



Irish Offshore
Operators'
Association

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Ms Róisín Cullinan,
Regulatory Manager – Petroleum Safety
Commission for Energy Regulation
The Exchange
Belgard Square North
Tallaght
Dublin 24

2nd October 2015

Dear Róisín,

IOOA Comments on the Petroleum Safety Framework Documents

The IOOA Safety Sub-committee has reviewed the first set of documents under the Petroleum Safety Framework issued recently for consultation. We would like to highlight a number of points for discussion and clarification. These are as follows:

1. The PSF Update Consultation document states (page 25) that *“Verification scheme and performance standards now required to be in the safety case (suggested as an appendix)”* due to requirements of the 2015 Act. This could potentially be problematical as any change in Performance Standards with time (not uncommon) could potentially trigger a material change if these are embedded in the Safety Case (as proposed in the current guidance document). In contrast to the above, it is our understanding that the UK regulations only require a summary of the verification scheme.
2. Regarding the proposed changes to the Petroleum Incident Regulations, the PSF Consultation Document (CER/15/222), section 5, page 27 states that CER reportable Incidents must align with European common reporting legislation (EU 1112/2014). The PSF Consultation Document states that *“Existing petroleum incidents broadly align. No significant change anticipated”*. However a quick review of the EU legislation throws up some significant changes. For example, the following are not reportable incidents under the EU regulations:
 - Injury to a worker that requires treatment at a hospital (EU regulations require reporting of serious injury to 5 or more persons in the same accident)
 - Standby vessel not being in a position to provide rescue to persons on offshore petroleum infrastructure,
 - Mustering on onshore or offshore petroleum infrastructure, other than for planned drills.

The new Petroleum Incident Regulations, to be published by CER in Jan 2016, will take account of the EU legislation. IOOA notes that, in contrast to the statement quoted above regarding *no significant change anticipated*, there are actually significant changes.

3. Section 14.1 in the Safety Case Requirements guidelines document: This indicates the OSCP should be submitted as an Appendix to the Safety Case. As the OSCP requires separate approval from the IRCG in the first place, IOOA questions the wisdom of introducing a section in the Safety Case that could subsequently change based on feedback/queries from the IRCG - thus potentially leading to a change to the Safety Case. A reference to the OSCP document should be more than adequate and could be provided to CER on request if necessary.

We look forward to discussing these issues with you at the post-consultation meeting.

Yours sincerely,

A handwritten signature in blue ink that reads "P. M. Shannon". The signature is written in a cursive, flowing style.

Patrick Shannon
Chairman, IOOA