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The Safety Case for a New Generation

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INTRODUCTION:

- › “I RECOGNISE THE STEPS THE INDUSTRY HAS TAKEN TO REDUCE THE OVERALL NUMBER OF HCRS, HOWEVER THERE HAVE BEEN SEVERAL SUCH RELEASES IN RECENT YEARS THAT HAVE COME PERILOUSLY CLOSE TO DISASTER”.
 - › *Chris Flint, Head of HSE Energy Division, April 2018.*

HSE VIEW ON CAUSE OF RELEASES:

- › IN GENERAL TERMS:
 - › "Typically because there have been failings across the board";
 - › "We often find a lack of leadership, a poor safety culture";
 - › "Evidence that weaknesses have existed for some time but haven't been picked up through audit, assurance and review".

ARE HSE CONCERNS OF 2018 ISOLATED, AND UNIQUE TO OIL & GAS SECTORS?

- › **SADLY NOT:**
 - › 1990: CULLEN REPORT;
 - › 1997: STEP CHANGE IN SAFETY INITIATIVE;
 - › 2003: VECTRA REPORT ON SCRS;
 - › 2009: NIMROD REVIEW;
 - › 2011: MAITLAND REVIEW
 - › 2013: LORD CULLEN OGUK CONFERENCE

IF CONCERNS A RECURRING THEME, WHAT ARE THE UNDERLYING PROBLEMS?

- › COMPLACENCY?
- › A FAILURE TO UNDERSTAND THE PURPOSE OF SCR?
- › A BELIEF THAT THE TASK IS TOO GREAT?
- › THE SAFETY CASE REGIME ITSELF?
- › A COMBINATION OF ALL OF THE ABOVE?

The Loss of RAF Nimrod XV230

“A Failure of Leadership, Culture
and Priorities”



Criticisms of the Nimrod Safety Case

- Incompetence
- Complacency
- Cynicism
- Opportunity to prevent the accident tragically lost

“

“The Safety Case regime has lost it’s way. It has led to a culture of ‘paper safety’ at the expense of real safety”



The Nimrod Review (2009)
Charles Haddon- Cave QC

THE SAFETY CASE REGIME

The Case for Safety: UKCS 2018

- Upstream E&P activity highest since 2014
- HSE concern about HCRs
- Effectiveness of safety management

Health & Safety At Work Act 1974

- › General safety duties of Employers
- › Must ensure
 - › *“so far as is reasonably practicable” the “health, safety and welfare” at work of all employees (s.2)*
 - › *“so far as reasonably practicable” that persons not in employment but who may be affected are not exposed to risks (s.3)*
- › Duty is to devise, implement and ensure compliance with a safe system of working



Regulations And Guidance



Corporate Manslaughter

- › Corporate homicide in Scotland
 - › Any work related death in UK
 - › Gross breach of safety duties
 - › Senior management failure
- › Fines “measured in millions”



Offshore Safety Directive (Safety Case) Regulations 2015

- › Changes to Safety Case and Licensing Regimes
- › New definitions of Installation Operator and Well Operator (Dutyholders)
- › New Regulators: OSDR and OGA
- › Operator appointed by Licensees must be accepted by OGA
- › Cannot delegate duties of Licensees

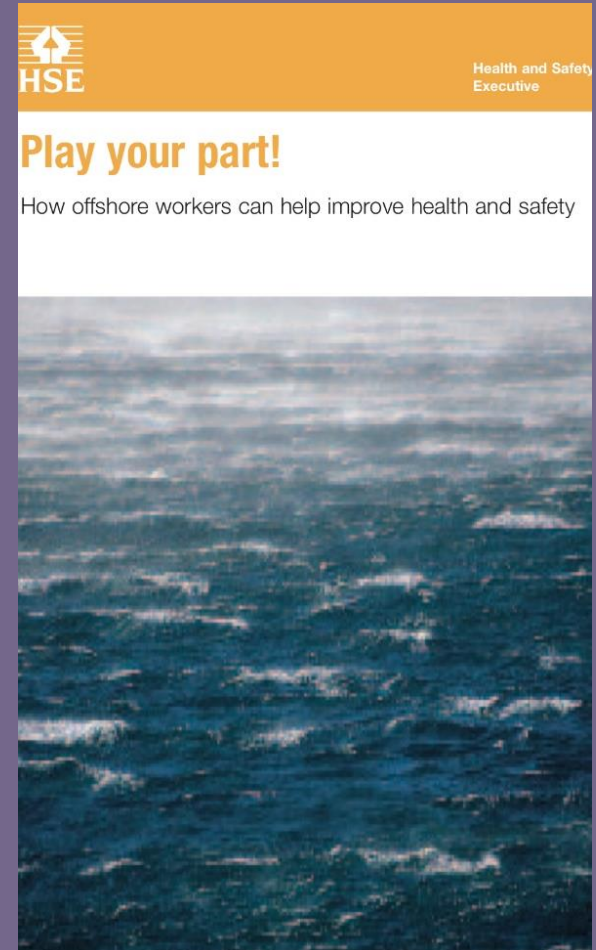


Compliance Processes

- Those who create the risk must manage it
- Reduce risks to a level which is ALARP and acceptable
 - Offshore Installation Safety Case
 - Corporate Major Accident Prevention Policy (CMAP)
 - Safety and Environmental Management System
 - Verification scheme for SECEs
 - Well Examination Scheme
 - Installation MAHA

ARE WE THERE YET?

“A strong health and safety culture offshore means everyone taking responsibility for their actions and playing their part”.



Nimrod: something old – nothing new?

- Do more with less
- Increased outsourcing
- Good track record and confidence in safety
- The few, the tired

Getting it Right?

- The right Safety Case
 - At the right time
 - To the right quality
- Well written, proportionate, technically accurate and flexible
- A new approach?
 - Regulator guidance welcomed by industry

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With us on your side, you won't feel in over your head.

Q/A