

Offshore Major Accident Hazards Advisory Committee		OMAHAC/MIN/2/2016	
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Exemptions:	None		

**Minutes of the Offshore Major Accident Hazards Advisory Committee
Meeting held on 1st December 2016 at Lord Cullen House, Aberdeen**

Present

Chair Chris Flint HSE, Secretariat Mike Readitt HSE, Dave Salmon HSE, David Balston BROA, John Bradshaw IMCA, Mick Borwell Oil & Gas UK, Derek Hart IADC, Les Linklater Step Change, Andrew Taylor BEIS, Tommy Campbell Unite, Paul Wilkins MCA, Jake Molloy RMT, Russell Breen HSE, Howard Harte HSE, Ashley Hynds, HSE, John Pirie, HSE, Rog Thomson HSE, Simon Rooks TYCO, Steve Southward TYCO

Apologies

Apologies had been received from Richard Benzie IMCA, Wendy Kennedy BEIS, Katrina Ross BROA, Gavin Sutherland IADC and Bryan Monson HSENI.

1. Introductions

- 1.1 The Chair welcomed everyone to this the second meeting of the Offshore Major Accident Hazards Advisory Committee (OMAHAC).

Outstanding Actions from the OMAHAC meeting 22nd March 2016

1.2 The following Actions were recorded:-

Action	Description	Status
1 Mar. 16	The Secretary to update the “Ways of Working” to record the Chair and Vice Chair will hold office for 2 years	Completed
2 Mar. 16	HSE to continue discussions with industry ‘ heli’ related working groups with a view to providing proposals for establishing a single working group and an appropriate mandate and terms of reference. Details to be presented at the Oct. 16 meeting	Superseded HSE and CAA support a single industry group to consider helicopter / heli deck issues and have agreed the CAA will now take this forward.
3 Mar. 16	The Secretary to arrange for the Competent Authority to update OMAHAC on its activities at future meetings.	Completed
4 Mar. 16	All members to obtain views from their constituent groups on possible initiatives to progress workforce engagement and on further or updated training on safety representatives, ready for Oct. 2016 meeting (now Dec. 16).	Completed - feedback taken as part of discussions with Agenda item 5
5 Mar. 16	HSE will prepare a discussion paper to outline current major accident awareness training, and the scope for enhancing it, the benefits and the potential issues for the industry. To be circulated to members in June 2016.	Completed Paper circulated to members on 20 th Oct.
6 Mar. 16	All members to review the major accident hazard training paper and establish views on what aspects of this OMAHAC should / can take forward as part of its future plan of work. To be discussed at the Oct. 16 meeting (now Dec. 16)	Completed feedback taken as part of discussions with Agenda item 5

Minutes from the OMAHAC meeting held on 22nd March 2016

1.3 The minutes were circulated to members on 14th April 16 and no comments were received, they were subsequently approved without change.

2. Active Fire Protection Systems - TYCO

- 2.1 This agenda item arose from the 'All Party Parliamentary Fire & Rescue Group working lunch meeting which HSE attended in October 2016, relating to the effective operation of deluge systems offshore. TYCO were subsequently invited to prepare a discussion paper highlighting for OMAHAC members the long standing issues associated with deluge systems. Simon Rooks (TYCO) presented the paper to the meeting - "*A Call to Review the Effectiveness of Offshore Deluge Systems*".
- 2.2 Simon advised the members that the paper focused on raising the awareness of the long term standing issues of corrosion, marine growth and blockages that had the capacity for affecting the effective operation of deluge systems. This was particularly important as deluge systems are classed as safety critical systems for fire suppression and preventing spread. He commented that research had identified a high percentage of failures in testing that was due predominantly to blockages.
- 2.3 OMAHAC were asked to:
- a) Commit resource to review and update current testing guidance to operators and develop an agreed move from wet to dry testing.
 - b) Commit resource to understand nozzle blockage prevention devices and to develop recommendation documentation for operators to work to.
 - c) Develop guidance for the design of new installations with consideration for the impact of the marine environment and the blockages it causes in deluge systems.
- 2.4 The Chair thanked Simon for the paper and invited comments from members to establish if they believed there was a generic issue with deluge systems that required further investigation. The Unions suggested that solutions for the safe and effective operation of deluge systems should come from the relevant service industry. Oil & Gas UK (O&GUK) and BROA agreed there were problems with deluge systems but the extent of these problems were not known. HSE confirmed that they were aware of concerns raised by verification bodies and Independent Competent Persons (ICP). Collectively members thought further investigation was required to establish the extent of the problem and O&GUK offered that it's Major Accident Hazard Management Forum could take this forward.

Action 1 Dec. 2016

O&GUK's Major Accident Hazard Management Forum set up a task group to establish the scale of the problems associated with offshore deluge systems, and report back to OMAHAC on its findings and possible solutions.

Action 2 Dec. 2016

HSE to report to the All Party Parliamentary Fire and Rescue Group confirming OMAHAC's discussions and the action being taken.

3. Operational versus asset integrity – managing the risk of major hydrocarbon releases

- 3.1 Ashley Hynds (HSE) presented his paper to the meeting. He reported that analysis of HCR data had shown an undeniable reduction of minor and significant releases attributed to the industry's and regulator's activities. However, there was no discernible trend for major releases. HSE's investigations over the last five years showed the majority of minor and significant HCRs had poor asset condition or hardware as the primary underlying cause, whereas the majority of major HCRs, had loss of operational control as the primary underlying cause. Analysis also discovered that operator's arrangements for self-assessment and assurance of the health of their major accident hazard barriers varied widely. Only the best self-assessment systems included the effective oversight of 'asset integrity' (hardware) and also 'operational integrity' (software). There was therefore a concern that the risk of major HCRs was not being fully addressed.
- 3.2 The chairman invited comments from members on the paper's findings and the recommendations proposed. Step Change advised that they had been looking at operational integrity in relation to HCRs and that their findings, lessons learned and guidance would be readily available to the industry in Spring 2017. O&GUK welcomed the opportunity to discuss with HSE whether operators are doing enough to ensure themselves of the health of their operational control barriers as part of their ongoing safety management system review mechanisms.
- 3.3 Jake Molloy (RMT) supported safety representatives being provided with the verification reports on their installation to better understand performance standards and the safety critical importance of asset integrity. HSE confirmed that it was currently reviewing its Inspection programme guidance and this will be shared with industry early in 2017 before introduction in April.

Action 3 Dec. 2016

HSE to share any further learnings arising from its recent analysis of HCRs, and determination of underlying causes, Dec 2016 with all parties

Action 4 Dec. 2016

HSE and O&GUK to discuss arrangements for ensuring the health of operational control barriers

Action 5 Dec. 2016

Step Change to review and update their HCR reduction toolkit and update their guidance as necessary.

Action 6 Dec. 2016

HSE to finalise its Inspection Programme guidance and share it with industry for comment before final publication in 2017.

4. The Offshore Safety Directive Regulator (OSDR) – The Competent Authority

- 4.1 Rog Thomson (HSE) provided members with an update on the Competent Authority's (CA) activities. The key points are summarised below:-

- The Competent Authority (CA) is known as the “Offshore Safety Directive Regulator” (OSDR), (HSE and the Dept. for Business, Energy and Industrial Strategy (BEIS) working in partnership).
- Northern Ireland has implemented parallel offshore legislation and a legally separate Competent Authority will cover their territorial waters but supported in practice by OSDR. A formal agreement for this support between HSE and HSENI is being progressed.
- All OSDR business framework processes are implemented and available online.
- The CA’s online portal is under development and scheduled for implementation in 2017.
- OSDR’s Intervention planning is underway for 2017 scheduled inspections.
- The OSDR acknowledges the difficulties industry has had to overcome with the Safety case transitional provisions and recognises their efforts to achieve the requirements (in some cases without having the legislation or guidance in place).

4.2 The IADC commented that the implementation of the safety case transitional provisions had been stressful for operators who submitted early cases, yet recognised that they had received good support from HSE and BEIS.

Action 7 Dec. 2016 The Secretary to circulate the OSDR presentation to members.

5. Recommended actions for improved effectiveness of major accident hazard management

5.1 Russell Breen (HSE) introduced this paper. He summarised for members the background on how the improvement of major accident hazard (MAH) awareness training was raised at OMAHAC (by the Department of Energy and Climate Change - now BEIS). Also, that in November 2015 verifiers had identified a need for greater MAH awareness training amongst those workers who could make a difference in preventing a major accident. The paper invited views on two proposals:

- a) Support the formation of a task group to review and enhance the effectiveness of MAH training requirements and arrangements that comprises O&GUK, OPITO and Step Change with Verifiers and the Competent Authority as informed and engage stakeholders; and
- b) To extend access to the existing O&GUK Assurance and Verification Network to the Verifiers and the Competent Authority (currently only open to Oil and Gas UK duty holder members).

5.2 Discussions confirmed the industry already had MAH awareness training currently available to offshore workers e.g. the four modules developed by OPITO, and the training developed by Step Change. However, members recognised there were potential improvements to be made in how the training is rolled out across the industry, the relevant / most appropriate target audience to receive the training, should the training be optional or mandatory and how its effectiveness is measured.

5.3 There was consensus that the key target audience for training should be middle management, i.e. those in a supervisory or operational management role. Jake Molloy said the it could be argued that safety representatives were better trained than managers (the Workforce Involvement Group chaired by HSE’s Dave Walker,

working with OPITO developed the training in a programme supported by OIAC, and subsequently Step Change and O&GUK), and such training should be rolled out to this group.

- 5.4 OMAHAC agreed that there was an issue with the up-take of the existing training and this needed to be addressed but the establishing of a specific task group to review the effectiveness of MAH training was not appropriate. OMAHAC also agreed that O&GUK's existing 'Assurance and Verification' network should be extended to include representatives of the Verification bodies and be tasked to consider the barriers preventing the take up of MAH training.

Action 8 Dec. 2016

Russell Breen and Melanie Taylor (HSE) to consider the Step Change MAH training and the OPITO modules to see if they remain relevant and report their findings to OMAHAC.

Action 9 Dec. 2016

O&GUK to draft terms of reference for an enhanced Assurance and Verification network group to review the barriers preventing the take up of MAH training and report back to OMAHAC

6. Cyber Security

- 6.1 John Pirie (HSE) presented a paper to raise awareness of the growing threat of cyber-attacks to the energy and utilities industries. He reported Cyber-attacks are on the rise and the scale and complexity of the attacks is developing. In the past, the majority of attacks were associated with Information Technology (IT) systems. However, recent trends show that Industrial Control Systems are increasingly being targeted. Offshore, nearly all new control and safety instrumented systems that are being installed are programmable and there is an increasing drive to interconnect Operational Control Systems with the IT systems and the internet.
- 6.2 OMAHAC were invited to discuss whether enough is being done by the regulator and or the industry on this subject, particularly:
- a) Should Step Change raise the importance with the workforce?
 - b) Should Oil & Gas UK, IADC, IMCA etc. be more proactive, such as developing more specific guidelines for each of their offshore sectors?
 - c) Are we learning the lessons from other industrial sectors?
 - d) Should cyber security incidents be reportable (they are not at the moment).
- 6.3 HSE reported that it is currently engaging with the industry to develop further guidance on cyber security. IADC reported they already had specific guidance in place. BROA stated any move towards the reporting of cyber security incidents would require careful definition and consideration on what would / should be reportable. O&GUK commented that the Centre for the Protection of National Infrastructure (CPNI) had provided them with security updates that identified the utilities and upstream oil and gas sector is considered 'low risk' at present. There

was also a feeling that a risk of cyber-attack is more likely to be from an accidental incident than from a deliberate attack.

Action 9 Dec. 2016 **All members to consult within their constituencies on the risk(s) to the industry from a cyber attack and report back to OMAHAC.**

Action 10 Dec. 2016 **John Pirie (HSE) and Les Linklater (Step Change) to publish an article in 'Tea Shack News' to highlight the issue of cyber attacks (to coincide with the publication of HSE's new guidance in 2017).**

6. Any other business

Helidecks

- 6.1 Step Change confirmed that the second meeting of the Helicopter Safety Leadership Group is due to take place early in 2017.

Hydrocarbon extraction in the EU (HBREF)

- 6.2 BROA asked for confirmation of the UK's position on the EU Commission's development of the HBREF. BEIS indicated they continued to be supportive of the view that the existing goal setting environmental measures in place should not be replaced by potentially prescriptive requirements.

Interim recommendations on the safe carriage of industrial personnel on vessels

- 6.3 MCA advised that IMO recently agreed a non-mandatory definition of industrial personnel which includes offshore workers being transported. A draft copy of MSC 418/97 will be circulated to members.

Participation at future meetings by Skype

- 6.4 MCA raised the possibility of joining future meetings by Skype. Members agreed that it would not be suitable for OMAHAC to hold meetings in this manner and that meetings should continue on a face-to-face basis.

Date of the next OMAHAC Meeting

- 6.5 The next meeting will be held in late April 2017 on a date to be agreed, at Lord Cullen House, Aberdeen.