to take the asset to a non-UK location for dismantling HSE will not commence an intervention plan.

Follow-up planning – interaction with the operator

Following the schedule set out during the initial meeting, and considering the responses from the initial intervention meeting, NC, ED SPoC and IMT Inspector will;

- Provide a further question set for pre-population by the operator to establish whether they are coming into a UK yard, the decommissioning arrangements in place and the level of cohesion and alignment with CDM project requirements, including timescale.
- Arrange a meeting with the operator where their responses are reviewed.

Creation of an inspection team

As all interventions are intelligence led, on completion of the above initial meetings, NC and ED SPoC will jointly decide and agree the intervention level, appropriate decommissioning stage, risk focus and objectives. This will prevent periods of inaction and use HSE resource effectively.

The dismantling methodology, applicable legislation and availability of Inspectors will be considered, and an inspection team created.

From the outset it is advisable to have two Inspectors from each division involved. In the past interventions have often failed to span the entire life cycle of a project due to operational obligations. By involving two Inspectors HSE's reputation and professional image is maintained.

Inspection team review and plan

The inspection team will meet with the NC to discuss the work and clarify any issues with the ED SPoC. An initial schedule and dates for the intervention will be prepared.

The inspection team should then develop a project specific risk-based intervention strategy based on the responses from the operator. This should be shared with the NC to ensure resources requirements are identified during planning.

Consider onshore handover

If the inspection team decide that a handover inspection with ED is necessary when the structure arrives onshore, this should be arranged in liaison with the IMT. Sufficient planning time should be allowed to ensure availability of all involved. The need for a handover will differ depending on whether the project is a one-off, particularly complexed or part of a campaign of smaller structures being decommissioned by a single operator/duty holder.

Joint inspections

The inspection team will complete an initial inspection to determine the accuracy of the information provided by the operator in earlier meetings. The project specific risk-based intervention strategy can be amended as necessary to ensure it remains appropriate.

The NC should inform the administrative team and the Concerns and Advice Team (CAT) in order that any incidents or concerns which may arise can be directed to the NC, relevant Principal Inspectors (PIs) and Inspectors.

Application of EMM

Inspection of decommissioning and dismantling operations should consider enforcement action in line with the Enforcement Management Model (EMM) [Enforcement Management Model - Operational \(hse.gov.uk\)](https://www.hse.gov.uk/emm/) [Hyperlink] where evidence of poor working practices is found on site.

The EMM and consideration of enforcement should also be applied to underlying management issues, particularly in circumstances where there is evidence of widespread poor control or a failure to sustain compliance.

Training

All nominees to the D&D team should have completed HSE in-house training and have access to supporting material.

In order to backfill nominated inspectors as they move on, Divisions should encourage shadowing by other inspectors to allow them to become familiar with the industry and the inspection approach. It will also allow FOD inspectors interested in becoming part of the team to gain experience of CDM application.

All training material will be made available to those shadowing nominees. The NC and CD Sector can also provide short sessions to cover specific issues as required.

Appendix 2: Intervention Report Guidance

Once the inspection team has been nominated for a specific project, an intervention plan should be drawn up that follows the principles outlined below.

Initial and follow-up planning meetings with the CDM client

- This is the operator/owner's opportunity to demonstrate how the project will be managed and how they are going to address the HSE priorities. At this point the onshore Regulators have no vires so meetings should be kept to a minimum (recommended no more than approximately two hours). There may be a large contingent present, so consider carefully who will attend from HSE; ideally only the FOD and CD Inspectors allocated to the project.
- The team should identify CDM duty holders, duties, behaviour and culture, and establish areas which may be of concern and require specialist advice and assistance. Any issues should be followed up with the relevant FOD or CD specialists after the meeting and addressed at subsequent meetings to ensure the duty holder is planning to manage these appropriately
- Outline the HSE enforcement expectations and procedures, Fee for Intervention (FFI) and how RIDDORs and concerns will be dealt with.
- Agree the risk control systems which will be sampled, in particular those relating to prevention of ill health, and outline how the intervention plan will be implemented. This may include planned visits at key milestones of the project or inspections of specialist contractors with an HSE Specialist Inspector.
- Agree how the team will track-back to designers where appropriate.

Develop an intervention plan

- Having discussed a basic framework with the CDM client it is necessary to plan visits as soon as possible.
- Decide when visits will be carried out, who will attend and produce objectives for the visit. Some visits may coincide with key milestones; others may be at the discretion of the Inspector depending on the timescale of the project.
- The intervention plan should also include inspections of sub-contractors. It is unlikely that entirely unannounced visits can be carried out but, when visiting contractors, request that the CDM client does not inform them ahead of the visit.
- Agree the basic intervention plan with the CDM client as soon as possible; include it in the follow-up meetings.
- Provide a copy to the NC.

Undertake intervention visits

- Carry out visits as agreed in the plan, tracking-back when required and taking appropriate enforcement action when necessary.

- Provide feedback to the CDM client and all other dutyholders immediately during a 'wash-up' session at the end of the visit. Follow this up on return to the office by e-mail.
- Record the visits in the Intervention Report.
- Keep the NC up to date with planned and completed intervention visits and dutyholders involved.

Report overall intervention summary to the CDM client

- Provide the CDM client with a conclusion which relates back to the initial aims and objectives of the intervention.
- Highlight the strengths and weaknesses of the intervention. Include any specific feedback from other HSE projects which may have been considered and any client learning points which can be taken from this.

Report overall intervention summary internally

- Provide a conclusion in the Intervention Report which relates directly to the aims and objectives. In addition to the information provided to the CDM client, include learning points specific to HSE.

Appendix 3: Report Structure Template

Project:

Site Address:

Lead Inspector:

Brief overview of the project:

This is a £300 million project, which will deliver a new deep-water in-river container terminal ...”

Context of the project

- Is this project part of a wider scheme?
- Are there any other associated works being carried out? For example, upgrades to the local utilities infrastructure, including some major roadworks.

Summary of initial contact visit 28th June 2012

A meeting was arranged with ... Safety Manager for ... and... Programme Director, who outlined the project and the progress so far.

Dutyholders

Client

Principal Contractor

Principal Designer

Contractors

Consider whether you need to liaise with other enforcement authorities such as the MCA, ORR, EA and the Local Authority. Include their contact details.

Initial agreed intervention visits

Date	Details
January	Once the PC has been appointed ... Meeting held....
April	A pre-start meeting Meeting held...
June	Meeting at HSE office, Bootle to discuss ...

Aims and objectives

Make these relevant to the intervention and the project itself. Be realistic about what you want to achieve and how it is going to be done. There is no minimum number, but usually there are 3 or 4 aims and 6 or 7 objectives. This will vary according to the size of the project.

- Aim 1 “To ensure client engagement ... “
- Objective 1 “Ensure thorough induction ... with regard to work on, near or over water ...”

Identified risks

- Interface between construction site operations and the live docks ...
- Failure of complex temporary works ...
- Use of barge mounted equipment such as cranes and piling rigs ...
- Disturbance of unexploded munitions during dredging operations ...
- General construction risks
- Occupational health risks ...

Interventions

This is a table which provides details of each intervention visit, its purpose, outcome, feedback to the client and COIN entries.

Date	Details
31/2	Pre-start meeting ...
24/8	RIDDOR received by HSE ...
13/9	Intervention visit to review and meet sub-contractors ...

Feedback

Immediate feedback should be provided to every dutyholder at the conclusion of the visit. This will allow all parties to agree any actions or recommendations and associated timescales. Feedback should cover the following:

Overall conclusions

- Once the intervention is complete the aims and objectives should be reviewed to establish whether these were met. This will form the basis for the conclusion.
- An intervention summary report can be provided to the PC/client/PD if agreed initially.

Learning points

- This is the information which will assist you and colleagues when considering future interventions so if something didn't work say so.
- Consider whether there is something which could be done differently next time or in different circumstances.
- If the intervention plan had to be amended at any time provide reasons why and whether this could have been avoided.

Appendix 4: Stakeholder Engagement

The Decommissioning and Dismantling Strategy states;

Where applicable the principles of CDM will be applied to onshore dismantling work and HSE will continue to work with both the onshore and offshore decommissioning sectors to educate on compliance expectations.

The information below details how HSE is delivering the education on compliance expectations and with various stakeholders.

Decom North Sea; [Oil and Gas Decommissioning | Decom North Sea](#)

- This is main route for the NC into the industry and the associated supply chain forums. Through working with Decom North Sea, HSE has been able to engage with operators and onshore contractors and identify the areas of concern for the sector. Decom North Sea facilitates HSE delivery of presentations on CDM and HSE priorities to onshore and offshore supply chain forums.
- HSE provides Decom North Sea support with onshore regulatory advice and guidance to industry.
- HSE has presence at Decom North Sea sessions delivered by external providers to provide regulatory position.
- HSE attends Decom North Sea events Decom Live and Decom Week.

It is a not-for-profit organisation liaising with offshore and onshore supply chain to share knowledge and capabilities across the oil and gas decommissioning sector.

Oil & Gas Authority (OGA) / BEIS / OPRED; [Oil and gas: decommissioning of offshore installations and pipelines - GOV.UK \(www.gov.uk\)](#)

The responsibility for ensuring that the requirements of the Petroleum Act 1998 are complied with rests with the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) which sits within the Department for Business, Energy and Industrial Strategy (BEIS).

Operators are required to provide BEIS with decommissioning programmes, including dates, locations, installations decommissioned, method of decommissioning and close-out reports where available.

<https://www.gov.uk/guidance/oil-and-gas-decommissioning-of-offshore-installations-and-pipelines>

Working with these organisations supports HSE delivery of the core CDM message to the offshore and onshore industry.

Oil & Gas UK;

HSE attends presentations and workshops delivered by OGUK and provides regulators' perspective.

Engagement with OGUK supports HSE delivery of CDM guidance and advice to the offshore operators and wider supply chain.

Decom Reg Hub

A partnership of regulatory agencies with a shared interest in oil and gas decommissioning including Scottish Environment Protection Agency (SEPA), OGA and OGUK. Their goal is to build a hub to help the decommissioning sector understand their regulatory obligations, from planning for decommissioning through safe dismantling of infrastructure and disposal of waste. HSE is a partner in this.