

# Safety expectations from the Safety Regulator

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# Overview

- Obligations
- Contractor Management
- Behaviour
- Inspectorate Expectations and Initiatives
- Enforcement Policy



## Legislative Framework - Managing the Risk

- *Petroleum and Gas (Production and Safety) Act 2004*
- Outcomes performance based legislation requires risk to be “as low as reasonably practical” (ALARP).
- Safety Management Plan – A DYNAMIC SYSTEM!
  - Identifying the risk
  - Controls in place against identifying risks
  - Hierarchy of controls vital (elimination, barriers preferred over procedures)
  - Reviewing, monitoring, investigating and constant improvement of safety system is vital.



## Operating Plant – Rigs and Wells

- Both the well being drilled and the rig drilling the well are operating plant
- Drilling rig operator must have and implement a SMP
- CSG operator (well operator) must have and implement a SMP
- Site Safety Managers (SSM) for each separate plant
- SSM must be able to discharge obligations



# Operating Plant – Rigs and Wells

- S675 (1) (f) - Plant/Contractor interaction
  - Interactions and risks are identified
  - There is joint involvement in risk assessment, and control and development of operating procedures where operations overlap or interact
  - Clear identification of which systems and procedures to be used eg induction, permit to work, reporting incidents
  - Responsibilities of all operators/contractors are clearly identified, documented and communicated.
  - Principal has access to records/documentation



# Contractor Management

- Majority of workforce are contractors
- Vast majority of incidents involve contractors
- Responsibilities for both CSG Operators and contracting companies
- Parties must understand obligations
- Training/competency records
- Pre evaluation, Audit and review



## Culture/Behaviour

- Can be many causes to incidents
- Issues with design, systems, procedures, supervision, training
- But why do people put themselves in harms way?
- Are they identifying and understanding risk?
- What can we do to address this?
- Are we learning from incidents?



# Inspectorate Expectations

- SMPs in place and implemented (dynamic living safety system)
- SMPs compliant with legislation (use our SafeOp self audit tool)
- Risk management ingrained throughout the system
- Asset integrity/process safety approach vital
- Currency of procedures and change management
- Issues/problems – identify/acknowledge and discuss with Inspectorate early
- Proactive improvement – Inspectorate shouldn't be mechanism for finding faults





# Incident Reporting - issues

- “High Potential” – immediate by phone
- Reporting leaks at plant now required
- WH&S related incidents timelines changed
- Guideline on website updated to reflect changes
- Use 24/7 numbers
- Investigation reports must be thorough, provided promptly and actioned.
- **Still not getting fully compliance re incident reporting and follow up**



## Inspectorate Initiatives –

- P&G Act and Workplace Health Safety jurisdictional guideline – coming soon
- SafeOp audit tool update – coming soon
- Other Codes of Practice
  - Well control
  - Hazardous zones for drill rigs
- Drilling Safety Workshop
- Outcomes/learning's from investigations?



# Three Tier Enforcement Policy

<http://mines.industry.qld.gov.au/safety-and-health/petroleum-gas-safety.htm>

1. Constructive Guidance
  - Advice
  - Guidelines/Codes of Practice
  - Meetings
2. Statutory Notices
  - Issues Directions/Notices
3. High Level Sanction
  - Compliance meetings at senior levels
  - Dangerous situation notice
  - Prosecution (strong penalties)

# Ultimately it's up to you



## More Information:

- Website:
  - [www.deedi.qld.gov.au](http://www.deedi.qld.gov.au)
  - (petroleum and gas safety pages - <http://mines.industry.qld.gov.au/safety-and-health/petroleum-gas-safety.htm>).
  - [www.lng.industry.qld.gov.au](http://www.lng.industry.qld.gov.au)
- Follow us on [Facebook](#) and [Twitter](#)!  
[Safety alerts](#) are also available on Twitter.
- For any safety concerns or issues, contact the P&G Inspectorate via [gassafe@deedi.qld.gov.au](mailto:gassafe@deedi.qld.gov.au)
- Emergency numbers:
  - SRO 0419 888575 CRO 0418 888575
- Telephone: 3237 1626.