

Offshore Major Accident Hazard Advisory Committee - Agenda

OGUK, Teams Meeting

09:30 – 12:00

Chair: Trevor Stapleton, OGUK

Attendees:

Name	Company	Name	Company
Chris Flint	HSE	Katherine Meffen	OGUK
Howard Harte	HSE	Margaret Fitzgerald	IMCA
Jake Molloy	RMT	Stuart Clow	IADC
Jim House	MCA	Steve Rae	SCiS
John Boland	UNITE	Trevor Stapleton	OGUK
Katrina Ross	BROA		

1. Introductions and call for AOAB

OGUK

TS welcomed attendees and requested that any AOAB items be raised during the attendees' introductions. OGUK added EERTAG governance to AOAB.
KR noted that BROA had one additional item relating to 500m zone exclusions, which they would raise during their update

2. Review of Actions and Minutes of Meeting

OGUK

- The group agreed that they had reviewed and approved the draft minutes as a true reflection of the December 2019 OMAHAC meeting.

• Action Review:

TS went through the open actions on the list and the group defined current status. Full action list will be shared with minutes.

Action – sharing information via OMAHAC. Currently, the Safety Alerts / Moments group, co-chaired by TS provides a single point of focus. SR requested that IADC / IMCA should automatically share these alerts through their own groups

It was proposed that the BSEE alerts shared with the OMAHAC membership by HSE could be directed to this group too.

KR noted that BROA don't have access to SCiS, although they do get info from members, MSF and IMCA.

Agreed to keep current arrangement for sharing of BSEE through OMAHAC list members, and these can also be shared via StepChange.

Action Completed

- Action – 2+1 issues with H&S Operators group. TS raised and highlighted the HSE concerns in that regard with the H&S Operators group. COVID has clearly impacted on this for the first 6 months of year but coming back into focus now.
CF – HSE still have a concern about this and will raise in PSG – HSE have no issue with night / day sharing, but reservations with same shift and 2 plus 1. Looking for documented feedback which TS will share.

Action updated – once feedback received, TS to meet with HSE to review.

- Action – IMCA position on cabin sharing. MF requested information from members, but not yet received.

Action updated – once feedback received, MF to set up separate meeting with HSE to review.

Feedback from members of unions – JB highlighted that union is still getting concern regarding sharing. JM – absolutely positive reaction to single occupancy. Improved quality of rest and sleep.

- Action – Human Factors Inspection guideline meeting. Productive meetings were held, comments taken on board.
Revised draft received yesterday, to be reviewed next week. IADC / BROA meeting on Monday at which an update will be given.
Expectation is that revised draft will be recirculated for comment and feedback in October.

Action closed “shared working draft with IMCA and BROA”

Action – ESR involvement in HCR prevention – confirmed through the MAH involvement.
Action closed.

3. Member Organisation Updates

All

- HSE
HSE attendance at the Pandemic Steering Group has been maintained since initiation, and they have held separate meetings with BROA and IADC.
Pandemic has been primary focus, including supporting the PSG and assisting industry to keep moving. Visits to offshore installations have resumed, and the intention is to be back on the original intervention plan by September.
Virtual inspections conducted have had a dual focus on COVID measures and management of MAH during the situation. The HSE have emphasised throughout that major hazard controls remain central, and continuing focus on the HCR prevention initiative will be key.

All administrations in the UK have an expectation that HSE will visibly support across all sectors of the economy as required. HSE are increasing resources to visit workplaces in areas where intelligence from Public Health bodies is that R is increasing. Also providing support where there are local outbreaks declared. Potential for ED personnel to be redeployed to assist with national effort, along with public health and police colleagues. CF advised that the planned Safety Case guidance update, which is intended to provide coherent and clear updated topic guides, had been delayed, and although now back on track, the potential remains for Energy Division personnel to be redeployed to assist with national efforts.

- **MCA**

JH noted that the MCA team is almost fully resourced, with LSA and Fire Safety leads in place. As with other public agencies, MCA is using mostly remote working, but coastguard operations are not affected.

MF asked what the current position on surveying of vessels was, following the original IMO recommendation to delay surveys. Are these begin conducted virtually?

JH confirmed that surveys have recommenced, with priority given to urgency / type of work. Changes to work practices to conform to COVID requirements but going quite well just now.

MF further request to clarify whether new ship / port protocols (the original purpose of the 6-month IMO recommendation was to permit this) have been developed and implemented?

JH confirmed during the meeting that MCA have returned to Survey and inspection on a risk-based approach based on vessel types. MIN622 & MIN623 have more information. Recognised Organisations (RO's) to continue to complete surveys on MCA's behalf overseas. MCA surveyors in the UK are focussing on the domestic fleet, attending UK domestic Cargo, Fishing and Code vessel. Domestic Passengers Vessels are being targeted for general inspections. Port-State-Control is being considered on a case by case risk-based approach with the situation being reviewed daily for opportunities for increased attendance as the GOV.UK COVID guidance / situation changes.

- **OPRED**

WK noted that OPRED moved to remote working on the 23rd March, and routine offshore visits have been paused. OPRED have continued to conduct remote regulatory interventions but are having to accommodate reduced working hours of personnel. Despite this, the team have maintained performance requirements dealing with applications / submissions and conducted remote inspections. OPRED are engaging in ongoing dialogue with duty holders to ensure sufficient competence and environmentally sound operations are maintained. Common area concern was to understand position of operators re: deferment of maintenance work and any potential impacts on environmental performance. Found that SECE maintenance kept up to date but wanted to understand non-critical equipment maintenance position and any potential impact on environmental performance.

Plan to return to offshore visits from September currently under discussion with the unions, health and safety and staff groups.

Positive results from testing emergency response remote arrangements including for SOSREP level events.

Litigation happening around environmental decisions, is taking resources from frontline activity.

OPRED have established a low oil price contingency team to monitor financial health of operators to ensure FR and decommissioning liabilities are met.

Ongoing work to improve OSDR intervention, and to reschedule postponed works from 2020.

MF noted that IMCA met with HSE ED in January in relation to a vessel required to put together a safety case for decommissioning. HSE felt that vessel was being used as an accommodation vessel. During discussion, new decommissioning guidelines were indicated. MF asked whether there was a timetable for publication.?

WK advised that the new guidance being worked is related to the Comparative Assessment following OSPAR process in 2019 and will not change operational fundamentals relating to conducting decommissioning activities.

WK offered to put MF in touch with decommissioning focal point if required.

TS asked whether any additional concerns are emerging from changing BREXIT situation. OPRED policy team are involved in the post-EU exit negotiations and impact on directives / regulations but not currently able to give an indication of where that is going to land. Key legislation they are monitoring would be atmospheric and chemicals.

CF noted that within HSE many personnel are now being moved back from pandemic and refocusing on post-EU exit. Obvious focus on chemicals regulation, as contingency plans were made for no-deal, which are now being reviewed.

Asked whether there was any indication of progress on the Offshore Safety Directive review from within the European Commission, WK advised that focus is understandably elsewhere, but indication is that there is an appetite to maintain UK participation.

KR noted that the domestic review of SCR 15 had been published and confirmed that BROA had had no word from European contacts within CoS.

- RMT

JM noted that COVID issues have been the focus in recent months, although these were beginning to drop off. Main workforce concern being raised with union currently is proposed return to cabin sharing.

In addition, NRB concerns resurfacing, along with specific issues related to maintenance and SECE.

Downturn has revived thoughts about skills retention, and ability to maintain competence during a period of redundancies. Unions have identified a requirement for delivering Connected Competence to bring measurable, definable, objective process for identifying competence, and plan to meet via SCiS to progress this.

Human factors also on the agenda with so many distractions right now. Economic worries, on top of pandemic. Workforce Engagement is crucial to allay concerns and refocus.

- UNITE

Similar focus. Initial concerns around COVID, noted that feedback from members has been that testing has been welcomed where introduced. Cabin sharing remains an

ongoing concern, along with the reduction in offshore numbers potentially impacting on delivery of maintenance activities.

Also, monitoring potential impact on workforce of cumulative impact of pandemic, redundancies and consultations on terms and conditions creating pressure.

TS checked that links with OGUK Workforce Engagement Manager are being maintained, which was confirmed.

- BROA

KR noted that BROA have been very engaged with IADC and OGUK on pandemic response, with BROA focus on vessel operations complementing the Pandemic Steering Group focus on offshore installations.

KR noted that some offshore energy workers were able to use seafarers' exemption to quarantine rules, and that designating key workers and ensuring that was recognised in quarantine exemptions had positive impact on managing mental health issues.

Apart from this, BROA activities have been on the decarbonising agenda, with a lot of movement to offshore renewables work and using hybrid fuels. Also reported their focus on security at ports.

KR also raised an item of AOAB:

Following security incident in Danish sector, question has been asked whether there is a legal basis for preventing individuals swimming in to 500m zone in line with the restriction on bringing vessels within 500m

CF noted that HSE presented to board last November on net zero and energy transition, including resourcing and gaps in legislation and guidance. Work has been delayed, but team looking at gaps in new energy model regulation / guidance / resourcing. Any specific areas can be raised with contact.

Action: CF to send contact details, and KR to raise so this can be followed up to check legal positions.

- IADC

SC advised concerns related to members entering Chapter 11 with serious impacts on all levels of employment including senior management expected.

SC shared info on low activity levels in UKCS, although noted that some rigs are coming out of stack to go on contract.

IADC currently liaising with Kuwait who are looking to invest in oil industry and facilitating OGA liaison with members – focus on challenges around decommissioning, and scale of opportunities in UKCS.

14-day quarantine still causing crewing problems, although has gone relatively quiet.

IADC members keen to do testing offshore, as costs of returning all personnel to shore for testing is prohibitive. Members currently planning to quarantine Cat C personnel offshore until results in.

Action: PSG to consider topic.

- IMCA

Participation in PSG has been very useful in the UKCS context. Internationally, observer IMCA has observer status at IMO and ICS groups which have made recommendations to governments, particularly regarding the ongoing issue with crew changes, and

recommending the facilitation of cross-border transport for seafarers. Also noted that not all personnel are recognised as seafarers. IMCA pushed the inclusion of all offshore energy workers (including onshore positions) in circular outlining the IMO twelve step protocol for international travel.

Severe disruption to travel is ongoing, with many personnel way beyond their contractual limits. This has raised concerns relating to whether this could breach required manning for P&I clubs and insurance. May lead to members being outside their insurance conditions.

MF also highlighted a concern re: divers who have had COVID and whether they have sustained lung damage.

JM noted that divers have raised concerns around some measures being taken by members of IMCA, will be writing in due course to formally address these.

- OGUK

TS updated the group on recent activity relating to HCR Prevention Strategy and the Major Accident Hazard Technical Groups.

Principles of Process Safety Leadership are being raised at OGUK Council meetings and Board (currently meeting fortnightly), linked to relevant safety moments illustrating one or more of the principles. These review high profile incidents and ask where the principles could have prevented incidents. Also inviting senior management to reflect on what they are doing to maintain focus on PPSL within their organisations.

TS invited the group to consider whether these can be added to safety alerts circulated via SCIS.

Action: TS to raise proposal to include PPSL with Safety Alerts group

TS advised that the OGUK Assurance workgroup has developed a guideline document for assurance, along with training material for leaders as well as for workforce delivering the framework which is almost ready to launch.

A group addressing Safe Isolation and Reinstatement of Plant (SIRPS) has been established, with the kick-off meeting planned for September. The group will focus on understanding why current guidance is not working well / being followed rather than developing additional guidelines. An example given was reviewing how to conduct robust line-walking. (e.g. robust line walking).

Management of Change topic has potential for a workstream in 2021.

Asset Integrity is being addressed along with the MER Asset Integrity taskforce, who have been asked to assist in the collection data, for presentation to OGUK board, in particular, what other indicators could be used to monitor industry performance in managing asset integrity?

SR noted that this aligned with concerns SCIS have heard raised regarding postponement of SC maintenance during pandemic. He asked the group to consider how best to refocus and energise.

TS noted that PPSL awareness is currently aimed at leadership but acknowledged it would be useful to think about use of safety alerts to communicate these to workforce.

The roll out of the assurance work will raise the profile, but there could be more to do on the workforce side – e.g. via SCiS OIM network.

Action: SR to consider including PPSL in OIM Network workstreams

HH echoed this from HSE perspective, that it is time to refocus on HCR prevention, the importance of which was recognised by the group.

Venting and Flaring group plan to reconvene in the week following this meeting, and have developed a guideline for initial actions to take where operations have changed, then plan to move on to the modelling work.

Technical Authority role – questionnaires issued, OGUK currently collating responses.

Adverse Weather –this is in abeyance until HSE report shared with industry.

Similar focus on returning to strategic plan following pandemic.

- StepChange in Safety –

SR noted that for Q2 SCiS had huge involvement in workforce communication around COVID-19, but were also now trying to focus back on to core activities.

SCiS have realigned workgroups around PPSL. People (Mental Health and Elected Safety Representatives groups); Process (Lifeboat Familiarisation, Simplification and Standardisation, E-observations, Connected Competence with EITCB); Plant (MAH understanding; Lifting Forum).

SR noted that work was ongoing to find means to address competency fade via technology, alerts and safety moments. It was noted that the Safe Space meetings were proving difficult to maintain online.

Work within the MAH group is ongoing to develop a film about HCR and SECEs.

SCiS are also working in connection with DROPS forum to align workscopes under the Lifting Forum.

SR introduced the next online campaign, which would be seven days for safety, running in September. Rather than run one longer event, each day would release a resource on a different topic, covering Major Hazards, ESR, Occupational Health, etc ending with a collective webinar tying all together on Sunday.

SCiS focus next on crane incidents and dropped objects.

4. COVID-19 Impact on MAH

All

Group agreed that all of our focus has come back into major accident hazards again following the Q2 disruption.

TS noted that OGUK Board focus is on information collation for SC maintenance to understand the impact the downmanning has had on activity, and to manage any implications arising.

A concern raised from the workforce regarding core crew doing work that would have previously been done by specialist contractors – specific questions raised about ensuring

competence. To balance this, there is also concern about specialist personnel coming from countries not on travel corridors, highlighting the difficulties facing industry.

CF raised the topic of gaining access to NHS testing, noting that capacity seemed to have been increased in recent weeks, and noting that access for asymptomatic testing is being granted for some sectors (education).

TS advised that OGUK continue to engage with relevant administrations on this and were looking at past data to understand normal year expectations of respiratory illness reported to medic weekly per installation. No movement yet on making capacity available.

Identifying the improvements brought by lockdown will be important following the pandemic. CF noted that remote inspection etc has worked well, in certain areas, creating efficiencies etc that HSE may maintain in future. OPRED and HSE inspectors agreed there is no substitute for boots on the ground, but found remote engagement very helpful in several areas, including for pre-visit activities and diving inspectorate.

5. Future Work Items

Post-transition – identify potential improvements to regulatory regime following EU exit.

It was noted this is unlikely to be high on political agenda in the medium term, but no harm in exploring and being ready for when it is.

Examples highlighted included following up on the post-implementation review of the SCR 15 regulations, including the value of CMAPP.

With many environmental regulations stemming from EU Directives, may find ways to simplify / streamline / improve.

Action: New chair to include regulatory improvement item to agenda for 2021 meetings

6. Committee Governance

Review of committee performance:

Attendees agreed to review WoW / ToR documents which will be circulated with minutes and provide feedback in December meeting.

Consider new chair for the group as well. Current chair finishes in Dec 2020. TBC at next meeting.

Action: Members to review Wow / ToR document for December meeting.

Action: Members to consider where chair should sit in 2021

7. AOAB

- **EERTAG governance**

TS stated that the group had asked about governance and where it should ultimately report to. The suggestion would be that it reported to OMAHAC and OGUK could bring an annual summary to this group for review and comment.

KR noted that the group used to report to predecessor group OIAC when it was set up after the Cullen inquiry. It would be useful to realign it to this group.

The general feeling was that the group should report through OMAHAC and this should be so minuted.

Action: TS to confirm with EERTAG at its next meeting in October.

JM raised a point for consideration regarding training standards, and how best to align training across different offshore groups. Standardising training requirements across divers, renewables, offshore etc would increase efficiency. An example is the requirement for diver medics having to retrain as a first aider to meet industry requirements for renewables. Noted that the Merchant Navy Training board is aligning with OPITO for some issues.

OPITO also leading on the connected competence work with EITCB.

There was general approval in principle of this project, and as an initial step, decision to invite OPITO to present to the group in December.

Action: TS to invite OPITO to present on topic in December