

Offshore Helicopter Safety Action Group (OHSAG)

Notes

Date: 15 October 2015
Location: Bond Offshore Helicopters, Kirkhill House, Dyce Avenue, Aberdeen Business Park, AB21 0LQ

Attendees

John McColl (JMc), CAA, Chair
Jonathan Nicholson (JJN), CAA Corporate Communications
Mark Abbey (MA), CHC Helicopter Services
Colin Milne (CM), BALPA
Rebecca Borresen (RB), Oil & Gas UK
Felipe Nascimento (FN), CAA
Steve Harris (SH), Bristow
Michelle Handforth (MH), Bond Offshore Helicopters
Rick Newson (RN), CAA
Jake Molloy (JMol), RMT
Robyn Hathaway (RH), CAA (Secretary)
Les Linklater (LL), Step Change in Safety
Tommy Campbell (TC), Unite

Apologies

Rob Bishton (RB), CAA
Chris Allen (CA), Step Change in Safety
Alan Corbett (AC), Bristow Helicopters Ltd
John Taylor (JT), Unite
Mark Swan (MS), CAA

Date of next meeting: 26 January 2016 (Location tbc)

Closed Actions:

Action ID	Action	Update
8.1	JMc to speak to Dave Howson to become the CAA focal point for pilot EBS.	Closed. John McColl asked Dave Howson to lead on this activity and Dave had indeed been leading on this work. A new action was raised associated with EBS as part of a discussion on training requirements.
8.2	JJN to draft a press release regarding the consultation on proposals for the certification of helidecks. RH to email group once the consultation has been published.	Closed. Consultation details emailed to all 11 May. Press release also published on 11 May.

Action ID	Action	Update
8.3	FN to check with Kevin Payne regarding whether there is anything within the ICAO Aerodrome Annex regarding NUIs.	Closed. There is currently nothing within Annex 14 Vol. II regarding NUIs. ICAO are introducing the terms PAI (Permanently Attended Installation) and NPAI (Not Permanently Attended Installation) into the supporting guidance material for helidecks, which is anticipated to be published in 2016.
8.4	JJN to share the draft press release with the group and press teams for comment before publication.	Closed. Press release for NUI decision published in April.
8.5	FN to convene a sub group of the OHSAG to implement the recommendations from the Cranfield report.	Closed. Meeting held with NUI operators on 17 June to clarify doubts on the CAA's proposed way forward, which is supported by the Oil & Gas industry. Meeting held with Airbus helicopters held on 18 Sept to clarify some areas of the proposal. Tech OHSAG sub-group to reconvene to ensure the assumptions of the bow tie are valid, especially with regards to Human Factors.
8.6	RH to forward a copy of the NUI firefighting report, CAA proposals, bow tie models and presentation to members of the group as soon as possible following the meeting.	Completed on 28 April 2015.
8.7	All to review the communications proposals and provide feedback directly to JJN.	Closed. Feedback received. Further comms to be sent to OHSAG members for comment.

Ongoing Actions

Action ID	Action	Name	Update
7.1	RN to liaise with EASA regarding a meeting between North Sea NAAs and engage with them through the EASA Collaborative Working Group.	Rick Newson	The NAA meeting is planned to take place alongside the Helicopter Research Meeting (HSRMC) w/c 11 Jan 16 at LGW.

New Actions

Action ID	Action	Name
9.1	JMc to speak to Mark Chesney regarding the Co-operative Oversight project and how helicopter operators can be involved.	John McColl

Action ID	Action	Name
9.2	RB to raise risks regarding consistency of application of Safety Directive SD-2015-01 across all operators with the Oil & Gas UK Board.	Rebecca Borresen
9.3	JMc to invite the Norwegian CAA to attend a future OHSAG meeting.	John McColl
9.4	FN and RN to produce a checklist based on the controls within the NUI bow tie, which OHSAG members will use to verify which controls are actually in place.	Felipe Nascimento & Rick Newson
9.5	FN to review wording of the NUI paper to ensure that a clear message on acceptable (and conversely unacceptable) means of compliance is conveyed.	Felipe Nascimento
9.6	RB to forward the UK CAA (i.e. FN and RN) the list of NUI operators currently being served by AH helicopter types.	Rebecca Borresen
9.7	FN to liaise with HCA to ensure that reference to the new NUI requirement is incorporated into HCA NUI plates.	Felipe Nascimento
9.8	RN and FN to develop a visual cueing environment-based tiered NUI classification system and submit it to the OHSAG for endorsement.	Felipe Nascimento & Rick Newson
9.9	RB to liaise with Oil & Gas UK and the HSE to discuss the issue regarding high fidelity training on EBS and the diving at work regulations.	Rebecca Borresen
9.10	JMc to draft and circulate a problem statement on the EBS issues, to include potential solutions.	John McColl

Notes from the meeting

JMc welcomed the group and introductions were made.

1. Review Actions from previous meeting

Actions 8.1, 8.2, 8.3, 8.4, 8.5, 8.6 and 8.7 from the previous meeting were closed.

Action 7.1 remains open. RN provided an update regarding foreign operators applying CAA Safety Directive SD-2015/01, and how all operators and NAAs could work in collaboration to ensure consistency across the offshore helicopter sector. JMc mentioned an internal CAA project regarding co-operative oversight and agreed to speak to Mark Chesney regarding this. It was agreed that the issue would also be raised with the Oil & Gas UK Board, and RB agreed to take this as an action.

Action: JMc to speak to Mark Chesney regarding the Co-operative Oversight project and how helicopter operators can be involved.

Action: RB to raise risks regarding consistency of application of Safety Directive SD-2015-01 across all operators with the Oil & Gas UK Board.

As part of action 7.1 there was a discussion on whether the Norwegian CAA or a Norwegian Operator building up work in the UK should be included at the OHSAG. The issue was raised by Mark Abbey and John McColl agreed to consider this.

Post meeting note, John McColl will invite the Norwegian CAA to attend the meeting where the CAP 1145 update report will be debated, as this will include the further purpose and scope for post CAP 1145 meetings.

Action: JMc to invite the Norwegian CAA to attend the January OHSAG meeting.

2. Review CAA Progress against Actions

FN provided the group with an update on the work carried out on the NUI Firefighting Protection since the last OHSAG meeting. FN highlighted that very good progress had been made and we were approaching consensus, some further work re the detail was still to be completed.

Key points were:

1) Bow tie controls – the assumptions on existing operational controls other than those associated with an engine failure need revision and validation by the OHSAG members. The UK CAA will prepare a check list which industry (i.e. helicopter and NUI operators) will use to verify the extent to which the operational controls assumed to exist actually exist in practice. This is important to ensure that all branches of the bow tie are adequately covered.

Action: FN and RN to produce a checklist based on the controls within the NUI bow tie, which OHSAG members will use to verify which controls are actually in place.

2) Paper and bow tie release - OHSAG members have agreed that the paper may be released to extra-OHSAG parties which have manifested an interest in the new NUI way forward. Ahead of release, it may also be necessary to review the text used in the paper to ensure that the correct message is conveyed regarding compliance versus non-compliance with the solution. Current wording is based upon ICAO risk tolerability jargons, e.g., 'tolerable', 'tolerable with mitigation', 'intolerable' which could be misinterpreted.

Action: FN to review wording of the NUI paper to ensure that a clear message on acceptable (and conversely unacceptable) means of compliance is conveyed.

3) Airbus fleet performance and crashworthiness - FN reminded the OHSAG that the proposed NUI policy is centred on single engine failure accountability, i.e. in the case of a single engine failure on takeoff/approach, demonstrable clearances from deck edge and obstacles/water by 15 and 35 feet, respectively. OHSAG members were also informed of the meeting held between the UK CAA and Airbus Helicopters (AH) on 18 September 2015. OHSAG members are aware of ongoing liaison between the UK CAA and AH.

As per the UK CAA's request, Oil & Gas UK (RB) has agreed to send the UK CAA a list of who is operating the EC225 to NUIs.

Action: RB to forward the UK CAA (i.e. FN and RN) the list of NUI operators currently being served by AH helicopter types.

4) Fire-fighting requirement - OHSAG members aware that Appendix D of CAP 437 (i.e. fire fighting requirement for legacy NUIs) will be withdrawn at the next amendment cycle because CAP 437 is intended to cover newly-built platforms. However, letter of 2011 to industry (authored by UK CAA) will remain valid as it specifies the options of fire-fighting systems which they CAA will accept for credit in the new NUI solution.

5) NUI plates – HCA will be invited to include reference to the new NUI requirement based on

revised conditions to obtain an exposure approval (i.e. PC1/PC2e and/or crash resistant/fire fighting system) into NUI plates.

Action: FN to liaise with HCA to ensure that reference to the new NUI requirement is incorporated into HCA NUI plates.

6) Deadline established to implement NUI of solution in its present format (i.e., based on helicopter performance and crashworthiness) - it has been agreed that a 3 month notice will be given to operators followed by a 3 month implementation period, i.e. hard deadline in 6 months' time, which the OHSAG members have found appropriate as this avoids changing piloting techniques during the dark winter period. Agreed date for full NUI solution implementation: 01 May 2016.

7) Night time flying –The UK CAA (i.e., RN and FN) proposed to start a new work stream. This will involve the analysis of the plates of all NUIs to offer the OHSAG a tiered system (e.g., level 1, level 2, level 3) ranking NUIs by the quality of the surrounding visual environment on approach/takeoff at night (especially with de-coupled AP upper modes). This is intended to create an OHSAG-endorsed baseline to restrict operations where necessary, whilst maintaining a level playing field. RB mentioned that this could lead to an anticipation of a planned voluntary ban on night operations at NUIs by NUI operators, which is currently foreseen to 2018 as NUI operators are not inclined to fit the new H and circle lighting requirements. OHSAG agreed that this may create a logistical issue (e.g., platform maintenance rescheduling needed) to be resolved by Oil and Gas UK which, nevertheless, does not justify continuous unguarded operations to any NUI identified as high risk during nighttime operations. The CAA proposal was endorsed by the OHSAG members.

Action: RN and FN to develop a visual cueing environment-based tiered NUI classification system and submit it to the OHSAG for endorsement.

2.2 Progress Report

JMc reminded the group that CAP 1145 had 32 actions and 29 recommendations, when CAP 1243 was published as the first progress report the actions had reduced to 19 and the recommendations to 18. JMc pointed out that the CAA team had met recently to review the progress and that he could report that good overall progress was being made, many actions and recommendations were on the cusp of being closed, a few are proving more challenging and RN provided a verbal update on the actions. JMc said that it was his plan to publish the next update for April 2016 and will try to provide OHSAG with visibility of the report at the earliest opportunity.

It was confirmed that the report would include EASA's responses to the recommendations, and that EASA had been invited to the next OHSAG to provide an update.

2.3 Recommendation 6 by the Transport Select Committee

The CAA report (CAP XXX) was circulated to the group by correspondence prior to the meeting. JMc briefly introduced the paper and asked for comments. The group discussed the CAA's response to recommendation 6 made by the Transport Select Committee. All agreed that the report was informative, however it was noted that there continued to be a difference between the numbers of reports and that further work was required to identify where the differences were.

CM offered a possible explanation for the difference in that it is common place in the UK to rotors run with the same crew to maximise crew availability for a second flight offshore. The

Norwegians shut down in between sorties and this may precipitate better reporting conditions compared to a less rested crew after 2 offshore flights.

On this basis it was agreed to proceed with publishing the report. Post meeting note, CAA are looking at the data again to ensure it is as representative as possible, if any substantial changes are made it will be re-circulated to OHSAG before publishing.

5. **Review Helicopter Operators' progress against recommendations**

MA raised with the group that the three helicopter operators had chosen to implement two different systems of EBS jackets, which would result in two different sets of training standards. It was agreed that this had been a commercial decision by the operators and should not affect safety.

LL provided a brief update on the results of the passenger size work and that 60,000 workers had been measured, and that Step Change had been asked by other parts of the world to provide support and advice on implementing it elsewhere.

LL also raised an issue with the group regarding the EBS and high fidelity training in relation to the rules imposed for training with diving equipment required by the Health and Safety Executive. Discussion was held on this topic with suggestions for alternative options put forward. It was agreed that Oil & Gas UK would approach the HSE to discuss this point further. In addition, John McColl agreed to assist LL on this matter to clarify the OHSAG position by circulating a problem statement with possible options based upon some information that LL agreed to supply.

Action: RB to liaise with Oil & Gas UK and the HSE to discuss the issue regarding high fidelity training on EBS and the diving at work regulations.

Action: JMc to draft and circulate a problem statement on the EBS issues, to include potential solutions.

Post meeting note: JMc has circulated a paper. Comments have been received and will now plan a meeting with all interested parties. As this is a significant issue for the industry it is important that good progress is made on this before reporting back to OHSAG, as such it has been decided to postpone the January OHSAG by approximately one month so that OHSAG can have the best information on which to make a decision.

6. **Review Oil & Gas industry progress against recommendations**

RB updated the group on the Joint Industry Helicopter Operator Auditing Project.

7. **Stakeholder Engagement Plan & determination of content to brief to Government officials, stakeholders groups and the media**

JJN provided an update on planned engagement.

8. **AOB**

The members of the OHSAG agreed that the communication from contractors (e.g., Oil and Gas companies) needs to improve as it is currently mainly being done tactically. Helicopter operators are at the tail end of the logistics chain and need to reconnect the procurement and operations departments to ensure safety is maintained. This needs improvement. MH suggested that a workshop could be held between all involved to ensure that each party understands clearly each

other's constraints and improve the communications of themes that could impact safety, especially contractual changes, which should be communicated well in advance. JM suggested that all involved should liaise to produce a shared 'principles and values' document expressing the view of the OHSAG regarding redundancies and challenges of the downturn period. It was agreed that this is a matter of leadership of change that needs clarification and publicising.

All operators and members of the group agreed that best practice was to be shared and that close contact should be maintained.

Clarification over who was doing what within the offshore sector was requested as a number of groups were now up and running; a suggestion was made that all groups and companies involved were invited to a meeting to provide the clarity as it was beginning to become unclear.