

Advice provided by the C-NLOPB's Offshore Helicopter Safety Inquiry (OHSI) Implementation Team to the C-NLOPB Board

Advising Document
OHSI Phase I, Recommendation 20
Regarding worker and pilot involvement in
helicopter safety issues



In November 2010, the Honourable Robert Wells, QC, submitted the Report for Phase I of the OHSI to the C-NLOPB, containing 29 recommendations for enhancing the safety of helicopter travel offshore. Each Advising Document contains the text of the recommendation for which the advice is offered.

The Team's advice for Recommendation 20 was accepted in principle by the C-NLOPB Board at their meeting on April 28, 2011. At that time, the C-NLOPB took responsibility for developing its strategy to implement the recommendation.

The OHSI Reports, other Advising Documents, C-NLOPB OHSI Action Plans, and more can be found on the C-NLOPB website: http://www.cnlopb.nl.ca/ohsi_main.shtml

Advice to the C-NLOPB: Recommendation 20

Recommendation

It is recommended that the Regulator develop procedures to involve workers and pilots in the development, implementation, and monitoring of all helicopter safety issues on an ongoing basis.

Method

A working group of the C-NLOPB's OHSI Implementation Team reviewed the recommendation, identified the system safety deficiency, and developed an implementation plan. Of particular assistance to the group throughout this process were:

- "Overarching Issue" #3 and "Specific Issue" #14 from volume 1 of the OHSI Report
- "Governance Models" background data from volume 1, chapter 4 of the OHSI Report
- Research of additional background information on UK/Norway governance structures
- An interview with the Emergency Management Logistics rep. from Mobil North Sea Operations – reviewing Operator participation in helicopter governance structure from the Operator perspective

The working group presented their information to the complete OHSI Implementation Team, and this information became the basis for the Team's proposed implementation strategy that will be considered by the C-NLOPB.

System Safety Deficiency (SSD)

In order to achieve strong safety performance, ensure a positive safety culture, and to ensure the success of the performance-based safety regime, it is imperative that worker participation is solicited.

Other than the current JOHSC structure, there is no formal mechanism that is consistently applied to elicit worker and flight crew participation in the safety aspects of helicopter transport.

Background

Commissioner Wells in his Report wrote about the need for increased worker involvement in the system(s) of safety regulation, stating that our system must have "worker representation up to the highest level of collaborative decision making." Furthermore: "This concept, if adopted, will place a high onus not only upon the Regulator, oil operators, and helicopter operator(s), but on the workers themselves, as individuals and through their representatives" (v. 1, p. 236).

C-NLOPB:

The C-NLOPB has, over the past number of years, held annual onshore JOHSC/Safety meetings for offshore JOHSC members. These meeting have been held to accommodate the schedules of both

Advice to the C-NLOPB: Recommendation 20

offshore rotations. They have involved a somewhat standard agenda, with some variability. They were introduced as a continuous improvement initiative to enable wider engagement with the workforce and the C-NLOPB, based on practices developed in the UK offshore industry. The meetings have been attended by both management and worker representatives from the offshore, along with representatives from the C-NLOPB. They have not involved representation from the helicopter service provider or their workforce, other than to occasionally host a representative to make a special presentation.

Operators:

The Operators have contracted Cougar under separate and distinct commercial service agreements to provide helicopter transport to each of their designated facilities. These separate agreements, while generally consistent in terms of service delivery have no formal linkages: no consistent stewardship mechanism related to operations, safety reporting, audit requirements, etc. Each of the Operators to this point has managed its own relationship with the helicopter service provider, somewhat independent of the others. The Operators have, however, created a “Steering Committee” populated by Logistics and Commercial representatives from each of their operations, along with representation from the helicopter service provider’s management team. This Committee has not been truly formalized and its purpose was solely to provide some degree of common oversight of aviation operations, particularly as regards the pooling of flights and other common service issues. While some aspects of safety were addressed, it has not been engaged in larger issues relating to offshore helicopter transport safety.

Each of the Operators has also established its own varying degree of aviation oversight, each utilizing different levels of expertise in such areas. Some have annual audits conducted by personnel with actual aviation experience; some do not conduct any formalized annual audit of aviation operations. The results of such oversights have not been consistently shared with all stakeholders, especially the offshore workforce.

CAPP:

CAPP has engaged in some aspects of helicopter transport safety such as training requirements/standards. Indeed, it was CAPP that was the intended vehicle by which the HUEBA was first attempted to be rolled out.

CAPP, however, has not been consistent in its involvement in helicopter transport safety and has not had formalized engagement with all stakeholders.

Discussion

Outside of the above referenced elements, there is not now – nor has there been – any formalized, consistent manner in which to share information and/or to engage all stakeholders on safety-specific issues related to offshore helicopter transport. The items referenced above all fall short of what would be considered minimum requirements to ensure full stakeholder engagement. In some aspects of

Advice to the C-NLOPB: Recommendation 20

helicopter transport, there have been inconsistent applications of general polices, with some subtle differences between Operators. Examples include hearing protection, pilot qualifications, cabin freight, etc. While these examples may not directly impact safety, the existence of a seamless and consistent policy for the entire region would cultivate a strong attitude towards safety and allow for the consistent application of safe work practices, especially on shared flights.

In reviewing the operations and governance structures of both the UK and Norwegian industries, it became apparent to the group that these jurisdictions have more interactive models in place, but the structures they employ do not readily lend themselves for use in our region. The group did, however, identify the key features and drivers of their models. Perhaps the single largest difference between the C-NL Offshore and UK/Norwegian industries is their size. While the activity offshore NL is significant, it can in no way compare to the size of those industries. The Steering Committee model that the Team is proposing recognizes this fact. The model takes into account the potential for growth in the NL offshore industry and also the elements that make our offshore industry unique (e.g., small number of operators, a single helicopter service provider, harsh environment, smaller workforce, supply chain challenges due to location, etc.)

The Team endorses the use of a Steering Committee based on the review of engagement models in other jurisdictions, the issues identified in the OHSI documents and the Team's knowledge of the local industry. The Steering Committee concept presents a balanced approach that will provide effective stakeholder engagement. It will achieve the desired results using a model that is easily implemented and easily sustained.

Conclusion

While there has been and continues to be a significant amount of oversight of and administration related to helicopter operations in the C-NL Offshore, there has been no consistent approach to:

- General safety oversight related to helicopter transport
- Identifying and pursuing technological improvements
- Sharing lessons learned or sharing items of general interest related to helicopter transport
- General engagement of all stakeholders

Additionally, there does not exist one *single, dedicated* entity or body that has been charged with helicopter operations and safety concerns. Although individual operators have specific programs with some elements of shared activity and oversight, there is no clear mandate by one entity to represent all stakeholders.

The Team recommends the development and implementation of a single entity with a clearly defined mandate to bring together all stakeholders to enhance helicopter transport safety. Appendix A provides guidance to the C-NLOPB in terms of implementing and sustaining such a committee, under the title of "Helicopter Operations and Safety Steering Committee" (HOSSC).

Advice to the C-NLOPB: Recommendation 20

Appendix A

Terms of Reference for Helicopter Operations and Safety Steering Committee (HOSSC)

Purpose

The purpose of the Helicopter Operations and Safety Steering Committee is to provide a single entity through which the following shall be provided:

- A consistent approach to general safety oversight related to helicopter transport
- A mechanism for the appropriate level of stakeholder participation and engagement
- A consistent approach to sharing lessons learned regarding helicopter transport safety
- A mechanism to address issues/concerns arising from stakeholders related to helicopter transport safety in the C-NL Offshore Area
- Proactive identification and addressing of issues related to helicopter safety in the C-NL Offshore Area
- Identification and fostering of opportunities for innovative technological improvements to helicopter safety in the C-NL Offshore Area

Responsibilities

- Act on behalf of industry within the C-NL Offshore Area to establish priorities with respect to helicopter safety
- Actively work issues and provide recommendations to the Regulator and Operators to implement
- Facilitate actions and closure arising from:
 - Aviation incidents (in conjunction with the responsible oil operator and helicopter service provider)
 - Safety Forums and Safety Conferences
- Provide representation to support the organizing committees for both Safety Forums and Safety Conferences
- Regularly review the status of recommendations from the Offshore Helicopter Safety Inquiry and act as the sustaining force to drive certain recommendations from the OHSI
- Communicate the work of the Committee and all developments in helicopter safety to the workforce
- Develop and promote common aviation practices and consistent application in the C-NL Offshore Area
- Propose mitigation measures to safety issues that arise in the areas of SAR, fleet size, PPE, operational limitations, survival training and any other areas where aspects of helicopter safety operations arise
- Review the Board's annual aviation audits and monitor action item closures
- Solicit input from offshore workforce through JOHSC committees
- Liaise with other offshore jurisdictions for best practices and innovations
- Direct R&D activity in offshore helicopter transportation that has common benefit to the industry

Advice to the C-NLOPB: Recommendation 20

Note: The HOSSC's interest in helicopter operations shall be limited only to those activities that impact helicopter operations safety and/or passenger safety.

Meeting Schedule

The Committee shall meet bi-monthly.

- This meeting frequency shall be reviewed by the committee annually to determine effectiveness. In any event, meeting frequency shall be not less than quarterly.
- Special meetings may be called to respond to specific issues or events.

Membership

Participating Membership:

- Helicopter Service Provider(s) - one each
- Producing Oil Operators – one each
- C-NLOPB – one
- Offshore Workforce (a representative from each installation operating offshore NL – quantity to be reviewed based on actual participations and engagement of installations on shorter term programs such as summer drilling programs)

Note: The Committee shall be chaired by one of the Representatives of the Producing Oil Operators.

The C-NLOPB shall designate a single point of contact from its staff to liaise with other offshore jurisdictions to become aware of their helicopter safety issues and initiatives in consultation with the Helicopter Operations and Safety Steering Committee to bring forward to the Committee and to Safety Forums.

A quorum of participating members shall be determined.

Observers:

- Any Non-producing operator that holds an interest in the C-NL offshore area
- Offshore Contractors & Service Providers – limited to those entities who provide offshore personnel
- Training Providers – limited to those service providers who provide training related to helicopter transport safety
- Helicopter Service Provider workforce, including Pilots etc.

Other technical resources, agencies, or individuals may be invited to attend a meeting where issue-specific information is required.

Note: Participating members may have designated alternates attend meetings in their absence.

Advice to the C-NLOPB: Recommendation 20

Protocols

- All meetings must have minutes taken
- All minutes made shall be made available to all stakeholders
- An action log must be maintained including:
 - Action description
 - Due dates
 - Responsible party
 - Identification of deliverable
- Meeting coordination (minutes, notices, action log), shall be assigned to a specific representative who shall hold such responsibility for a minimum period of 12 months to ensure continuity of recordkeeping

Suggested Agenda

- Review of Previous minutes
- Standing Agenda:
 - Review of recent aviation incidents
 - Review of Airworthiness Directives
 - Review/develop any required external communications
 - Review aviation statistics
 - Review R&D initiatives
 - OHSI recommendations update
 - Review open action items from audits
- New Business (review of items brought forward from JOHSC (including JOHSC input from the “helicopter service provider”, Safety Forums, etc.)
- Review Action Register