The Offshore Marine Operations Inspection Guide

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Review History

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Target Audience: ED Specialist Inspectors

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Summary
This guidance outlines an approach to inspection of duty holder’s arrangements for marine operations, and the current key topic areas that inspectors should consider when inspecting this topic both on and offshore. It also sets out criteria for satisfactory and unsatisfactory performance factors against which the dutyholder performance will be rated for each of these areas. References are made to technical standards and guidance that inspectors will use to form opinion for legal compliance.

Regulation of marine operations is undertaken by the Maritime and Coastguard Agency (MCA), the Marine Accident Investigation Branch (MAIB), and HSE.

MCA is responsible for enforcing all merchant shipping regulations in respect of occupational health and safety, the safety of vessels, safe navigation and operation (including staffing levels and crew competency). Merchant shipping health and safety regulations extend to all those working on the ship, and any work activities undertaken on board.

MAIB is responsible for investigating accidents related to ships and crew in the territorial sea and involving UK registered vessels worldwide, to determine their circumstances and causes with the sole objective of preventing similar accidents in the future.

HSE leads on the regulation of activities taking place on, or under the control of the operator of:

- offshore installations involved in the exploration or production of oil or gas;
- offshore installations involved in gas importation and storage or in relation to underground coal gasification; and
- energy structures (wind or wave).

The content of this inspection guide has been determined to be within the jurisdiction of HSE.

Sometimes the jurisdiction of the HSE, MCA and MAIB can overlap. The HSE/MCA/MAIB Operational Working Agreement details the process followed to determine the correct regulatory authority.
NOTE - This guide does not address Evacuation, Escape and Rescue, or Aviation Operations, which also form part of the remit of ED3.3. These topics are subject of a separate Inspection Guide.

Introduction
The aim of this Inspection Guide (IG) is to provide information and guidance to offshore inspectors to support the delivery of consistent and effective marine operations inspections. It does this by highlighting current key areas to be covered during inspections, providing a framework for inspectors to judge compliance, assign performance ratings, and decide what enforcement action to take should they find legislative breaches. In doing so, it complements HSE’s Enforcement Policy Statement (EPS) and Enforcement Management Model (EMM).

This operational guidance outlines HSE’s current marine operations inspection practices undertaken offshore. The topic breaks down into six core areas as follows:

1. Marine Assurance
2. Collision Risk Management
3. Transfer of Cargo between Offshore Supply Vessels and Installations
4. Rig Moving
5. Walk-To-Work Operations
6. Emergency Response and Rescue (ERRV)

An overview of each of the above is provided in the appendices. This guidance is to promote a consistent approach to the inspection of the core sub topic of Marine Operations.

Relevant Legislation
Health and Safety At Work etc. Act 1974 (Application outside Great Britain) Order 2013 (AOGBO) applies the Health and Safety at Work etc. Act (HSWA) to offshore installations and any activity in connection with an offshore installation, or any activity which is immediately preparatory thereto from a vessel or in any other manner, other than towing the installation (see MAR Reg 4), or an ERRV.
Offshore installations and Pipeline Works (Management, and Administration) Regulations 1995 (MAR) adds some more detailed requirements for the management of offshore operations to HSWA. The AOGBO Order 2001 extended the definition of ‘offshore installation’ to include supplementary units which provide support services to offshore installations on the UK Continental Shelf (UKCS). As a result, the definition of ‘Offshore Installation’ contained in MAR was also amended.

- **Regulation 2** interprets a vessel, aircraft or hovercraft attendant on the installation as an “associated structure”.
- **Regulation 3** defines “installation” and provides guidance on when a marine vessel becomes, and ceases to be, an installation.
- **Regulation 4** requires application of MAR at all times other than when the installation is in transit. The installation is not considered in transit if it is at, or in the immediate vicinity of its first, a previous or its new working location.
- **Regulation 11** The duty holder must ensure that comprehensible written instructions are provided and marine operations procedures are observed. This must be brought to the attention of every person who is to do anything to which that part relates.
- **Regulation 14** the duty holder should collect and record meteorological and oceanographic information that relates to the motion of the offshore installation. This is to secure, among other things, safe marine operations on and near the installation.

**The Prevention of Fire, Explosion and Emergency Response Regulations 1995 (PFEER)** specifies the goals for the preventative and protective measures to manage fire and explosion, and to secure emergency response, and recognises that the responsibility to put into place measures necessary to achieve these goals is best placed with one person – the dutyholder.

- **Regulation 4** places a general duty on a duty holder to take appropriate measures with a view to protecting persons on the installation from fire and explosion; and to securing effective emergency response.
- **Regulation 5** requires the dutyholder to identify events which could give rise to a major accident and establish appropriate standards of performance to be attained.
- **Regulation 10** requires the duty holder to take appropriate measures with a view to detecting fire and other events which may require emergency response.
• **Regulation 12** requires the duty holder to take appropriate measures to be able to limit the impact of an emergency.

**Action**

Inspection of this topic should include not only the six core areas themselves but also an overview of the operator’s Marine Operations procedures to ensure a consistent and complete assessment of control measures.

There should be in place suitable Performance Standards, Verification Schemes and, where necessary, Written Schemes of Examination for the systems and equipment that falls within the scope of the Marine Operations topic.

Success criteria for each core inspection area are contained in the Appendices to this guide. In some instances, certain success criteria will not be applicable, and inspectors should make a judgement regarding which are relevant in each case. If success criteria are not met, inspectors should assess how serious the consequences of failure to comply could be. This will inform their decision making in terms of the performance ratings that they assign and the enforcement action they take.

When carrying out inspections covered by this guidance inspectors should:

- Check the key issues against their success criteria in Appendices 1 to 6;
- Use the generic performance descriptors in Appendix 7 to determine the appropriate performance rating, and the initial enforcement expectation to use alongside the EMM if appropriate.
- Consider how and when the issues raised during an inspection are to be closed out and recorded.

Where occupational health, safety and welfare concerns are encountered during an inspection, deal with such issues as a matter of routine and apply existing standards to determine what action to take in each case according to HSE’s EPS and EMM.
**Background**

The management of marine operations is a specialist subject that is often overlooked as a major accident hazard. A collision between a vessel and an installation has the potential to result in a major accident with a large number of casualties.

There is little oil and gas legislation that deals specifically with marine operations and the industry draws heavily on guidance documents and the expertise of marine personnel.

**Other relevant Inspection Guides**

- Inspection of Emergency Response
- Inspection of Offshore Aviation Operations

**Organisation**

**Targeting**

Inspections should be planned within the timescales set out by ED divisional management. Although inspections may be carried out at any installation it is particularly important to carry this out where there are known issues regarding marine operations. It is essential to ensure that duty holders are robust in their assessment of the implications of these factors, that suitable mitigations are in place, and that cumulative risk factors have been considered.

**Timing**

Inspectors should undertake Marine Operations inspections as part of the agreed ED offshore intervention plan, when intelligence indicates intervention is necessary or when investigation due to incident is required.

**Resources**

ED3.3 (Emergency Response, Marine Operations and Aviation Specialism) has overall ownership of the Guide and takes the topic lead on inspecting Marine Operations. Resource for the undertaking of Marine Operations interventions will come from ED3.3 discipline specialist inspectors supported by Inspection Management Team inspectors as appropriate.

**Recording and Reporting**

The dutyholder performance ratings should be entered on the Inspection Rating (IRF) Tab of the relevant installation Intervention Plan Service Order. Findings should be recorded in the post inspection report and letter.
Appendix 1 - Marine Assurance

Fundamental Requirement
The dutyholder should have in place suitable arrangements to ensure suitable vessels are selected for the intended operation. They should have in place arrangements to ensure all vessels meet minimum standards for safe operations and station keeping before engaging in offshore operations.

Success Criteria
The dutyholder should demonstrate that their vessel assurance policy is sufficiently robust to ensure that all vessels undergo a suitable assessment prior to commencing offshore operations, and the assessment is based on the specific activities to be undertaken. The assessment should cover all aspects of the operation including crew competence, condition of equipment, vessel operator safety management, and compliance with other marine rules, codes and practices. The marine assurance policy should include a process of regular audits and inspections of vessels throughout the period they are on charter to the dutyholder.

During combined operations it is not necessary for all dutyholders to inspect and audit vessels, this is usually undertaken by the charterer of the vessels. Our expectation is for the operator of any installation to have defined the minimum standard of vessel permissible at that installation, and have a process in place to ensure and verify the vessel meets that standard and will be operated in accordance with industry good practice and the standards set by the operator. However, in the case of a drilling unit or flotel operating at a fixed installation, for example, the operator of the mobile unit is not expected to duplicate the audits and inspections undertaken by the operator of the fixed installation, and vice versa. The results of the audits and inspection should be shared between both operators so that both are able to make an informed decision as to the suitability of the vessel.

For some operations, such as seismic survey flybys, it may not be practicable to perform the full suite of vessel audits and inspections. The vessel operator or survey company should provide sufficient information to assure the duty holder the vessel is in good condition and being operated in a safe manner.

Onshore
• Confirm the duty holder has a marine assurance process that, as a minimum, identifies the following:
  o The vessel is adequately maintained, and critical systems are verified as fit for purpose.
  o The number and competence of crew is appropriate for the operations to be undertaken.
  o Suitable and sufficient procedures are in place for the safe operation of the vessel and that these procedures are compatible with the operating policies of the duty holder.
  o The vessel has in place all Class, Flag and Port State certificates and surveys and the duty holder has a process for reviewing any issues raised by certifying authorities (Flag, Class, Port State).
  o The operating envelope of the vessel is suitable for the specific location of the installation in relation to station keeping and the likely meteorological and oceanic conditions.
  o The vessel meets any relevant performance standards.
• Does the process require the vessel to undergo a more detailed industry accepted inspection (commonly an OVID or CMID inspection) within the previous 12 months and were any findings properly addressed by the vessel operator?
• Does the process require the vessel to undergo an operation specific audit (commonly referred to as an ‘on-hire inspection’ or ‘suitability inspection’) by a competent person on behalf of the duty holder to confirm it meets minimum safety and station keeping standards, (mandatory and dutyholder specific standards) and is staffed by an experienced and competent crew?
• Does the dutyholder have a policy of reviewing the results of marine assurance audits and inspections for third party vessels operating with their 500m zones, such as those vessels operating under a proximity agreement, to ensure the vessel meets, and is being operated in accordance, with their own standards?
• For DP vessels, does the marine assurance process include a review of the ASOG/CAM to ensure it reflects the dutyholder expectations with regard to the manner in which the vessel will be operated?
• Does the assurance process include a review of vessel specific and vessel operator safety statistics?
• During the marine assurance process, was the operating displacements of the vessel considered against the installation maximum impact energy?
• For DP vessels, does the marine assurance process include a review of recent proving trials? Is there a system in place for managing category A findings?
• For DP vessels, does the marine assurance process include a review of the DP FMEA?

**Key Regulations**
HSWA Sections 2 and 3 – Require (as a minimum) that risks be eliminated SFAIRP (equivalent of ALARP)
SCR 2015 Reg 16(1)(d) and (e) - L154 Para 211

**Supporting Standards/ACoP or Guidance**
Guidelines for Offshore Marine Operations (GOMO)
Guidelines for Offshore Marine Operations UK Supplement
IMCA M103 - Guidelines for the design and operation of dynamically positioned vessels
IMCA M109 - A guide to DP-related documentation for DP vessels
IMCA M117 - The training and experience of key DP personnel
IMCA M116 - Guidance on failure modes and effects analysis (FMEA)
IMCA M182 International guidelines for the safe operation of dynamically positioned offshore supply vessels
IMCA M204 - Vessel assurance
OCIMF – Dynamic Positioning Assurance Framework
Appendix 2 - Collision Risk Management

Fundamental Requirement
The dutyholder should have in place suitable arrangements to detect a vessel on collision course with the installation at an adequate distance to intervene. The arrangements should include a means to identify and communicate with the vessel, which may include specific actions to be performed by the standby vessel. Equipment used to detect vessels should be considered safety critical.

The duty holder should also have in place suitable arrangements to monitor and control vessel activity inside the installation 500m zone.

Success Criteria
The dutyholder should have in place a dutyholder and installation specific Collision Risk Management (CRM) System to ensure the risk of collision has been adequately assessed and the equipment and systems in place to detect or prevent the collision are sufficient and are considered safety critical. The CRM system should include a means of verifying the performance of associated equipment and ensuring the equipment is maintained to the required standard.

Adequate monitoring and control of vessel activities within the installation 500m zone should include a means of ensuring the vessel is operated in accordance with dutyholder policy and procedures, and operations are only undertaken in suitable weather conditions.

Collision Risk Management System

Onshore
- Does the dutyholder have a Collision Risk Management System in place which:
  - Has assessed, and continues to assess, the probability of a vessel colliding with the installation and the consequences likely to result from such a collision?
  - Includes the means of identifying passing vessels which may collide with the installation in sufficient time to take appropriate action?
- Was the specification of the detection system based on location-specific factors such as traffic characteristics (e.g. speed, density, routes, etc.), warning time required by
installation, standby vessel availability, and foreseeable weather conditions, and has the limitations of the equipment selected been taken into account?

- Does the CRM cover the following key elements (as described in OGUK guidance Collision Risk Management Systems, Issue 2):
  - Include clear corporate policies
  - Demonstrates senior management commitment to effective collision risk management
  - Contains clearly understood responsibilities for implementing and maintaining the system
  - Include means of ensuring the competency of personnel involved in CRM

- Are the detection and assessment systems treated as safety critical and is there a means of monitoring performance of vessel detection systems?

- Has the dutyholder undertaken a location specific hazard identification and risk assessment for each of their installations?

- Can the dutyholder demonstrate that the alerting measures adopted to warn off an approaching vessel are likely to be effective, and that they are undertaken early enough to provide a realistic chance that the vessel can act to avoid a collision?

- Does the emergency response plan for the installation address the management of collision risk from passing vessels?

- Do the installation emergency procedures (for vessel collision) address the time needed for the installation to prepare for collision? Are there time-based performance standards?

- On installations where collision detection is performed by the ERRV is there a process for ensuring radar blind sectors are regularly covered, particularly during periods of close standby or ERRV value added services within the 500m zone?

- When collision detection is provided by the ERRV at shared installations can the ERRV cover the required range when located at the extremity of the shared location?

**Offshore**

- Do relevant offshore personnel understand the dutyholder collision risk and collision avoidance policies and procedures?

- Is the OIM kept informed of planned vessel activity within the installation 500m zone including duty holder managed vessels and third-party vessels?

- Can relevant persons on the installation describe industry guidance and good practice with regard to vessels manoeuvring within the 500m zone?
• How does the OIM ensure that DP reflectors are not inadvertently moved by installation personnel?

Control and Monitoring of Vessels Inside Installation 500m Zone

• Are appropriate communication systems and procedures in place for communication between the installation and vessels either operating within the 500m zone or encroaching within it?
• Has a clear process been used to identify all planned or scheduled in-field vessels that may pose a major accident hazard to the installation?
• Are vessels on passage to the installation monitored to ensure they are not on a direct collision course and any navigational waypoint is offset from the installation?
• Is there a means of monitoring speed and direction of vessels once they enter the 500m zone to ensure they are being manoeuvred in accordance with company instructions, industry guidance and good practice?
• Are checklists used as a control measure for the operation of attendant vessels and are the contents of the checklists understood by installation personnel?
• Do the control measures cover other manoeuvres inside 500m zone, such as a supply vessel manoeuvring between working faces without leaving the 500m zone?
• Are there adequate control measures to mitigate the risk of weather side working?
• Does the process include a procedure for verifying repairs or alterations made to vessels who have had to leave the 500m zone due to technical issues before the vessel is given permission to re-enter the 500m zone?
• Does the process require all vessels to be provided with written information specific to the installation (commonly referred to as an “installation data card”), and are the data cards maintained to accurately reflect the current status and condition of the installation sufficient to enable the master to plan a safe arrival, approach and operations at the installation?
• Does the dutyholder provide adequate instruction to the master on company specific safety and marine operation policies and information, including inter alia location of exposed risers, communication and reporting requirements, adverse weather policy and relevant requirements of the dutyholder marine operations manual to which the vessel must adhere?
• Is the master expressly instructed to operate the vessel in accordance with current industry guidance and good practice?
• For combined operations, has the 500m zone entry policies of all dutyholders been compared, the most vulnerable aspects of each installation been identified, and where
necessary the 500m zone entry procedure been amended to ensure it is suitable for the combined operation?

**Adverse Weather Working Policies**

**Onshore**

- In connection with marine operations around the installation, has the dutyholder ensured that a clear weather working policy has been established with respect to the cessation of marine operations in adverse weather, and that no undue pressure can be brought to bear on the master of the visiting vessel to start and/or continue operations if they consider it unsafe to do so?
- Does the adverse weather working policy cover all marine operations that are or may be undertaken at the installation?

**Offshore**

- Are personnel aware of the contents of the adverse weather working policy and is the policy followed?

**Key Regulations**

- PFEER Reg. 10 (a) and (b)
- PFEER Reg. 19 (a) and (b)

**Supporting Standards/ACoP or Guidance**

- Paragraph 123 of the PFEER Guidance refers to detection arrangements specific to certain types of incident.
- PFEER Reg.19 ACoP Section 258 refers to the need for performance standards.
- OGUK Guidelines for Ship / Installation Collision Avoidance
  - Collision Risk Management – Guidance on Enforcement SPC177
- Guidelines for Ship/Installation Collision Avoidance – OGUK/MSF
Appendix 3 - Transfer of Cargo Between Offshore Supply Vessels and Installations

Fundamental Requirement
The dutyholder should have in place suitable arrangements to ensure risk to personnel during transfer of all cargo types between attendant vessel and installation is ALARP.

Success Criteria
The dutyholder should demonstrate that the risks associated with cargo operations between an attendant vessel and the installation have been properly assessed and suitable mitigation is in place to ensure the risks are reduced so far as is reasonably practicable. Some aspects of cargo transfer, such as cargo hose management, will overlap with OPRED (BEIS).

- Has the activity been risk assessed and does the assessment include risk to personnel on the attendant vessel?
- Has the activity been planned such that there is sufficient empty deck space on the vessel for backload without the need to make intra-deck movements of cargo?
- Do the control measures in place include lines of communication, weather limitations, agreed stop points, day / night operations?
- Is there clear communication between installation and deck crew? This may be via the vessel bridge but in any event the deck crew must be clearly informed when it is safe to approach the crane hook.
- Does the control measure include a check for loose items and defective equipment prior to any load being lifted either from the installation or from the attendant vessel?
- Has the attendant vessel master been provided with a cargo manifest or similar before the first lift is backloaded to enable them to plan for hazardous cargo and heavy lift placement?
- Is there a process for inspecting and testing bulk transfer hoses and hose flotation devices?
- Does the transfer procedure include particular precautions for transfer of methanol, including no other simultaneous cargo operations and no transfer when there is risk of lightning strikes?

Key Regulations
HSWA S2 and 3
MAR Reg. 8
MHSWR Reg 11
Supporting Standards/ACoP or Guidance

MAR Reg 8 guidance paragraph 62 to 64 clearly describes the relationship between installation and attendant vessel.

Guidelines for Offshore Marine Operations (GOMO)
Guidelines for Offshore Marine Operations UK Supplement
Appendix 4 - Rig Moving

Fundamental Requirement

The dutyholder should have in place suitable arrangements to ensure a rig move operation can be performed in a safe and controlled manner with minimal risk to those involved.

Success Criteria

Dutyholders should demonstrate that rig move operations are planned and undertaken in a manner that ensures, so far as is reasonably practicable, the safety and welfare of those involved in the operation and those who may be affected by the undertaking.

Prior to the Rig Move

- Has the entire rig move operation been subject to an operation specific risk assessment, and was the risk assessment attended by people with suitable skills and knowledge?
- If the rig move is in deep water (>300m) or an area subject to high currents, has this been identified during the risk assessment and have sufficient measures been included in the procedures, such as cross track distances and actions, use of J-hooks or other load sharing arrangements?
- Has a satisfactory mooring analysis been prepared in accordance with national / industry requirements?
- Does the rig move procedure or scope of work include key trigger points for cessation of the operation, such as maximum sea states, reduced visibility, high or unexpected loads and technical faults?
- Does the rig move procedure or scope of work include key hold points such as recovery of secondary moorings, recovery of primary moorings, moving alongside another structure, and commencement of SIMOPS?
- Have all vessels involved in the operation been subject to the duty holder marine assurance process and did this include a calculation of anticipated stability requirements at every stage of the operation based on expected loads as described in the rig move procedure?

Throughout the Rig Move

- Has a pre-operation meeting been held on the installation, and was it attended by all relevant parties?
• Are the towmaster and marine rep roles performed by different persons independent of each other?
• Are changes to the procedure properly managed, and is the company management of change process followed?
• Are hold points properly observed?

**Key Regulations**
HSWA Sect 2 and 3
MAR Reg. 4 and 8
MHSWR Reg 11

**Supporting Standards/ACoP or Guidance**

**A Note on Rig Moving and HSWA 1974 AOGB Order**

During the investigation into the Bourbon Dolphin incident it was determined by HSE that anchor handling activities were considered a “connected activity” as the activities of the vessel were controlled and directed under an overall system of work managed on the rig, despite the fact the vessel was outside the installation 500m zone.

For this reason, the undertaking of running moorings for the installation was a “connected activity” in the following ways:

- Physical connection – the anchor handling vessel was physically linked to the installation by mooring chain and wire which imposed a load on the vessel and the installation. This load imposed associated risks which needed to be controlled.
- Hazard and risk connection – as well as a physical link, the AHV and installation were mutually connected by the potential for acts or omissions on-board one to create significant hazards to the other.
- Command and control connection – the AHV was connected to the installation by a regime under which instructions were issued from the installation to the AHVs about when and how tasks were to be done, courses to be followed and locations to be reached.
Appendix 5 - Walk-to-Work Operations

Fundamental Requirement
The dutyholder shall demonstrate an acceptable system of managing walk-to-work (W2W) operations such that they do not impede on existing emergency response arrangements and all additional risks are sufficiently managed to ALARP levels.

Success Criteria
The dutyholder should have sufficient, effective management systems in place to ensure the safe transfer of persons to and from the installation, including dealing with emergencies on the gangway. Dutyholders should take into account the size of the vessel being used compared to the structural integrity of the installation, as W2W vessels are often considerably larger than other vessels that may operate at the same location.

- Have the W2W vessels, gangways and all associated equipment been subject to mandatory approval and certification? Dutyholders should have a system to ensure approval and certification is in place prior to any offshore operations.
- Is the specialist W2W equipment only operated by competent personnel?
- Have the W2W operations been subject to risk assessment, and has a WTW procedure been written which includes all measure identified in the risk assessment? The procedure must clearly state the limitations of the operation.
- Does the risk assessment include emergencies that may occur on the gangway or rescue of persons from the gangway to the deck if the operation of the gangway fails?
- Dutyholders who wish to combine W2W and response and rescue on a single vessel must ensure the following:
  - The vessel must meet current response and rescue performance standards up to the maximum sea states in which the platform will be attended. In the case of non-standard vessels (such as windcats, purpose-built vessels or vessels significantly larger than regular ERRVs) the method of demonstrating performance standards in higher sea states using mathematical extrapolation of trials data must be based on sound mathematical principle.
  - Operations on an installation supported by W2W must be limited to weather windows throughout which the environmental limits of gangway operations are not exceeded.
  - Dutyholders may nominate the W2W vessel to cover some, but not all, ERRV duties. HSE requirements for W2W vessels covering overside work for example will be less
stringent than those for W2W vessels covering abandonment and helicopter ditching scenarios. In order to demonstrate W2W vessels are capable of covering overside work the following must be considered:

- Does the W2W operation impede capability to provide overside cover?
- Are other emergency scenarios such as abandonment and helicopter ditching covered by a different vessel?

- Dutyholders must include in their assessment the likelihood that the W2W vessel would not be able to approach and connect to the installation in the event of any of the major hazards being realised. This must include such things as the effects of reduced visibility due to smoke and the effects on the vessel of a gas release.

- Dutyholders must demonstrate that use of a WTW vessel as a means of evacuation does not unduly impact any measures already in place to prevent vessel / installation collisions or other major accident hazards. Such measures include, for example, approach to the installation at a safe speed and in a controlled manner, and use of automated position control systems and the risk of changing from one control method to another in close proximity to an installation.

- Dutyholders must demonstrate use of vessels which are not certified as ERRV have undergone a gap analyses against current industry standards to demonstrate the equipment and systems are equivalent to or better than existing ERRV standards.

**Key Regulations**

HSWA Sections 2 and 3 – Require (as a minimum) that risks be eliminated SFAIRP (equivalent of ALARP)

**Supporting Standards/ACoP or Guidance**

HSE OIS 1/2019 Consideration for Walk-to-Work and Multi-Operation Vessels – Regulatory Guidance

Appendix 6 – Multi-Role Emergency Response and Rescue Vessels (ERRV) Operations

Fundamental Requirement
The dutyholder should have in place suitable arrangements to provide a means of response and rescue of persons in the water (up to maximum installation POB), and facilities to provide care and medical treatment to survivors. Any other services provided by the ERRV, such as collision detection, tanker offload assist and cargo transfers, should not impede the ability of the vessel from performing its response and rescue role.

Success Criteria
Dutyholders should have adequate arrangements in place to ensure ERRV are properly crewed, equipped and meet the mandatory requirements for them to perform their role. Additional multi-purpose services provided by the ERRV should be managed and coordinated to ensure the operations are safe and do not impact on the primary role of the ERRV.

Rescue and Recovery
- Has the vessel been subject to the dutyholder marine assurance process, including full MCA ERRV certification?
- Has the vessel undergone Response and Rescue Validation trials within last 12 months? Were validation trials performed by both regular crews and were they location specific?
- If the ERRV is supporting more than one installation is there a suitable sharing agreement in place? The dutyholder must be able to demonstrate effective management of ERRV between installations and sharing arrangements must not impact response and rescue capabilities.

Value Added Service
- If the ERRV performs value added service role, such as tanker assist and cargo warehousing, is it able to perform its primary role at all times?
- If the ERRV is unable to perform its primary role are there arrangements in place to provide supplementary cover or restrict installation activities during these times?
- Are procedures in place, and has there been sufficient training, to ensure all additional activities are performed safely?

Key Regulations
PFEER Reg 17

**Supporting Standards/ACoP or Guidance**

The Emergency Response and Rescue Vessel Management Guidelines Issue 6
The Emergency Response and Rescue Vessel Survey Guidelines Issue 7
Appendix 7 - Application of EMM and Duty Holder Performance Assessment

When inspecting marine operations, the aspects considered need to be judged against the relevant success criteria.

These 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.

Note: actual enforcement may differ depending on local factors.

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<th>Extreme</th>
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<tr>
<td>TOPIC PERFORMANCE SCORE</td>
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<th>EMM Initial Enforcement Expectation</th>
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<td>Prosecution / Enforcement Notice</td>
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<td>Enforcement notice / Letter</td>
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Further guidance can be found at: http://www.hse.gov.uk/enforce/emm.pdf

It should be noted that:

- 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 allocated performance score only reflects regulatory judgements about a dutyholder’s degree of compliance at a particular point in time.
HSE uses the performances scores as one among many inputs to target, prioritise and plan regulatory interventions.