

General Direction – s 574

Offshore Petroleum and Greenhouse Gas Storage Act 2006 (Cth)

Direction No: 1914

To Woodside Energy Ltd:

Issue of Direction/s - section 574 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006*

I, Derrick O’Keeffe of the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA), make this instrument under section 574 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (the Act) pursuant to a delegation dated 13 June 2023.



Derrick O’Keeffe
Head of Division – Safety and Integrity

16 June 2023

1. Commencement

This direction takes effect on the date of signature.

2. Application

This direction applies to Woodside Energy Limited ACN 005482986 as a registered holder of Production Licence WA- 1-L.

3. Extended Application

Pursuant to subsection 574(3)(a) of the Act, this instrument also applies to Woodside Energy Limited ACN 005482986, as the registered operator of the North Rankin Complex Facility.

4. Direction

- a. Woodside Energy Ltd is given the directions contained in Schedule 1.
- b. Each direction in Schedule 1 is a separate direction.

Schedule 1

Direction 1

Implement additional risk reduction control measures to ensure that all rope access and/or rigging and/or lifting requiring the use of clamps of any kind for operations at the North Rankin Complex facility are conducted in a safe manner.

Direction 2

As soon as reasonably practicable, conduct an independent Review of all systems, processes and operations that may involve rope access and/or rigging and/or lifting requiring the use of clamps of any kind for operations at the North Rankin Complex facility to assist in ensuring the safety of personnel involved or affected by such operations. The Review is to be conducted by a sufficiently independent (with respect to Woodside Energy Ltd or its existing contractors and as agreed by NOPSEMA) and suitably qualified organisation(s) and will include but not be limited to the following:

- a. Terms of Reference which are to be provided to NOPSEMA for comment prior to undertaking the Review
- b. reference to industry best practices and identification of gaps with the facility's existing work practices whether by Woodside or its contractors
- c. consideration of the techniques and work practices that may eliminate, or engineer-out risks to personnel
- d. the role of supervision, management and executive oversight to ensure the safety of personnel
- e. recommendations for remedial actions for implementation, which address the gaps identified in the Review

A copy of the Review is to be provided to all titleholders of WA-1-L.

Direction 3

Implementation of additional risk reduction control measures from Direction 1 are to continue until the remedial actions identified in Direction 2(e) are implemented to NOPSEMA's satisfaction.

Direction 4

Until the remedial actions identified in Direction 2(e) are implemented to NOPSEMA's satisfaction, submit a written report by close of business every Wednesday or other intervals agreed to by NOPSEMA, describing the details of (i) all implemented additional risk reduction control measures and a justification for the adequacy of those controls to provide for safe work in response to Direction 1 and (ii) progress against requirements in response to Direction 2. NOPSEMA will use this report as part of its compliance monitoring process.

Explanatory Statement

On 2 June 2023 NOPSEMA received an initial notification report from Woodside Energy Ltd of an incident at the North Rankin Complex facility. Later that day, Woodside Energy Ltd advised NOPSEMA that a person had suffered fatal injuries.

The initial report provided to NOPSEMA advised that the incident occurred during maintenance work at height.

NOPSEMA immediately launched an investigation into this matter which is currently ongoing. NOPSEMA mobilised an investigation team to the facility.

Following the incident, Woodside advised NOPSEMA that it had issued a standing order on 2 June 2023 to all its operating assets in Australia, to cease rope access activities (except where a Woodside Offshore/Onshore Installation Manager (OIM) had approved them, with a Woodside “Level 2 Risk Assessment”) until the incident was further understood through investigation.

Woodside has subsequently advised NOPSEMA that it had revised the standing order as the understanding of the incident progressed. On 4 June 2023, Woodside had prohibited multi-directional screw clamp usage.

Woodside advised that on 9 June 2023, the standing order was revised to provide additional guidance on the controls required for rope access and rigging or lifting activities and the prohibition on multi-directional screw clamp usage was specifically applied to rigging or lifting activities.

On 8 June 2023 NOPSEMA issued a Safety Bulletin to highlight the risks of work involving the rigging, manipulation, and movement of loads, including people and equipment. This relates to a concerning trend being observed in industry where an increasing number of incidents can be linked back to insufficient assessment of risks such as stored energy, exclusion zones, line-of-fire and incorrect equipment selection or improper use.

These risks significantly increase when circumstances change during the execution of the job and no further risk assessment is undertaken. NOPSEMA expects the general principles set out in the Safety Bulletin be revisited by industry and which may improve the identification of risks and the implementation of effective controls for these kinds of activities.

The Safety Bulletin provides a reminder of the need to identify risks and apply effective controls to always protect the safety of personnel.

Notes

Notification of a direction has an extended application

Pursuant to s 575 of the Act, as the direction(s) above apply to:

- a) the registered holder; and
- b) a specified person under 574(3)(a)

the registered holder must cause a copy of the notice by which the direction was given to be:

- c) given to that other person; or
- d) displayed at a prominent position at a place in the offshore area frequented by that other person.

OR

Pursuant to s 575 of the Act, as the direction(s) above apply to:

- a) a registered holder; and
- b) a person referred to in paragraph 574(3)(b);

the registered holder must cause a copy of the notice by which the direction was given to be displayed at a prominent position at a place in the offshore area.

Breach of a direction

Under sub section 576(1) of the Act, if a person is subject to a general direction under section 574 and the person engages in conduct that breaches that direction, the person commits an offence:

Fault-based offence – 5 years imprisonment or 2,000 penalty units, or both (10,000 penalty units for a body corporate).

Strict liability offence – 100 penalty units (500 penalty units for a body corporate).

Civil penalty provision – 525 penalty units (2,625 penalty units for a body corporate).

Continuing offences – a person who commits a fault-based or strict liability offence commits a separate offence in respect for each day during which the offence continues. The maximum penalty for each day that the offence continues is 10% of the maximum penalty that can be imposed in respect to that offence.

Continuing contraventions of civil penalty provisions – a person who contravenes the civil penalty provision commits a separate contravention in respect for each day during which the contravention continues. The maximum civil penalty for each day that the contravention continues is 10% of the maximum civil penalty that can be imposed in respect to that contravention.