

**Compliance Assurance System Guidelines Consultation Paper Respondent Meeting  
Shell E&P Ireland Limited (SEPIL)  
Wednesday Sept 25<sup>th</sup> 2013**

**Location:** CER Offices  
**Time:** 14.00

**Attended by:**

Gerry Costello	SEPIL
Conor Murphy	SEPIL
John Conroy	SEPIL
Andrea Ahern	SEPIL
Stuart Basford	SEPIL
Tony Stead	SEPIL
Sheryl Hurst	SEPIL Consultant, Risktec Solutions Ltd
Eamonn Murtagh	CER
Alice Hanly	CER
Ben Browne	CER
John Morgan	CER Consultant, GL Noble Denton
Martin Maple	CER Consultant, GL Noble Denton

**Minutes:**

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

- Wells related issues

SEPIL stated that it would be helpful if the CER defined (and used) the term Well Examiner (which is commonly used in industry and other regimes) rather than including it under the broader term of Independent Competent Body (ICB).

SEPIL stated that the ISO 9001 Certification should not be a requirement as this will exclude many experienced, competent and independent Well Examiners. It may be difficult for petroleum undertakings to source competent Well Examiners with this certification.

SEPIL is of the view that the requirement for an ICB to witness fabrication is too onerous as equipment is already required to be certified by independent third parties e.g. notified bodies under the PED.

- General Issues

SEPIL queried the basis for the selection of the Safety Performance Indicators in particular why a value of 1kg of gas released was chosen as the threshold as a significant release.

It was proposed by SEPIL that simpler 'independence' requirements are used by the CER and for the CER to clarify the term "associated management systems" with regards to Structural Critical Elements.

SEPIL questioned the requirements of a safety case review to be independent. It was clarified by the CER that the requirement for an independent reviewer was a policy decision by the CER as part of the establishment and implementation of a risk-based petroleum safety framework<sup>1</sup>.

### ***Closing***

The CER noted that the Decision Paper will be clarified where appropriate.

The decision on the Compliance Assurance System Guidelines is due for publication early November 2013.

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<sup>1</sup> Section 13I(1) of the P(EE)S Act