

Appendix 1: Initial enforcement expectations (IEE)

If the rotating parts of a drilling rig are adequately guarded the EMM **benchmark** gives a 'nil/negligible' risk of serious personal injury.

Operating an unguarded drilling rig, even with trip wires, gives an EMM **actual risk** of 'possible risk of serious personal injury' resulting in an EMM **risk gap** of 'extreme'. The legal standards are set out in PUWER Regs 10, 11 & 12 and the associated ACoP (see *Further References*).

The IEE is therefore a Prohibition Notice (PN). This will be the case for drilling rigs that:

- are unguarded;
- are poorly guarded;
- have defective or defeated interlocks, and;
- rely on trip-wires.

See Appendix 2 for sample PN wording and Appendix 6 for specific information on trip-wires.

This course of action is straightforward if there is evidence that personnel have already approached or intend to approach the rotating parts. In situations where there is a written system of work - including supervision and exclusion zones with e.g. fencing in place and a strict and viable policy of 'no approach during rotation' - it can be harder to prove risk. Under these circumstances, inspectors are advised to seek SG support before serving a PN.

Ensure you are familiar with Appendix 3 which outlines the main types of drilling and piling rigs and their uses. Note that on piling operations where guards are not expected, a safe system of work including an exclusion zone during rotation must be operated.