



Presentation to the Helicopter Offshore Safety Inquiry

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Agenda

- Incidents
- Complaints
- Safety Audits
- Communications
- Compliance and Enforcement
- Emergency Response



Incident Reports

- Receipt of incident notification
- Receipt of incident reports
- Closure of an incident



Receipt of Incident Notification

- Operator to notify Board of incident
- Internal notification
- Initiate Emergency Response Plan
- Decision to Formally Investigate
- Notification of governments
- Initiate entry into data base

Receipt of Incident Report

- Report required within 21 days of notification
- Review report
 - Completeness including root cause and corrective action
 - Accuracy
- Identify follow-up required
 - During safety audit or inspection
 - Safety Notice
- Enter into data base

Closure of an Incident

- Safety Officer prepares recommendation for Chief Safety Officer
- Close incident in data base



Complaints

- Receipt of complaint
- Review by Safety Officer
- Closure of complaint



Receipt of Complaint

- Information collected
 - Name and address of complainant
 - Operator's and employer's name and address
 - Time and date complaint received
 - Is Collective Agreement in place
 - Statement of complaint
 - Has complaint been discussed with:
 - Supervisor, name of supervisor
 - What action was taken
- Fill out complaint registration form in data base



Review by Safety Officer

- Consult with Chief Safety Officer
 - Decide what level of review
 - Is a formal review or Investigation warranted
 - Assign the review to a Safety Officer
- Safety Officer to prepare report for review by Chief Safety Officer
- Decide on follow-up action
- Update entry in data base

Closure of a Complaint

- Complaint report to be complete and accurate
- Is formal Investigation complete
- Review complete package with Chief Safety Officer
- Advise complainant of disposition of complaint
- Close complaint in database

Safety Audits

- Pre-audit procedures
- Audit procedures
- Post-audit procedures



Pre-audit Procedure

- Set focus and scope of audit
- Review and collate information
 - Safety assessment of authorization
 - Previous safety audit files
 - Current operational activities (daily reports)
 - Regulatory Equivalencies
 - Certificate of Fitness
 - Incident notification and reports
 - Monthly statistical reports
 - JOHSC minutes
 - Conditions of approval



Pre-audit Procedure (cont'd)

- Develop the audit checklist(s)
 - Relevant legislation and guidance
 - Operator or contractor policies and procedures
 - Existing standard checklists
- Review outstanding item from previous audits with initiating safety officer
- Notify operator and make arrangements
- Opening and closing meetings are required
 - OIM
 - Senior Operator Representative
 - Worker representative of JOHSC

Audit Procedure

- Opening Meeting
 - Explain focus and timing of audit
 - Finalize agenda
 - Offer worker representative opportunity to observe audit
 - Discuss closure of items from previous audit
 - Offer to meet with JOHSC
 - Arrange private meeting with worker representative
 - Schedule closing meeting



Audit Procedure (cont'd)

- Verify the completion of items from previous audit
 - Any items not closed must be brought forward
- Meet with Medical Advisor (Platform Nurse)
- Conduct audit against agenda and checklists
- All non-conformances to be documented
 - Observation: objective statements of fact
 - Finding: conclusion
- Closing Meeting

Post-audit Procedures

- Prepare audit report
 - Highlight areas and issues included in the plan
 - Note if conditions of approval were verified
 - Note any follow-up of incidents
 - Note areas of interest not covered in non-conformance report
 - Finalize non-conformance report
- Meet with Chief Safety Officer to discuss audit
- Enter observations and findings into audit summary data base

Post-audit Procedures (cont'd)

- In a meeting provide and review a copy of safety audit report including non-conformance report to operator
 - Request a copy be sent offshore to OIM and JOHSC
- Initial as closed all items from the previous audit on the original of that audit report
- File audit and supporting documentation

Post-audit Procedures (cont'd)

- Review Operator response
 - Corrective actions
 - Completion
 - Enter into data base

- Monitor
 - Corrective actions
 - Completion



Communication

- Daily reports
- Monthly statistics
- Quarterly meetings
- Installation (workplace) JOHSC minutes
- Annual JOHSC sessions
- Annual meeting with CAPP safety committee
- Other regulatory agencies

Daily Reports

- Drilling reports; “Tour sheets”
 - Standard format set by International Association of Drilling Contractors (IADC)
- Production reports
 - Production by well and total
 - Process summary
 - Logistics summary
- Construction reports



Monthly Statistics Report

- Hours worked
- Any reportable injuries
 - Lost Time Injury (LTI)
 - Restricted Work Injury (RW)
 - Total LTI and RW days
- Medical Aid Injuries
- First Aid



Quarterly Meetings

- Quarterly meeting with each production operator
- Review activities for previous quarter
 - Safety performance
- Forecast activities for next quarter and beyond
- Discuss issues of concern



JOHSC Minutes

- Each workplace must have a JOHSC
- We expect them to meet once each rotation
- Minutes of their meetings must be submitted
- Operators must respond in a timely manner
- Minutes reviewed by two Safety Officers
- Entered into Data Base

Annual JOHSC Session

- Began in 2002 with worker representatives only
- Two sessions held over two days (3 weeks apart)
- Formal minutes in recent years
- Opportunity to discuss in multi-workplace forum
- Opportunity for Safety Officers to discuss with workers

Annual Meeting with CAPP Safety Committee

- The Chief Safety Officers from CNLOPB and CNSOPB
- Informal meeting
- Discussion of safety Issues
- Discussion of each parties' priorities



Helicopter Underwater Emergency Breathing Apparatus (HUEBA)

- 2000-2001 Gather information
- 2002 Discussion paper recommends Hybrid device
- 2003 First implementation committee formed
- 2004 Debate on type of system to utilize
- 2005 Training and implementation risk assessment
- 2006 Workshop and new suits
- 2007 Liability and medical issues raised
- 2008 Second implementation committee formed
- 2009 Compressed air system implemented in May



Compliance and Enforcement

- Guiding Principles
- Protocol for Non-Compliance
- Warnings
- Orders
- Suspending or Revoking Authorization
- Cancellation of an Interest
- Prosecution



Guiding Principles

- All Operators must comply with Legislation
- Compliance will be encouraged through effective communication
- All non-compliances must be treated appropriately and rectified
- The Board is committed to enforcing all legislative requirements
- Enforcement action will be carried out in a fair and consistent manner
- Operators will be notified of non-compliance issues within a reasonable time
- Deadlines will be reasonable

Protocol For Non-Compliance

- Seriousness of personal injury or damage
- Whether non-compliance is repeat offence
- Attempts to circumvent the Acts
- History of compliance by alleged violator
- Willingness to co-operate with safety officers
- Existence of other enforcement actions
- Consistency in approach with other Boards



Warnings

- Reasonable grounds to believe a person is not complying with the Act or regulations or a condition of authorization; and
- The suspected non-compliance is not likely to cause serious threat to the safety of workers or serious damage to the environment
- Warning can be issued by any officer without prerequisite of a preliminary report
- Warning is usually issued in writing



Orders

- Order to cease or continue an activity
 - Where the safety officer is of the opinion that the continuation of an activity is likely to result in serious injury, regardless whether a non-compliance is believed to exist
- Order to comply
 - When it appears a person is ignoring a warning
 - To document a remedial action already proposed
- Failure to comply with an order is an offence



Suspending or Revoking Authorization or Operating Licence

- Revocation or suspension of an Authorization or Licence is a decision of the Board where there is a failure to comply, contravention of or default in;
 - Requirement, approval, fee or deposit
 - Requirement undertaken in a Declaration
 - Notification of change from original declaration
 - Valid Certificate of Fitness
 - Financial responsibility remains in force
 - Any applicable regulation

Cancellation of an Interest

- Where the CSO is of the opinion that there exists non-compliance in relation to safety, the CSO may recommend to the Chairman that the operator's interest be revoked or suspended. Before effecting any such revocation or suspension, the Board shall facilitate a 'show cause' process allowing the operator to demonstrate why such revocation or suspension should not occur, at a hearing conducted by the Oil and Gas Committee.
- Any action taken by the Board in this regard however, is a fundamental decision

Prosecution

- The gravity of the offence;
- Whether other remedies would be available and preferable;
- Whether an offence can be clearly identified (i.e. the grounds upon which the offence is believed to have occurred);
- Whether the burden of proof on the Board is likely to be met;
- Whether it is in the public interest to proceed with prosecution;
- The consequences (i.e. time, cost, benefits, harm) of prosecuting; and,
- The likelihood of success having considered all relevant factors.



Emergency Response

- Roles of Officers
- Category One Response
- Category Two Response
- Category Three Response



Roles of Officers

- Chief Safety Officer (CSO) and Chief Conservation Officer (CCO)
- Duty Officer
- Onshore Liaison Officer
- Manager of Public Relations
- Manager of Environmental Affairs
- Environmental Officer
- Geo Scientists
- Manager of Support Services (Administration and IT)
- Manager of Legal and Land

Category One Response

- Provides for monitoring the Operator's response to an emergency situation and does not involve intervention by the C-NLOPB. It is intended to ensure that the CCO and the CSO and other government departments are apprised of developments. The CSO takes the lead during a Category One emergency situation.



Category Two Response

- Response is associated with an environmental emergency situation where intervention by C-NLOPB is necessary to partially or completely manage the operator's environmental protection or restoration activities during the emergency situation. If the operator's response is deemed to be adequate, Category One applies. The CSO takes the lead during a Category Two emergency situation.

Category Three Response

- Response is associated with the safety and other matters, on their own or in addition to environmental matters where intervention by the C-NLOPB is necessary to provide direction to the operator during the emergency situation. If no direction to the operator is necessary, Category One applies. The CSO takes the lead during a Category Three emergency situation.

THANK YOU
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