

Petroleum Incident Regulations Consultation paper
Respondent Meeting
IOOA
Wednesday Oct 9th 2013

Location: CER Offices
Time: 11.00

Attended by:

| | |
|-----------------|-----------------------|
| Fergus Cahill | IOOA |
| Mike Murray | IOOA (Kinsale) |
| John Conroy | IOOA (SEPIL) |
| Fergus Roe | IOOA (Providence) |
| Emmet Brown | IOOA (Landsdowne) |
| Jamie Wallace | IOOA (Cairn) |
| Sheenagh Rooney | CER |
| Liam Murphy | CER |
| Róisín Cullinan | CER |
| John Morgan | CER Technical Advisor |
| Martin Maple | CER Technical Advisor |

Minutes:

1. *Introduction*

- The meeting was opened by CER and attendees were introduced.

2. *Discussion on IOOA responses to the Consultation Paper and Draft Regulations:*

A number of points relating to the IOOA submission were discussed, including:

IOOA Petroleum Incidents Response

CER gave an overview of what is set out in the Act which regard to petroleum incidents and what the requirements laid out in the Act are and, specifically, that the CER is required through regulation, under (f), to identify incidents beyond those in (a)-(e) that should be reported. and as such is the subject of this consultation.

IOOA queried the wording of the following in particular the word purported. “*CER shall be entitled to rely on any notification purported to be made on behalf of a petroleum undertaking*” (ref. Section 3.1).

CER Response: This wording will be reviewed.

- **Prescribed Occurrence**

IOOA highlighted that the “prescribed occurrences” as currently drafted, are very prescriptive in nature, and are not linked to the level of risk associated with the

occurrence. IOOA stated that CER should qualify what they mean by prescribed occurrences.

CER Response: CER will review prior to publication of the decision paper.

- **Definition of Petroleum Incident**

IOOA queried point E of the definition of petroleum incident and stated that this could refer to any piece of equipment on petroleum infrastructure including that which is not safety critical. They stated CER should clarify further what is meant by this. IOOA stated that this reporting requirement would not be an efficient working system due to the volume of reports that would need to be generated.

CER Response: CER stated that they would take on board the IOOA comments in developing the final Regulations.

- **HSA Reporting Requirements**

IOOA queried why the CER has similar reporting requirements to the HSA, specifically why are personal injuries included. IOOA stated the HSA system is well established and that as the reporting requirements are similar, the CER should use the same format as the HSA.

CER Response: CER said that they would review the reporting requirements that are similar to those required by the HSA.

- **Release Threshold**

IOOA queried why the release thresholds are different from other industries and other countries. They stated that the figure is very low and pointed out the difficulties in quantifying a small release. They stated that it may be better to call them “uncontrolled releases” as there is not a specified release time period. They highlighted the need to have a release time included.

CER response: CER stated that the release levels in place are similar to what is in place with industry bodies such as the IRF. CER stated that they are also in line with what is being developed by UK Oil and Gas. CER stated that the consultation paper provides references to the sources of the international safety reporting regimes that were reviewed to inform the development of the Regulations.

- **BOP Operation**

IOOA stated that the BOP may be operated in a planned manner for activities such as maintenance and that this should not be a reportable incident.

CER Response: The CER will clarify this metric such that planned operations are not included.

3. *Closing*

The CER noted that the Decision Paper is due for publication in early November 2013.