

Compliance Assurance System 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:*

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

IOOA Compliance Assurance Response

- **ICB Approval Process**

IOOA outlined their concern that the CER has a veto on the petroleum undertakings choice of ICB.

CER Response: CER stated that there would be no need to veto if the ICB met the guidelines set out. CER stated that they would review the text to see if it needed to be phrased in a more positive tone.

IOOA highlighted that with a 4 week approval process any petroleum undertaking who is submitting a safety case on the 1st December would have to submit an ICB submission on the 1st November for an approved ICB to be in place when the SC was submitted.

CER Response: CER stated that the timings would be reviewed. Additionally specific arrangements would be discussed within specific transition strategies for each petroleum undertaking.

- **Well Examiners**

IOOA questioned the requirement to have well examiners certified to ISO 9001 and pointed out that many well examiners are not accredited to this standard. They pointed out that verification should focus on how the process meets relevant standards and codes. They also queried the terms used in the stages of the well lifecycle.

CER Response: CER stated well examination and facilities verification must be carried out to ISO9001, or an equivalent standard, or demonstration of a process that would meet such a standard and that the text would be reviewed to clarify this. CER stated that they would look at the wording of the stages in the well lifecycle, but that the wording is not critical as the whole process from design to the well activity itself must be subject to well examination.

- **Independent Reviewer**

IOOA questioned why the CER has gone beyond what is stated in the Act with regards to independence.

CER Response: CER pointed out section 13M(6) of the Act which states “*systematic assessment of the adequacy of the safety management system, carried out by persons who are sufficiently independent of the system (but who may be employed by the petroleum undertaking)*” is not the same as an independent review of a safety case. An independent safety case review is not an internal organizational review, carried out by sufficiently independent persons but a complete review of the safety case. CER stated that they will have a look at the wording of this section to make the distinction clearer.

- **ICB Overlap with Audit and Inspection**

IOOA queried whether CER Audit and Inspection Activities would overlap with the verification work of the ICB.

CER Response: CER stated that the 5 year Audit and Inspection Programme developed by the CER will cover all aspects of the safety case and in some instances may overlap with areas covered by the ICB. CER also pointed out that they may inspect areas where the ICB finds issues.

3. *Closing*

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