

# The **REGULATOR**

Issue 1: 2012



# From the CEO

Welcome to our first edition of *The Regulator* for 2012, published under our new NOPSEMA banner. The commencement of the new year brought new responsibilities for the organisation, with the establishment of NOPSEMA as Australia's national regulator for offshore safety, integrity and environmental management of offshore facilities in Commonwealth waters, and in coastal waters where state powers have been conferred.



NOPSEMA's environment function up and running	2
Administering petroleum safety zones	3
Explaining NOPSEMA's "no concurrent safety case assessment policy"	4
Environment management — oil spill contingency plans	5
New Australian drinking water guidelines	6
Changes to Victorian legislation	6
Western Australia withdraws conferral of power	7
OHS inspection report recommendations	7
Regulation and management c fatigue in the offshore oil and gas Industry	of 8
Regulatory statistics	9

"Safety is not an intellectual exercise to keep us in work. It is a matter of life and death. It is the sum of our contributions to safety management that determines whether the people we work with live or die."

Sir Brian Appleton after the Piper Alpha accident of 1988. NOPSEMA commenced operations on 1 January 2012, incorporating the business and regulatory functions of NOPSA (The National Offshore Petroleum Safety Authority) and the new functions and responsibilities arising from amendments to the *Offshore Petroleum Greenhouse Gas Storage Act (2006)*, and related Regulations.

These new functions included the addition of environmental management to our regulatory remit.

To ensure a smooth transition to NOPSEMA, a team of environmental specialists were recruited to ensure all the systems, procedures and processes were in full operation and ready to commence regulation of this area of jurisdiction from 1 January.

By the end of February, 21 environment plans had been submitted to NOPSEMA for assessment, and the decision-making process undertaken in accordance with specified timeframes. The transfer of responsibility for the regulatory oversight of previously accepted environment plans and oil spill contingency plans from state and territory Designated Authorities to NOPSEMA has also been completed.

In addition, NOPSEMA is now responsible for the administration of petroleum safety zones; these are specified areas surrounding petroleum wells, structures or equipment which vessels or classes of vessel are prohibited from entering. Notices regarding safety zone administration will be published in the Government Gazette as well as on our website at nopsema.gov.au. Guidance information for industry, policy documents, application forms and other information is also available at nopsema.gov. au. If you would like more information on what has changed and what stays the same, visit nopsema.gov.au.

I hope you enjoy reading this edition of *The Regulator* and I look forward to seeing you at some of the industry information seminars and workshops we have planned for 2012.

14 Cutte

Jane Cutler CEO





# NOPSEMA's environment function up and running

With the advent of the new year, brings the expansion of NOPSEMA's regulatory functions to include regulatory oversight of the environmental management of petroleum activities in Commonwealth waters.

NOPSEMA is now responsible for the assessment, inspection, investigation and enforcement regime in relation to environment plans under the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009, a responsibility formerly held by State and Territory Designated Authorities (DAs).

All environment plans submitted to, but not approved by the DAs prior to 1 January have been transferred to NOPSEMA for assessment in accordance with the regulations. Environment plans accepted by the DAs prior to 1 January remain in force, although the activities associated with the accepted plans will now be regulated by NOPSEMA.

NOPSEMA's costs will be recovered from industry in line with the <u>Commonwealth Cost Recovery Guidelines for</u> <u>Regulatory Agencies</u>. Levies are imposed in relation to recovering the costs of the new NOPSEMA environment function, including the introduction of assessment and compliance levies for environment plans.

The Offshore Petroleum and Greenhouse Gas Storage (Regulatory Levies) Act 2003, imposes the levies and the Offshore Petroleum Greenhouse Gas Storage (Regulatory Levies) Regulations 2004 prescribe how the levies are calculated and when they are due and payable. The environment plan levy includes:

- An activity amount, based on the anticipated regulatory effort expended in assessing a typical environment plan for a particular activity and
- A compliance amount, based on the duration and the regulatory compliance effort typically associated with the petroleum activity.

Following extensive industry consultation during the latter part of 2011, NOPSEMA has published a suite of information and guidance to assist industry in the preparation of environment plans and oil spill contingency plans. Along with policy documents, these interim guidance documents are available on NOPSEMA's website: nopsema.gov.au

Titleholders and operators are encouraged to regularly check the website for updates and the addition of new and revised guidance documentation.

CEO Jane Cutler speaking at the APPEA National Environment Conference







## Administering petroleum safety zones

NOPSEMA has commenced administration of petroleum safety zones as provided for in Chapter 6, Part 6.6 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* [OPGGSA]. Petroleum safety zones are specified areas surrounding petroleum wells, structures or equipment in which vessels or classes of vessel are prohibited from entering.

NOPSEMA's role in Part 6.6 of the *OPGGSA* involves assessment of applications for:

- The prohibition of vessels from entering or being present in a specified area (the petroleum safety zone) surrounding the petroleum well, structure or equipment, via a notice published in the *Government Gazette* by NOPSEMA,
- Written consent for vessels to enter and be present in a petroleum safety zone; and
- Written authorisation for a vessel to enter and be present in "the area to be avoided" (a large defined area in the Bass Straight detailed in schedule 2 to the OPGGSA).

Application forms supported by a policy document are available on the NOPSEMA website. All notices NOPSEMA has published in the *Government Gazette* will also be available on the NOPSEMA website.

Petroleum safety zones that were in place as of 31 December 2011 remain in force until they expire or are revoked by a subsequent notice published in the *Government Gazette*.

NOPSEMA does not have a legislated role regarding alleged infringements of petroleum safety zones. NOPSEMA does provide a <u>reporting template</u> to enable titleholders and facility operators to capture and pass on relevant information to the "authorised persons" in this respect (the Australian Federal Police, State or Territory Police, the Australian Defence Force, or the Australian Customs). This information may assist authorised persons in exercising their powers under Division 5 of Part 6.6 of the *OPGGSA*. In circumstances where an alleged infringement of a petroleum safety zone requires a facility emergency response plan to be implemented, the operator must notify and report the event to NOPSEMA as a dangerous occurrence in accordance with clause 82 of schedule 3 to the *OPGGSA*.

If you would like to be kept informed about publication of petroleum safety zone administration documents, or of notices establishing petroleum safety zones you can subscribe by emailing <u>safetyzones@nopsema.gov.au</u>. Please include your first name, surname, preferred email address, position, company and mobile phone or other contact details.

Ship approaching a facility





# Explaining NOPSEMA's "No concurrent safety case assessments" policy

The <u>NOPSEMA Safety Case Assessment Policy</u> - Section 4.7, details its policy regarding the assessment of only one safety case at a time for any one facility. In effect, this means that in a situation where an operator has already made a submission under the Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2009 [OPGGS(S)] Regulation 2.24, 2.30, 2.31 or 2.32 (or their State or Northern Territory equivalent, where applicable), and has not yet been notified of a decision and subsequently makes another submission under OPGGS(S) Regulation 2.30, for the same facility, NOPSEMA shall notify the operator that it is unable to make a decision with regard to the second, subsequent submission and set out a proposed timetable, if possible, for its consideration of that revised safety case [OPGGS(S) Reg 2.35 (1)(b)].

The principal reasons for a "no concurrent assessments" policy are:

- If the initial safety case for a new or proposed facility has been submitted by an operator and is being assessed; there is no safety case in force at that time, i.e. accepted by NOPSEMA, and therefore there is no safety case that can be revised. The submission of a revised safety case or revision to parts of a safety case in these circumstances is illogical and cannot be assessed.
- Requests for further written information that are made in respect of a revised safety case are likely to be relevant to a second, subsequent revised safety case submitted, since such requests for information are likely to have been based on apparent deficiencies or ambiguities in the safety case. It is not efficient for NOPSEMA, or for the facility operator, for NOPSEMA to seek answers to the same questions twice. Operators should ensure that any responses to requests for further written information in relation to a safety case submission, including any learning from the safety case assessment process, are appropriately integrated into the next submitted revision.

Facility operators that typically make several revised safety case submissions over a five year period, e.g. operators of mobile offshore drilling units (MODUs) addressing client-specific drilling campaigns, should consider what information, provided in such revisions, might reasonably be incorporated into the safety case in a generic way such that, over a period of time, the nature and scope of such revisions to a safety case may be reduced, becoming less onerous to prepare and to assess.

Noting that there can only be one safety case in force for a facility at any one time; if a subsequent revised safety case does not include information on the activities or facility equipment which was the subject of the preceding safety case, the operator will no longer be lawfully entitled to conduct those activities or use that equipment should the subsequent revised safety case be accepted. Operators should ensure that the safety case in force addresses all of the activities they may wish to conduct.

Where a submission is a revision to a 'part' of the safety case in force for a facility, the operator should make clear in the submission what documents will constitute the revised safety case for which acceptance is sought.







# Environmental management – regulatory approach to oil spill contingency plans

NOPSEMA, as reported elsewhere in this edition, is now the national regulator of the environmental management of petroleum activities in Commonwealth waters. The Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 require an *operator* of a petroleum activity to have an environment plan (EP) accepted by NOPSEMA prior to commencement of that activity. The regulations specify the required content of an EP, including that it must contain an oil spill contingency plan (OSCP) and provide for the maintenance of that plan.

Hence, from 1 January 2012, in accordance with the regulations, an OSCP will be assessed as an integral part of the assessment of the relevant EP. This results in a single assessment decision for the EP and its included OSCP. OSCPs will not be separately assessed and NOPSEMA will not accept an EP if it does not include the OSCP relevant to that particular activity.

The regulations identify a number of core concepts that must be demonstrated prior to an EP being accepted. These concepts are applicable to the OSCP as part of the EP and must be addressed in the submission for assessment by NOPSEMA;

- the OSCP is appropriate to the nature and scale of the activity,
- oil spill impacts and risks are evaluated and demonstrated to be reduced to ALARP and are of acceptable levels,
- the OSCP supports appropriate environmental performance objectives, standards and measurement criteria to manage risks identified in the EP,
- the implementation strategy is appropriate including monitoring, recording and reporting arrangements for a response to spills, and
- an appropriate level of consultation with relevant stakeholders has been undertaken in preparation of the OSCP.

NOPSEMA considers emergency conditions that may arise from the activity when assessing EP submissions against the requirements of the regulations and the Act. The implementation of emergency response strategies (activities) such as aerial dispersant application, boom deployment and other actions are therefore considered to be part of the petroleum activity and the associated environmental risks must be addressed in the EP. For example, the EP must identify, manage and monitor the environmental impacts associated with the response strategies proposed, and demonstrate that the associated risks from the response activity will also comply with the environment regulations.

NOPSEMA will issue guidance for operators and titleholders on the application of the National Plan to Combat Pollution of the Sea by Oil and Other Noxious and Hazardous Substances (The National Plan) with respect to offshore petroleum activities in Commonwealth waters, noting the institutional changes to the administration of the regulatory regime. This guidance will describe the arrangements for oil spill preparedness and response as they relate to the offshore petroleum industry. It will address the respective responsibilities of NOPSEMA and AMSA with respect to oil spill response and the expectations NOPSEMA has of operators both in preparing for and responding to oil spills in accordance with the regulations.



## New Australian Drinking Water Guidelines released

It is important for facility operators to regularly verify the quality of drinking water used at their facilities to ensure the welfare of all members of the workforce at the facility. [Clause 9(2)(b) of Schedule 3 to the *Offshore Petroleum and Greenhouse Gas Storage Act (2006)*.]

The newly released Australian Drinking Water Guidelines (ADWG) 2011 provide a framework for good management of small water supplies to ensure the water is safe to drink. The guidelines address both the health and aesthetic aspects of good quality drinking water and are available from the National Health and Medical Research Council website (www.nhmrc.gov.au).

The principal risk to human health from drinking water is the presence of pathogenic microorganisms. The supply of safe drinking water involves the use of multiple barriers to prevent the entry and transmission of pathogens. The effectiveness of these barriers should be monitored by a program based on operational characteristics and testing for microbial indicators.

The advantage of the ADWG framework is that it places emphasis on a preventive approach to managing water quality, with less reliance on water testing. Thus the focus, in relation to small water supplies, should be on regular inspection of the system to check for any sources of contamination, and the use of a clean, unpolluted water source.

Testing of water in small and remote supplies can present both economic and logistic difficulties, particularly for microbial samples that need to be transported to testing laboratories within 12–24 hours of collection. While application of the ADWG framework decreases reliance on drinking water quality testing, some testing is still important as a means of verifying that the barriers and preventive measures implemented are working effectively to protect health.

Verification of drinking water quality provides an assessment of the overall performance of the water supply system and the ultimate quality of drinking water being supplied to the workforce.

# **Changes to Victorian Legislation**

The Government of Victoria recently made changes to its offshore petroleum occupational health and safety legislation to largely align with the equivalent Commonwealth legislation. The former *Victorian Petroleum (Submerged Lands) Act 1982* has been replaced by the Victorian *Offshore Petroleum and Greenhouse Gas Storage Act 2010* and the associated regulations; the former Victorian Petroleum (Submerged Lands) Regulations 2004, have been replaced with the Victorian Offshore Petroleum and Greenhouse Gas Storage Act 2010.

One of the main consequences of these legislative amendments is that, like the Commonwealth legislation, the new Victorian legislation brings licensed pipelines in designated coastal waters in line with all other facilities in relation to the requirement for the operator to submit a safety case rather than a pipeline management plan. The regulatory authority responsible for assessing pipeline-related occupational health and safety submissions (e.g. scopes of validation and safety cases) is now NOPSEMA, replacing the Victorian Department of Primary industries (DPI). The legislation now also encompasses offshore greenhouse gas storage operations (in addition to offshore petroleum operations), consistent with the Commonwealth legislation.

As part of the transitional provisions associated with the regulatory amendments, a pipeline management plan previously accepted by the DPI before 1 January 2012 is taken to be a safety case that was accepted by NOPSEMA. However, it should be noted that any change in circumstances that require a revision to the pipeline management plan (safety case) will be required to fully meet the safety case contents requirements of the regulations.

The amended legislation can be found at <u>www.legislation.vic.gov.au</u> or by clicking <u>here</u> for the legislation links on NOPSEMA's website.



# Western Australia withdraws conferral of powers in WA designated coastal waters

The Western Australian Government has recently withdrawn conferral of powers to NOPSEMA for Western Australian designated coastal waters. This occurred as of 1 January 2012. The amendments to the Western Australian *Petroleum* (*Submerged Lands*) Act 1982 and associated regulations mean that NOPSEMA is no longer the regulator of occupational health and safety in Western Australian designated coastal waters.

As a consequence, the regulatory responsibilities for occupational health and safety in WA designated coastal waters now rest with the relevant WA Minister. In practice, regulatory interactions for these offshore petroleum facilities and operations are generally conducted through the Western Australian Department of Mines and Petroleum (DMP).

Operators of facilities (including vessels, structures and pipelines) and diving contractors operating, or intending to operate, in Western Australian designated coastal waters should consult with DMP in relation to the following:

- Operator nomination and registration;
- Submission and assessment of new and revised safety cases, pipeline management plans, diving safety management systems, diving start-up notices and where there is no operator diving project plans, scopes of validation and validation statements;
- Inspection of WA designated coastal water facilities, including follow-up on recommendations and any enforcement action arising from previous inspections; and
- Notification and reporting of accidents and dangerous occurrences.

Further details are available from: www.dmp.wa.gov.au

NOPSEMA remains the regulator for occupational health and safety associated with offshore petroleum operations in Commonwealth waters and in other State and Northern Territory designated coastal waters where powers have been conferred e.g. Victoria, Tasmania, South Australia and the Northern Territory. Mirror legislation for Queensland and New South Wales is not yet in place and therefore NOPSEMA currently has no legislative responsibilities for occupational health and safety for offshore petroleum operations in designated coastal waters of these states.

# **OHS inspection report recommendations**

In the majority of cases, the NOPSEMA OHS inspection report recommendations are satisfactorily addressed in a timely manner by facility operators. However, NOPSEMA has recently observed instances where facility operators have failed to demonstrate that they have given adequate consideration to recommendations, or have reported that recommendations have been closed out when, in fact, no action had been taken to address them.

As soon as practicable after conducting inspections, the NOPSEMA inspectors must prepare a report for NOPSEMA that includes their conclusions, the reasons for those conclusions and any recommendations they wish to make arising from the inspection.

NOPSEMA must then give a copy of the report, along with any written comments to the operator of the facility to which the report relates, or if the report relates to activities performed by an employee of another person, to that other person. NOPSEMA's policy is to provide these reports with a timescale to the recipient with details of any actions to be taken as a result of the recommendations or conclusions in the report.

NOPSEMA has a policy of graduated enforcement responses to noncompliance with the regulations. Where an identified breach is minor, the first regulatory step is often to encourage facility operators, usually in the form of a recommendation in an inspection report, to initiate improvements. The nature and process associated with OHS inspection reports are described by Clause 80 of Schedule 3 to the *OPGGSA*. Whilst failure to adequately address recommendations made in an OHS inspection report is not an offence in itself, NOPSEMA takes such failures into consideration when deciding on whether or not to initiate formal enforcement action in relation to underlying breaches of legislation.

Repeated instances of inadequate or misleading responses to inspection reports therefore increase the likelihood that the OHS inspectors and NOPSEMA will move from an advisory stance to a more formal enforcement approach. Operators are advised to ensure that recommendations contained within NOPSEMA inspection reports are acted upon in a timely and appropriate manner.



# Regulation and Management of Fatigue in the Offshore Oil and Gas Industry

Shift work, long hours and international travel often contribute to fatigue. Physical and psychosocial stressors to which offshore workers are exposed (e.g. noise, vibration, cramped workspaces, and heavy work tasks) may act to accentuate fatigue associated with long work hours. Between February 2005 and July 2011, NOPSEMA has received 13 complaints and 10 reported accidents or dangerous occurrences relating to fatigue.

The International Association of Oil and Gas Producers (OGP) defines "Occupational Fatigue" as "the progressive decline in alertness and performance resulting in sleep."

Occupational fatigue is well documented in the literature (Mitler et al., 1988; Dinges, 1995) as a factor in major incidents such as the Three Mile Island and Chernobyl nuclear reactor meltdowns, the Challenger Space Shuttle disaster, the Bhopal Union Carbide plant explosion, the grounding of the Exxon-Valdez oil tanker. The US Chemical Safety Board found that fatigue likely contributed to Texas City refinery disaster.

Fatigue Risk Management Systems (FRMS) are now a globally accepted methodology for managing the risk of employee fatigue in safety-sensitive businesses, including the aviation, petrochemicals and rail industries.

New laws, regulations, and standards continue to be published that require companies in a variety of industries to design and implement FRMS. For example, the American Petroleum Institute published a recommended practice entitled "*Fatigue risk management systems for personnel in the refining and petrochemical industries*" which provides guidance to employees, managers, supervisors and contractors on recognising, understanding and managing fatigue in the workplace.

Other guidance that exists in the public domain includes: *Managing fatigue in the workplace* prepared by the OGP; *Guidance for managing shift work and fatigue offshore* prepared by the Health and Safety Executive (HSE); and *Offshore working time in relation to performance, health and safety: A review of current practice and evidence* prepared by the University of Oxford for the Health and Safety Executive (2010).

As with all hazards that exist in the offshore oil and gas industry the operator must ensure that risks associated with fatigue are reduced to as low as reasonably practicable (ALARP) by identifying the hazards, assessing the risks and implementing appropriate controls.

The OPGGS(S) Regulations 2009 (Reg 3.1) requires that:

The operator; employer or person in control of facility must not allow, or require, a member of the workforce who is under the person's control, to work for:

- (a) a continuous period; or
- (b) successive continuous periods,

of a duration that could reasonably be expected to have an adverse effect on the health or safety of the member of the workforce or other persons at or near the facility.



### Managing fatigue in the workplace

A guide for oil and gas industry supervisors and occupational health practitioners



The Regulator



### **Regulatory activities**

#### As at 27 February 2012

Disclaimer: Data presented here may vary as further information becomes available.

#### Assessments

Two safety cases and one environment plan have been rejected since 1 January 2012.

Assessment		S	ubmitte	d	Accep	oted / ag advised		Rejected / refused			
		2011	20	12	2011	2011 20		2011	20	12	
Assessment type	Subtype	Dec	Jan	Feb	Dec	Jan	Feb	Dec	Jan	Feb	
cofoty coco	new	3	4	2	1	1					
safety case	revision	6	15	4	5	4	4		3	1	
diving project plan	N/A										
diving safety	new										
management system *withdrawn	revision	1*	1				1				
pipeline safety	new										
management plan	revision							2			
renewal appl			1	2		1	1			1	
petroleum safety zones	application to enter										
areas to be avoided	application to enter			1							
scope of validation	N/A	5	1	9	3	3	6		1		
request for exemption under OHS regulations	N/A										
well activity application	N/A	19	8	5	16	13	10				
	new	3	1	1	3	1	1				
well operations management plan	variation		1			1					
	N/A										
diving start-up notice	N/A		2	5			4			1	
environment plan *includes six plans submitted to	new		12*	9		2	1			1	
DAs - not accepted prior to 1 January	revision			1							
Total		37	46	<b>3</b> 9	28	26	28	2	4	4	

Note : In some instances, a single assessment may be submitted for multiple facilities.



#### Inspections

NOPSEMA inspected an average of eight facilities per month in 2011, with an average of 16 recommendations made per facility.

		1	20	11				1	2012		
Туре	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May
Facilities inspected	2	7	4	12	11	6	6	8			

#### Inspection scopes

Some of the more common topic scopes covered in the recent inspections included:

Inspection scopes - examp	les - Dec 2011 to Feb 2012
Following up previous recommendations	Meeting with HSRs
Themed audit - maintenance management	Monitoring, auditing and review
Hazardous substances	Vessel collisions

#### Inspection recommendations

Some of the recommendations issued in the recent inspections included the following:

Inspection recommendations -	- examples - Oct and Nov 2011
Ensure the <i>Subsea Handbook</i> is formally captured within the document control system.	Implement critical functional testing routines to ensure that the offloading pipe emergency shutdown valbe undergoes periodic leak integrity and valve closure time testing.
Workshop machinery - guarding: As a matter of priority, implement guarding in accordance with appropriate standards to all workshop rotating machinery.	Induction - DVD: Review the current onboard facility induction DVD and make corrections to factual errors.
Ensure major hazard reviews are undertaken annually in accordance with audit schedule.	Develop a vessel detection, monitoring and potential collision response procedure.

# 

#### Accidents and dangerous occurrences

NOPSEMA has been notified of five reportable environmental incidents since 1 January 2012.

			20	)11			2012					
Туре	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr		
Accidents												
Death or serious injury	1	1				1		2				
Incapacitation >3 days lost time injuries	2		1	2	2	1		1				
Accidents subtotal	3	1	1	2	2	2	0	3				
Dangerous occurences												
Could have caused death or serious injury	4	5	2		3	4	1	3				
Could have caused incapacitation >3 days lost time injuries	2	1	4	4	5	6	1	2				
Fire or explosion		1		2			1	1				
Collision marine vessel and facility												
Uncontrolled hydrocarbon release >1 - 300 kg	1		3	1	2	3	2	2				
Uncontrolled hydrocarbon release >300 kg	2			1								
Uncontrolled petroleum liquid release >80 - 12 500 L	1			1								
Uncontrolled petroleum liquid release >12 500 L												
Well kick >50 barrels												
Unplanned event - implement emergency response plan	7	6	9	7	16	5	16	4				
Damage to safety-critical equipment	11	4	7	3	3	5	7	6				
Pipelines - significant damage												
Pipelines - substantial risk of accident												
Pipelines - kind needing immediate investigation												
Other kind needing immediate investigation	2	1	1	3	1	1		2				
Dangerous occurrences subtotal	30	18	26	22	29	24	28	20				
OHS incidents total	33	19	27	24	31	26	28	23				
Environment incidents												
EM - other							1					
EM - hydrocarbon / petroleum fluid release								2				
EM - chemical release								2				
EM incidents total							1	4				
OHS and EM Incidents Total	33	19	27	24	31	26	29	27				

(As notified under OPGGS(S) Regulation 2.41.)



#### Complaints

Three complaints regarding bullying, corrosion and accommodation facilities have been reported since 1 January 2012.

			20	11					2012		
Туре	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May
Complaints	0	1	2	0	2	0	1	2			

#### Injuries

The total number of recordable injuries reported spiked in November up to 13.

I	Aug	~			2011							
	0.0	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May		
	1	2	2	4	2							
	2	1	2	2	3	data not yet						
	3	1	4	7	3	available						
	6	4	8	13	8							
3	3 3 ) 5	3 2 ) 3 5 6	3 2 1   3 3 1   5 6 4	3 2 1 2   3 1 4   5 6 4 8	3 2 1 2 2   0 3 1 4 7   5 6 4 8 13	3 2 1 2 2 3   0 3 1 4 7 3   5 6 4 8 13 8	3 2 1 2 2 3   3 2 1 2 2 3   0 3 1 4 7 3   5 6 4 8 13 8	3 2 1 2 2 3   0 3 1 4 7 3   5 6 4 8 13 8	3 2 1 2 2 3 data not yet available   0 3 1 4 7 3   6 6 4 8 13 8	3 2 1 2 2 3   3 2 1 2 2 3   3 3 1 4 7 3   6 6 4 8 13 8		

\* LTI includes lost time injuries less than three days

As reported under OPGGS(S) Regulation 2.42. (written injury summaries submitted not less than 15 days after the end of each month)

#### **Enforcement actions**

Seventeen improvement notices and two written warnings have been issued over the last three months for a range of issues on seven facilities.

	2011									2012						
Enforcement action types	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May					
Verbal advice/warning																
Written advice/warning	1	3	1			1	1									
Improvement notice		1	10	5	1	11	4	2								
Prohibition notice	1			3												
Intent to withdraw SC acceptance	1															
Withdrawal of acceptance																
Prosecution brief																
TOTAL	3	4	11	8	1	12	5	2								





#### **Upcoming events**

- 20 March International Marine Contractors Association Safety and Environment Seminar, Rio De Janeiro (Brazil)
- 20 March NOPSEMA Oil Spill Contingency Planning Workshop, Perth
- 13 April APPEA Conference and Exhibition, Adelaide
- 27 April NOPSEMA Environment Workshop, Perth

Operators of petroleum activities should take note of recent amendments to the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 that will come into force on 1 April, 2012. The amendment relates to stakeholder consultation requirements and associated acceptability criteria provisions for environment plans. Operators should refer to Regulations 11(1)(f), 11A and 16(b) of the amended regulations for further details.

#### Feedback

NOPSEMA welcomes your comments and ideas on offshore health and safety regulation, NOPSEMA's role and your preferred communication methods and publications. Please direct media enquiries, requests for publications, and enquiries about NOPSEMA events to communications@nopsema.gov.au. Operators and other employers are encouraged to circulate this newsletter to their workforce. Past issues of this newsletter are available from NOPSEMA's website at nopsema.gov.au.

### Subscribe or cancel a subscription

Subscribe to *The Regulator* or cancel your subscription by sending an email to communications@nopsema.gov.au. Please include your first name, surname, preferred email address, position, company and mobile phone or other contact details.

#### **Contact details**

#### **Perth Office**

Level 8, 58 Mounts Bay Road Perth, Western Australia

t: +61 (0) 8 6188 8700 f: +61 (0) 8 6188 8737

GPO Box 2568 Perth WA 6001