

## OHS Improvement Notice

*Offshore Petroleum and Greenhouse Gas Storage Act 2006, Schedule 3 clauses 78, 78A and 78B*

**Notice No:** 1905

**Date:** 19/04/2023

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To: V.Ships Offshore (Asia) Pte Ltd

In conducting an OHS inspection in relation to the Pride facility, I [REDACTED], a NOPSEMA inspector appointed under section 602 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (the Act), am satisfied on reasonable grounds that

V. Ships Offshore (Asia) Pte Ltd has contravened a provision of a listed OHS law and is likely to contravene that provision again

AND

As a result, there is, or may be, a risk to the health or safety of a person at the Pride facility.

The contravention that I am satisfied has contravened a provision of a listed OHS law and is likely to contravene that provision again is Cl. 9(1)(b) of Schedule 3 to the OPGGS Act.

The reasons for my opinion are:

- V.Ships have failed to take all reasonably practicable steps to implement and maintain systems of work at the facility that are safe and without risk to health because they have failed to ensure the implementation of a planned maintenance system for well intervention equipment that is comprehensive and integrated. Specific deficiencies include:
  - V.Ships did not carry out any verification measures regarding maintenance of the Expro well intervention equipment. Specifically, V. Ships had not completed any audit of Expro equipment or systems at the time of the inspection, despite Expro equipment having been installed and operated on the Pride facility for more than one year.
  - V.Ships was aware that Expro personnel on the Pride facility were not provided access to the computerised system used for management of well intervention equipment maintenance.
  - V. Ships was not aware that the Expro high pressure flushing pump has not been captured in the planned maintenance system.
  - Expro personnel were not able to demonstrate that the high pressure flushing pump unit has been captured in the planned maintenance system.
  - Expro personnel were also not able to provide evidence of some other documented maintenance system for the high pressure flushing pump, such as a plan or procedure from the flushing pump manufacturer or supplier.
- V.Ships is likely to contravene the requirements of the listed OHS law again because the Expro well intervention equipment will remain on the Pride facility for the foreseeable future. V. Ships was aware of some issues, like the lack of access to the computerised maintenance system. In other cases, V.

Ships was not aware of the issues, such as the omission of the high pressure flushing pump from the planned maintenance system, because they failed to conduct any verification measures to assure themselves that the Expro equipment or systems were fit for purpose.

As a result of this contravention, I am satisfied that there is, or may be, the risk to the health or safety of any person from fire or explosion resulting in death or serious injury following a potential loss of hydrocarbon containment from fluid handling equipment during well intervention work on the Pride facility.

I am satisfied on reasonable grounds that the following action(s) must be taken by the responsible person to reduce or prevent the risk:

1. Ensure the implementation of a planned maintenance system for well intervention equipment that:
  - a. is comprehensive and integrated and includes the maintenance programs for all well intervention equipment that takes into account possible failure modes, actual operating conditions, and the recommendations of equipment suppliers or manufacturers, and
  - b. that the facility workforce can readily access.

You are required to take action to reduce or prevent the risk within 30 days from the date of this notice.

██████████  
**NOPSEMA INSPECTOR**  
██████████

19 April 2023

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When the required action(s) has been completed, the Responsible Person is to submit this part of the notice to the following person via:

Post: Level 8, 58 Mounts Bay Road  
Perth WA 6000

Email: [submissions@nopsema.gov.au](mailto:submissions@nopsema.gov.au)

Name: [REDACTED]  
Position: **NOPSEMA INSPECTOR**  
Contact number: [REDACTED]

By signing below, I confirm on behalf of V. Ships Offshore (Asia) Pte Ltd that the specified action described in Improvement Notice No. 1905 has been undertaken within the period specified.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

(to be signed by responsible person only when the notice has been complied with)

## Notes

1. Under clause 78A of Schedule 3 to the Act, a responsible person who fails to ensure that this notice is complied with, to the extent that it relates to any matter over which the responsible person has control:
  - a. commits an offence and may be liable to a penalty of 300 penalty units for the offence; or
  - b. contravenes a civil penalty provision and may be liable to a civil penalty of 400 penalty units.
2. For every day proceeding the initial offence or contravention the notice is not complied with, the responsible person commits an offence or contravention in respect of each day (including a day of a conviction under this clause or any later day) during which the offence or contravention continues.
3. A copy of this notice must be displayed in a prominent place at or near each workplace where work affected by the notice is being performed. It is an offence to tamper with or remove it until the notice has ceased to have effect.
4. The recipient of this notice must ensure that all relevant requirements for giving copies of the notice to certain persons and representatives are complied with in accordance with cl 78b to Schedule 3 to the Act.
5. Under clause 80A of Schedule 3 to the Act, any of the following persons may request the reviewing authority in writing to review the NOPSEMA inspector's decision:
  - the operator of the facility;
  - the titleholder, if the notice is issued to a titleholder;
  - any person to whom an improvement notice has been issued;
  - an employer, if affected by the decision;
  - a relevant health and safety representative; a relevant workforce representative, if requested by a member of the workforce affected by the decision;
  - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.