

# The Offshore Well Testing Inspection Guide

**Open Government Status**

Fully Open

**Publication Date**

July 2026

**Review Date**

July 2029

**Review History**

| Date      | Changes     |
|-----------|-------------|
| July 2026 | First Issue |

**Target Audience**

OMAR Inspectors / ED Offshore Inspectors / ED Specialist Inspectors

## Contents

|                                                                                 |    |
|---------------------------------------------------------------------------------|----|
| Summary.....                                                                    | 3  |
| Introduction .....                                                              | 3  |
| Relevant Legislation, Standards and Guidance .....                              | 3  |
| Action.....                                                                     | 4  |
| Background.....                                                                 | 5  |
| Other Relevant Inspection Guides .....                                          | 5  |
| Specialist Advice.....                                                          | 6  |
| Organisation.....                                                               | 6  |
| Recording & Reporting.....                                                      | 7  |
| Environmental Releases .....                                                    | 7  |
| Appendix 1 - Inspection Approach .....                                          | 8  |
| Appendix 2 – Success Criteria .....                                             | 12 |
| Appendix 3 – Application of the EMM and Duty Holder Performance Assessment..... | 19 |

## **Summary**

This Inspection Guide (IG) outlines an approach to the inspection of duty holders arrangements with respect to well testing and the key areas that inspectors should consider when inspecting this topic. It also sets out the criteria for satisfactory and unsatisfactory performance factors against which duty holder performance will be rated. Reference is made to technical standards and guidance that inspectors will use to form an opinion of legal compliance.

## **Introduction**

The purpose of this inspection guide is to provide information and guidance to OMAR inspectors to support the delivery of consistent and effective inspection of duty holder arrangements to comply with these well test guidelines.

This Inspection Guide highlights key areas for inspection and provides a framework against which inspectors can judge compliance, assign performance ratings and determine what enforcement action should be taken with respect to legislative breaches that may be found.

## **Relevant Legislation, Standards and Guidance**

### **Legislation**

- Health and Safety at Work etc. Act 1974, Sections 2, 3 and 6.
- Lifting Operations and Lifting Equipment Regulations 1998 (LOLER), Regulations 4, 5, 6, 7, 8 and 9.
- Management of Health and Safety at Work Regulations 1999, Regulations 3 and 5.  
Offshore Installations (Prevention of Fire and Explosion, and Emergency Response) Regulations 1995, Regulations 4, 5, 9, 10 and 19.
- Provision and Use of Work Equipment Regulations 1998, Regulations 8, 9 and 23.
- Work at Height Regulations 2005, Regulation 8.

### **Technical Standards**

Reference should be made to the latest version of the standards identified below:

- API Standard 520 Part I and II for Sizing, Selection and Installation of Pressure-relieving devices.
- API Standard 521 Pressure-relieving and Depressurizing Systems.
- API Standard 526 Flanged Steel Pressure Relief Valves
- API Standard 537 Flare Details for Petroleum, Petrochemical and Natural Gas Industries

- API Standard 2000 Venting Atmospheric and Low-pressure Storage Tanks.
- API RP 14C Recommended Practice for Analysis, Design, Installation, And Testing of Basic Surface Safety Systems for Offshore Production Platforms.
- API RP 14E Recommended Practice for Design and Installation of Offshore Production Platform Piping Systems.
- API RP 505 Recommended Practice for Classification of Locations for Electrical Installations at Petroleum Facilities Classified as Zone 0, Zone 1, and Zone 2.
- API Spec 12J Specification for Oil and Gas Separators.
- IEC 61508 Functional safety of electrical/ electronic/programmable electronic safety related systems.
- IEC 61511 Functional safety – Safety instrumented systems for the process industry sector.
- ASME Section VIII Div. 1 and 2 – boiler and pressure vessel code – VIII, pressure vessels.
- PD 5500 – Specification for unfired, fusion welded pressure vessels.
- NORSOK D-007 – Well testing system.
- BS EN ISO 14122 Part 2 Working Platforms and Walkways.

## **Industry Publications**

Reference should be made to the latest version of the industry publications identified below:

- Energy Institute – Guidelines for the design, installation and management of small-bore tubing assemblies.
- Energy Institute – Guidelines for the management of flexible hose assemblies.
- Energy Institute – Guidance on safe plant reinstatement.
- EI 15 (formerly referred to as IP 15) for area classification code for installations handling flammable fluids.
- International Association of Drilling Contractors (IADC) – Guidance on the management of third party competence for safety critical positions offshore.

## **Relevant HSE Guidance**

- HSG48 Reducing Error and Influencing Behaviour
- HSG253 Safe Isolation and Re-instatement of Plant.

## **Action**

Inspectors should review relevant documentation within the IG prior to the installation visit and test compliance during the visit against the success criteria identified in Appendix 2.

Inspection of this topic should include both an inspection of the areas under the direct responsibility of the duty holder but also take into consideration the responsibilities of the other stakeholders involved in well testing. Inspection approaches are outlined in Appendix 1.

By the conclusion of the inspection, it should be possible to:

- Assess Duty Holder responses against the identified success criteria.
- Identify any deficiencies in the management of well testing activities that are not in line with current legislation, technical standards and good practice.
- Identify enforcement action required to achieve compliance with legislation, technical standards and good practice.

### ***Background***

Well testing is a high hazard activity. The primary concern is an ignited hydrocarbon release following a loss of containment event. The well test system should be designed to protect personnel, the offshore installation and the environment by preventing, detecting and responding to any hazardous situation that could potentially arise during the testing or production of the well. This guide will ensure that inspection of well testing activities is conducted in a consistent manner.

### ***Other Relevant Inspection Guides***

- **Control of Work**  
This IG covers Hazard Identification and Risk Assessment (HIRA) and Permit to Work (PTW) arrangement.
- **Management of Human Factors**  
This IG covers how Human Factors is accounted for in the assessment and management of major accidents. It includes requirements for analysis of Safety and Environmentally Critical Tasks (SECTs), competence management, fatigue management, communications, including handovers and safe staffing levels.
- **Loss of Containment**  
This IG covers a number of topics with requirements to prevent loss of containment which include process plant design, hazard identification and operation within safe limits.
- **Noise and Vibration**  
This IG covers arrangements for managing health risks associated with exposure to noise.
- **Relief, Blowdown, Vent and Flare Systems**

This IG covers requirements for the safe design and operation of systems used to prevent exceeding design limits and safely remove process fluids to either prevent or mitigate a LOC event.

- **Safe Isolation and Reinstatement of Plant**

This IG covers arrangements for safe isolation and reinstatement of plant required to prevent a loss of containment event during and following intrusive maintenance and where required for other services.

- **Well Control and Well Integrity**

These IGs cover the arrangements for operational well control during drilling, testing, completion, other well intervention or maintenance/repair operations and during operation in order to prevent an uncontrolled release of reservoir hydrocarbons.

### ***Specialist Advice***

Process Engineering are the custodians of this IG and will normally undertake inspection of well testing activities. Where Process Engineering are not involved in the inspection, specialist advice should be sought with regards any deficiencies identified during the inspection when considering enforcement action or where compliance against the success criteria is unclear.

### ***Organisation***

#### **Targeting**

Well testing is a high hazard activity and should be inspected where it is known that the activity is going to be conducted.

#### **Timing**

Due to the nature of well testing, inspection cannot form part of the standard Intervention Planning process and is on an opportune basis. Inspection of this area should therefore be reviewed on a risk basis once the date of the activity is known versus other ongoing activities and available resources.

#### **Resourcing**

Well testing durations can extend or move based on drilling activity. Inspection teams should therefore remain flexible on timings and target mobilisation in advance of hydrocarbons flowing to surface.

### ***Recording & Reporting***

The duty holder performance ratings should be entered on the Inspection Rating (IRF) tab of the relevant installation Intervention Plan Service Order (IPSO). Findings should be recorded in the post inspection report and any associated letter or other enforcement action.

Where deficiencies are identified in relation to the other stakeholders involved in the activity, e.g. equipment suppliers, these findings should be recorded against the relevant company and not against the duty holder.

### ***Environmental Releases***

The well test equipment and associated utility systems shall be designed such that there is no release to sea. Any environmental release should be reported to OPRED in line with the normal reporting requirements.

The Competent Authority (CA) has agreed that where a system is required for a safety purpose, e.g. rig cooling system, then any environmental incident which is a direct result of the primary function of the safety system will be dealt with on a proportionate basis.

Environmental incidents will be dealt with in accordance with OPRED's Enforcement Policy.

Where OMAR Inspectors witness any environmental release arising from well testing activities, they should remind the Operator of their reporting obligations and notify OPRED.

## ***Appendix 1 - Inspection Approach***

Well testing may be conducted using temporary equipment or make use of permanent facilities installed on the installation. Any well tests using existing permanent facilities are outside the scope of this guide with this IG focused on temporary facilities only.

Well clean-ups using temporary, third party well testing equipment are considered to be well testing in the context of this IG with the only likely differentiator being the time taken to complete the activity.

Temporary well test facilities can be based on the production installation or on a non-production installation (such as jack-up rig or semi-submersible drilling facility). A typical well test 'spread' may have the following components;

- A surface test tree with production (flow) and well kill facilities.
- A dedicated production choke
- A 2 phase or 3 phase separator
- A heat exchanger (most likely a steam heater or indirect heater).
- Metering
- Flow lines and interconnecting pipework.
- Control valves and instrumentation
- Sample points
- Emergency shutdown valves
- Pumps for liquid transfer
- Chemical injection system
- Sand removal facilities (typically filters or hydrocyclones).
- Surge tanks
- Flare systems for hydrocarbon disposal
- Produced water treatment system

During a well test, the number of stakeholders and third parties involved can be complex.

Stakeholders may include:

- The rig and platform duty holders who have legal responsibility for equipment installed on their installation
- Well operator
- 3<sup>rd</sup> party equipment suppliers (well test equipment and cooling systems)

- Independent Verification Bodies (IVB) / Independent Competent Person (ICP)

The duty holder should be able to provide information on the relevant stakeholders involved and how they are being managed.

In the context of this IG and legislation, well test flare booms are considered to be a work platform / walkway where personnel may be required to be present in the course of the operation. They are not considered to be an emergency escape route.

### **Information Request**

The installation safety case should be consulted to confirm how the duty holder manages well testing equipment and that well testing has been identified as a Major Accident Hazard (MAH).

Prior to any inspection, the documents / information listed below should be requested as a minimum. Note that some documents will be prepared by other stakeholders however all requests should be made prior to the inspection via the duty holder for the installation.

- Basis of design for the well test equipment including standards and guidance used.
- Piping and Instrumentation Diagrams (P&IDs) of the proposed well test equipment
- Layout drawings for all equipment items including fire and gas detection and other protection systems (deluge etc.)
- Hazardous area drawings
- Reports or outputs from any process safety related studies (HAZID, HAZOP, SIL/LOPA, Fire and Explosion Analysis etc.) including any actions generated and evidence of close out
- Flare radiation and gas dispersion studies where hydrocarbons will be flared or vented
- Documentation / outputs of additional work used to ensure well test designs are fit for purpose (e.g. such as flare simulation modelling, IVB reviews etc.)
- Any check lists (blank) used to support well testing activities and how these are used
- The procedure for management of temporary equipment
- Well test procedure
- Rig cooling system basis of design and operational procedures
- Noise impact assessment
- Sand management and integrity monitoring (where appropriate)
- Method statements for installation and assembly of pipework and equipment and leak testing of the facilities prior to introducing hydrocarbons

- Isolation design philosophy showing compliance with HSG253
- Verification scheme for supply, design and use of well testing equipment

### **Onshore inspection**

The onshore inspection and documentation review should focus on ensuring that the well test design is fit for purpose. The suitability of the design should be assessed against the success criteria identified in Appendix 2.

The following stakeholders should be present at the onshore inspection:

- Installation duty holder
- Well operator
- 3<sup>rd</sup> party equipment suppliers (well test provider and rig cooling provider)
- IVB / ICP

### **Offshore inspection**

The offshore visit should be used to confirm that the risk control measures are in place, and the key aspects of the well test design are incorporated. It will involve conversations with the individuals identified below as a minimum.

- Offshore Installation Manager (OIM)
- Well operator's senior supervisor (e.g. the drilling supervisor (company man) or completions supervisor / well test supervisor)
- Drilling contractor senior toolpusher
- Individual accountable for management of 3<sup>rd</sup> party equipment
- Well test supervisor
- Well test personnel
- Rig cooling system operator

The offshore visit should cover the following areas:

- Equipment rig-up, installation and commissioning in accordance with relevant design drawings, procedures and method statements
- Leak testing and / or service testing of well test equipment
- Well test operating procedures and weather limitations for flaring
- Verification of well test equipment and associated certification
- Competency of well test personnel
- Temperature and noise monitoring arrangements during well testing

- Emergency response and rescue arrangements

## **Appendix 2 – Success Criteria**

The following success criteria should be considered to assess compliance. Inspectors should use their professional judgement on which aspects to cover onshore versus offshore.

### **Management of Well Testing Activity**

- Well testing is identified as an MAH and is conducted in line with the arrangements outlined in the safety case.
- Responsibilities and accountabilities for the different stakeholders are clearly defined such that each organisation understands their responsibility for conducting the operation safely.
- Well operator has prepared a Basis of Design (BOD) or similar, e.g. equipment specification, which clearly defines the requirements of the well test equipment and any support services. This includes the required process conditions and any design standards to be used.

### **Equipment Design**

- Well test equipment has been designed / constructed in accordance with recognised industry good practice and engineering standards or there is a demonstration that equivalent standards have been used.
- Well test equipment has been designed for the worst-case conditions in terms of pressure, temperature, flowrate and fluid type (considering issues such as solids, composition and contaminants). As a minimum, all equipment upstream of primary isolation point is fully rated for the maximum Closed-in Tubing Head Pressure (CITHP) of the well.
- High pressure / low pressure (HP/ LP) interfaces are minimised wherever possible via use of suitably rated equipment. Where this is not practicable then HP / LP interfaces are clearly identified and are protected via suitable arrangements, e.g. suitably sized relief valves, bursting discs etc.
- Isolation arrangements are in accordance with HSG253 particularly where breaking of containment is required as part of the well testing, e.g. sand accumulators, and all isolation points can be integrity tested.

### **Control and Shutdown**

- Well test equipment is provided with suitable instrumentation to allow automatic control, monitoring and shutdown of main process equipment. Instrumentation is provided for pressure, temperature and level monitoring with the device types and locations suitable based on the intended service. Back-up local indication is also provided where deemed necessary.

- Instrumented protective systems, e.g. trips, have been identified, selected and designed using recognised industry practice. NB: IEC 61508 / 61511 or API RP 14C are both acceptable standards considering the temporary nature of well test equipment.
- Emergency shutdown valves (ESDV) are provided at appropriate locations and can be remotely activated. ESDV location and number should be based on minimising the potential inventory in the event of a loss of containment with distance between first well isolation point (valve) and ESDV minimised.
- Well test equipment can be shutdown remotely via the installation's ESD / F&G system or, where this is not practicable, established procedures are in place which detail the required emergency response actions following loss of hydrocarbon containment from the well test package or for other installation emergencies.
- MAC points and / or shutdown push buttons are provided at appropriate locations in the vicinity of the well test equipment and as a minimum at emergency escape routes from well test area. MAC points and / or shutdown push buttons initiate automatic isolation of well test equipment.

### **Safety Studies / Risk Assessments**

- HAZOP, or equivalent structured process safety study has been completed, and all actions closed out prior to commencement of well testing. Any open actions are of low risk and do not affect the safe operation of the equipment or prevent the operation from commencing.
- Gas dispersion and flare radiation studies have been completed with clear procedures in place for operation of flare booms considering potential wind directions and dispersion of unignited gas clouds. Gas dispersion studies for relief lines venting directly to atmosphere have been carried out.
- Flare radiation study confirms that no area of the installation is exposed to thermal radiation levels in excess of the recommended personal exposure limits or where this may occur that suitable engineered protection is in place, i.e., rig cooling system.
- Risk assessment for noise exposure has been conducted with areas of potentially high noise, and those individuals required to work in those areas for extended periods of time, identified. Noise levels regularly monitored using calibrated equipment and hearing protection rules in place. NB: Suitability of risk assessment and equipment used for noise monitoring should be discussed with Industrial Hygiene specialists. Refer to Noise and Vibration IG for more detail.
- Lifting of equipment is planned in accordance with LOLER such that risks are eliminated or adequately controlled.

### **Hazardous Area Classifications**

- Installation hazardous area drawings identify the well testing area or have been updated to reflect location of temporary equipment. Hazardous area classification is a minimum of Zone 2 for well testing equipment with Zone 0 or Zone 1 areas restricted to flare or local vents.
- Local vents are minimised with hydrocarbon discharges routed to the flare boom and burners. Where local vents are required then the discharge of these are routed to safe locations, e.g. underdeck. Any local vents are equipped with flame arrestors or other alternative arrangements in place to prevent flame propagation.
- All equipment is certified for use in hazardous areas with all relevant certification in place. Handheld monitoring devices, e.g. temperature guns, FLIR cameras etc. are ATEX rated, or their use controlled in accordance with the installation Control of Work (CoW) procedures.

## **Gas Detection**

- Fire and gas mapping studies have been carried out with well test equipment located in areas where adequate fire and gas detection is provided or inadequate fixed gas detection is supplemented by temporary portable gas detection arrangements, e.g. Daleks. Temporary gas detection is connected into the installation F&G system where possible or alternative audible alarms and emergency response procedures are in place.
- Toxic gas detection is provided where required with emergency response procedures and additional emergency equipment, e.g. breathing apparatus, in place where required.

## **Flare Booms**

- Independent flare booms are provided on both sides of the installation with operating procedures in place identifying which boom is to be used depending on prevailing weather conditions.
- Flare booms have been installed in accordance with rigging plans with no evidence of contact between the structure and support wires. Booms also exhibit no evidence of rotation from the horizontal plane, i.e. walkways remain level such that they do not pose a risk to persons walking on them.
- Boom walkways are kept clear with all pipework and utility hoses adequately secured to the structure such that they do not impinge on the walkway and introduce personal injury hazards such as slips / trips and falls.
- Flare boom access points at the installation edge are kept clear of obstructions or where pipework impinges on access point then suitable alternative arrangements, e.g. hop-up scaffold, are provided.
- Flare booms and any access arrangements are designed and installed such that they do not give rise to a risk of fall from height or require personnel to be above the height of guard rails.

- Flare booms include intermediate guard rails or other suitable means of protection as required to prevent the fall of any of person as required by Work at Height regulations. NB: For construction equipment, the Work at Height regulations require a guard rail (handrail) height at a minimum of 950mm from the walkway and intermediate guard rails located such that no gap greater than 470mm exists are recommended.
- Flare booms are designed such that they are of sufficient dimensions to allow safe passage of persons and the use of any work equipment. NB: While not directly applicable to flare booms, BS EN ISO 14122 provides guidance on dimensions for work platforms. It recommends a minimum clear width of 800mm but allows reduction to 600mm where access is infrequent or the walkway is occasionally used (flare booms are considered to meet this definition). Installed pipework should not reduce the walkway width below 500mm.
- Access / egress to the flare booms is managed under the installation CoW system and is restricted to essential personnel only. Additional precautions, such as use of a watch person, effective communications (e.g. radios) and position of and rescue via the standby vessel, should be considered.
- Utility equipment and rigging arrangements are designed such that they do not prevent free passage of persons along the length of the boom or introduce the potential for musculoskeletal injuries. Where obstruction of the walkway cannot be avoided, e.g. due to location / height of king post, the duty holder has taken all reasonable measures to reduce the risks to ALARP and rescue plans have taken any obstruction into consideration.

## **Rig Cooling Systems**

- Cooling systems are designed to prevent thermal radiation levels exceeding defined limits which could cause structural or SECE damage or injury to personnel.
- Rig cooling systems are oriented such that they are directed outboard towards the flame centre and that they afford protection to all parts of the structure. The structure includes the flare boom and all associated support wires and anchor points.
- Duty holder can demonstrate that where support wires and anchor points are not protected by the rig cooling system that they are constructed of materials capable of withstanding the worst-case temperature due to thermal radiation from the flare such that it does not pose a risk to the integrity of the support arrangements.
- Temperature monitoring arrangements are in place with it demonstrated that no parts of the installation are being exposed to temperatures in excess of their design limits. Source of temperature limits are identified with operational guidance stating actions to be taken in the event of limits being approached / exceeded or issues with the rig cooling system, i.e. reduction in flare rate or suspension of well test.

- Cooling system performance is continuously monitored and recorded.

## **Emergency Response Plans**

- Rescue plans are in place and cover both the boom installation / removal and access / egress during well testing when all pipework and utility systems are installed. The duty holder can demonstrate that the rescue plans are achievable in practice.
- Emergency response procedures are in place which clearly outline the actions to be taken in the event of a loss of containment from the well test equipment or any other installation emergency during well testing. Response plans include actions to be taken in the event of activation of any temporary gas detection.

## **Rig-up, Installation and Pre-operational Checks**

- Equipment has been installed in accordance with layout drawings and P&IDs. Line walks confirm accuracy of drawings or red-line mark-ups showing the changes are available. It is good practice for one of the drilling contractor's senior supervisors, such as OIM or senior toolpusher, to be included in the pre-operational well test package line walk.
- Any modifications made to the equipment design or installation has been assessed and approved as part of a management of change process, including that used by the drilling rig duty holder for changes to well test equipment on their facility.
- Temporary pipework routings are such that they do not introduce any personal injury risks and are kept clear of emergency escape routes or, where this is not possible, alternative arrangements are in place, e.g. scaffolding, step-overs etc.
- Temporary pipework is suitably rated, adequately supported and restrained with no evidence of excessive unsupported spans.
- Flexible hoses use in hydrocarbon service is minimised with it demonstrated why there are no other practicable options and ideally only a single flexible connection between the well and the test equipment.
- Flexible hose length is minimised and is suitably rated for pressure, temperature and velocity. Flexible hose is installed such that its minimum bend radius is not exceeded, that it is adequately supported and is not subject to undue stresses. Further detail can be found in the Loss of Containment IG.
- Small bore tubing (SBT) is designed and installed in accordance with recognised guidance. Further detail can be found in the Loss of Containment IG.
- All sections of the well test equipment have been leak tested to the correct test pressure using an appropriate medium with test procedures and records available for review. Where leak testing is not possible, e.g. flare lines, then suitable alternative arrangements are in place for

demonstrating joint integrity, e.g. 2<sup>nd</sup> person checks, service testing etc. Further detail can be found in the SIRP IG.

- Functionality of safety systems (instrumentation and valves) has been proven prior to the introduction of hydrocarbons with evidence of device calibration. Pressure relief valves all have in-date certification.
- All equipment is clearly marked / tagged to aid identification during operation.

## **Verification**

- Installation duty holder has appointed an IVB / ICP and demonstrated that they have been involved in verification of the design and equipment installation offshore.
- Duty holder can demonstrate that they have processes in place for receipt of equipment to the installation and ensuring that all verification checks have been completed in accordance with the relevant Performance Standards.
- IVB / ICP can demonstrate their verification protocols and provide evidence of all checks which have been completed.

## **Competency of Personnel**

- Duty holder has arrangements in place for the review / oversight of the competency of 3<sup>rd</sup> party personnel involved in the well test. This should include interface with the well operator who can assist by providing audits or reviews of the well test contractor's competency management system, and review of the well test crew competency.
- Well test crew comprises a defined and sufficient number of persons appropriate for the task duration including for 24-hour continuously manned operation. Sufficient supervision is provided and where trainee operators are used, this is supported by an appropriate number of competent operators. Trainees are not left unsupervised at any stage of the operation.
- Well test company can demonstrate that their crews are suitably trained and are competent. Competency management systems are in place with all mandatory training and assessments completed or any gaps covered by other members of the work party to allow for trainees. Further detail can be found in the Loss of Containment IG.
- Personnel are capable of describing the equipment in use, safe operating limits and response to deviations, operational procedures to be followed and actions to take in the event of a loss of containment or platform emergency. Individuals are also capable of identifying the location of key safety equipment such as portable gas detectors, emergency shutdown push buttons etc.

## **Operation**

- Where solids or sand loading is a potential, pipework thickness checks are being conducted at identified 'hot spots', e.g. pipework bends.
- Regular line walks and spot checks of equipment are being conducted particularly during tests to confirm that there has been no displacement, rotation or disengagement of pipework and no evidence of loss of containment. Identification of pipework rotation / disengagement can be aided by marking of pipework at installation phase.
- Remote monitoring, such as via cameras, is used where available and identified as part of the risk assessment.
- Sampling of process fluids is conducted in a safe manner via approved permit in accordance with CoW system. Equipment used for sampling is fit for purpose and appropriate ignition controls are in place. Further detail can be found in the Loss of Containment IG.
- Any deviations from operating procedures or work instructions are clearly identified and have been reviewed, risk assessed and approved by competent persons including onshore personnel as necessary.

### Appendix 3 – Application of the EMM and Duty Holder Performance Assessment

When inspecting well testing, duty holder compliance is to be assessed against the relevant success criteria. The success criteria have been determined from specific regulatory requirements, defined standards, established standards or interpretative standards.

This assessment will determine the: EMM Risk Gap, the associated topic performance score together with the Initial Enforcement Expectation as shown in the table below.

The actual enforcement may differ from that consistent with the recorded topic score depending on duty holder and strategic factors. However, should this occur then the relevant duty holder and strategic factors should be identified in the inspection report.

#### The Topic Score recorded on COIN must be consistent with the Initial Enforcement Expectation.

Further guidance can be found at: <https://www.hse.gov.uk/enforce/assets/docs/emm.pdf>.

| EMM RISK GAP                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| EXTREME                                                                                                                                                                                                                                                                               | SUBSTANTIAL                                                                                                                                                                                                                         | MODERATE                                                                                                                                                                                                                                                                                                                   | NOMINAL                                                                                                                                                                                                                                                                                                 | NONE                                                                                                                                                                                                                                                                                                                 | NONE                                                                                                                                                                                                                                                                                                   |
| TOPIC PERFORMANCE SCORE                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                        |
| 60                                                                                                                                                                                                                                                                                    | 50                                                                                                                                                                                                                                  | 40                                                                                                                                                                                                                                                                                                                         | 30                                                                                                                                                                                                                                                                                                      | 20                                                                                                                                                                                                                                                                                                                   | 10                                                                                                                                                                                                                                                                                                     |
| Unacceptable                                                                                                                                                                                                                                                                          | Very Poor                                                                                                                                                                                                                           | Poor                                                                                                                                                                                                                                                                                                                       | Broadly Compliant                                                                                                                                                                                                                                                                                       | Fully Compliant                                                                                                                                                                                                                                                                                                      | Exemplary                                                                                                                                                                                                                                                                                              |
| Unacceptably far below relevant minimum legal requirements.<br><br>Most success criteria are not met.<br><br>Degree of non-compliance extreme and widespread.<br><br>Failure to recognise issues, their significance, and to demonstrate adequate commitment to take remedial action. | Substantially below the relevant minimum legal requirements.<br><br>Many success criteria are not fully met.<br><br>Degree of non-compliance substantial. Failures not recognised, with limited commitment to take remedial action. | Significantly below the relevant minimum legal requirements.<br><br>Several success criteria are not fully met.<br><br>Degree of non-compliance significant.<br><br>Limited recognition of the essential relevant components of effective health and safety management, but demonstrate commitment to take remedial action | Meets most of the relevant minimum legal requirements.<br><br>Most success criteria are fully met.<br><br>Degree of non-compliance minor and easily remedied.<br><br>Management recognise essential relevant components of effective health and safety management, and commitment to improve standards. | Meets the relevant minimum legal requirements.<br><br>All success criteria are fully met.<br><br>Management competent and able to demonstrate adequate identification of the principal risks, implementation of the necessary control measures, confirmation that these are used effectively; and subject to review. | Exceeds the relevant minimal legal requirements.<br><br>All success criteria are fully met.<br><br>Management competent, enthusiastic, and proactive in devising and implementing effective safety management system to 'good practice' or above standard. Actively seek to further improve standards. |
| EMM INITIAL ENFORCEMENT EXPECTATION                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                        |
| Prosecution / Enforcement Notice.                                                                                                                                                                                                                                                     | Enforcement Notice / Letter.                                                                                                                                                                                                        | Enforcement Notice / Letter.                                                                                                                                                                                                                                                                                               | Letter / Verbal warning.                                                                                                                                                                                                                                                                                | None.                                                                                                                                                                                                                                                                                                                | None.                                                                                                                                                                                                                                                                                                  |

It should be noted that:

- **the recorded score should reflect the most significant compliance gap identified** relevant to the Inspection Guide.
- the Inspection Guide and hence the allocated scores may not cover all the matters that were considered during the intervention.
- the intervention may not necessarily have used every part of the Inspection Guide – consequently the score only reflects what was inspected. **The inspection report should make it clear what aspects of the Inspection Guide the duty holder has been scored against** (or it is clearly identifiable by a letter item).
- where the score only relates to limited aspect of the Inspection Guide then consideration should be given to consulting the IG owner before finalising the score.
- proposed inspection scores should be reviewed/discussed by the full inspection team before finalising.
- the impact of cumulative risk should be considered when scoring. For example, two or three substantive scores of '30' will point strongly to an overall score of '40'. There is currently no mathematical or other systematic process for doing this and inspectors must therefore use their judgement to allocate an appropriate score that best represents the overall inspection findings against this IG.
- the allocated performance score only reflects regulatory judgements about a duty holder's degree of compliance at a particular point in time.

### **Use of performance scores**

HSE uses the performance scores as one of the many inputs to prioritise and plan future regulatory interventions. Prioritising intervention's is fundamental to ensuring HSE delivers its major hazards regulatory strategy whilst supporting businesses and the GB economy. HSE aims to ensure that regulatory activity is proportionate to the risk to people taking account a duty holders performance in controlling risks. In general, this means the HSE will inspect major hazard installations and duty holders with relatively poorer risk management performance more frequently and in greater depth than lower hazard installations and duty holders where there is evidence of higher risk management performance.