

Notes on the Civil Aviation Authority's Offshore Helicopter Safety Action Group (OHSAG)

Date: Thursday 14th August. 9.30am – 12.30pm

Location: Oil & Gas UK, 3rd Floor, The Exchange 2, 62 Market Street, Aberdeen AB11 5PJ

Attendees: Mark Swan [MS] (CAA) -Chair
 John McColl [JM] (CAA)
 Chester Armstrong [CAR] (CAA)
 Luke Farajallah [LF] (Bond Offshore Helicopters Ltd)
 Mike Imlach [MI] (Bristow Helicopters Ltd)
 Lorraine Hodgson [LH] (CHC Scotia Ltd)
 Robert Paterson [RP] (Oil and Gas UK)
 Colin Milne [CM] (BALPA)
 John Taylor [JT] (Unite)
 Jake Molloy [JMO] (RMT)
 Ros Jaeger [RJ] (CAA) - Secretary
 Les Linklater [LL] (Step Change in Safety)
 Gary Cox [GC] (Transport Scotland) - Observer

Apologies: Rob Bishton [RB] (CAA)
 Mark Abbey [MA] (CHC Scotia Ltd)
 Chris Allen [CAL] (Step Change in Safety)
 Jonathan Nicholson [JN] (CAA Corporate Communications)

Date of next meeting: 28th October, CHC Office, Aberdeen.

Closed Actions:

Action ID	Description	Update
2.07	CM to write to MS regarding stated Airprox incident. Update: Ongoing	Closed. Letter sent to CAA
2.10	CAA to investigate what could be done to influence EASA regarding consistency of training.	Closed. EASA have highlighted that they are unable to directly support consistency of other types of training (e.g. passenger) that is not regulated by them. However, some of these requirements are part of the EASA RMT so there may be scope in future when regulations are set by them.
2.11	Present progress on recommendations from the JOR at the July OHSAG.	Update in the 14 Aug notes.

2.17	JJN in conjunction with Step Change to issue a communications plan to the OHSAG. Update: JJN to forward protocol document to OHSAG members.	Completed. Protocol sent. See updated Action 5.3.
4.1	Action: JJN to write Key Comms messages of OHSAG meeting and send to all for review before passing to communications departments Update 25/6/14: Complete	25/6/14: Complete. Keys messages sent.
4.2	Should this issue re EASA label for the life jacket not be resolved soon, JM to ask Massimo at EASA if there is something he can do to speed things up.	Closed: Label issue was resolved and EASA Approval given.
4.3	CM requested whether there is a time period that can be referred to in the SD regarding the wave height as currently BALPA pilots uses a 20 minute window to make judgements.	Dave Howson has responded to Colin clarifying the directive. Colin content with answer.
4.4	It was requested that Dave Howson give a presentation to the OHSAG at the next meeting to give an update on progress against the passenger size (A9) action. Update 25/6/14: Complete. DH will present in August	Complete. See 14 Aug Notes
4.5	CAA to provide a brief at the next OHSAG as to the key issues highlighted and outcome of the SMS symposium.	Complete. See 14 Aug Notes
4.6	RJ (on behalf of MS) to lead in collation of information in order to write a "6 months on" update. (PMN: There was an action in the subgroup which was a way of collating all the progress against actions so we will use this as a vehicle to get updates in order to write the piece)	Closed. Initial information gathered for Tech OHSAG review.
4.7	RB to set up a meeting with O&G UK, the technical experts and unions to move forward on the NUI & related helideck issue. It was suggested that the 21 st July could be a suitable date as the OHSAG meeting is now moved.	The CAA is arranging an independent review to be conducted by an external research establishment. When this is complete, a meeting will be arranged.

New Actions:

Action ID	Action	Name
5.1	MS to invite EASA to a future OHSAG meeting when appropriate.	Mark Swan
5.2	CM to write an article on the Sig Wave Height/wind speed correlation from a real day scenario and CA to send MET information on hurricane Bertha to support this article.	Colin Milne & Chester Armstrong
5.3	MS to enhance the communications plan as necessary	Mark Swan
5.4	LL to lead and work with JJN on completing the comms for passenger size progress	Les Linklater (+ Jonathan Nicholson)
5.5	CA to send ToR for the NUI FFS contract to OHSAG members and add in the request to talk with O&G UK and the unions	Chester Armstrong

5.6	JM to meet with RP to share tools and experience on PBR. (PMN: meeting set for 23 rd September in London).	John McColl
5.7	As of the 1 st September (once all implemented) , LL to work with JJN regarding larger scale Communications	Les Linklater (+ Jonathan Nicholson)
5.8	CA to work with John Steel (Irish NAA) to progress their attendance at the OHSAG.	Chester Armstrong

Notes from the meeting

1. Review actions from previous meeting

JOR Review: Tim Rolfe (JOR lead) requested attendance at this OHSAG. MS declined the request as he did not have an opportunity to confirm with the rest of the OHSAG and hence decided it was not appropriate. (See section 7 for more re JOR and Audits)

EASA: MS commented that Patrick Ky (EASA) was a supporter and we have had positive engagement with EASA to date.

Action: MS to invite EASA to a future OHSAG meeting when appropriate.

Sea State/ Sig wave height.

CM commented how during the tail end of Hurricane Bertha last week, this had been a good opportunity to see a close correlation between the Sig Wave height limitations and the maximum wind speed allowed for flights (in the Central North Sea). Hence from th CNS, this is reassuring from an operator/O&G/passenger view point in that the changes to regulation re Sig Wave height did not have a significant effect reducing flights as flying would have been stopped anyway due to wind speed.

Action: CM to write an article for information to the workforce on the Sig Wave Height/wind speed correlation from a real day scenario and CA to send MET information on hurricane Bertha to support this article.

Communications

MS highlighted that as part of the work that Socia had been doing as looking at the governance of the OHSAG, there could be more done regarding communications.

Action: MS to enhance the communications plan as necessary

Action tracking Spreadsheet:

Feedback that this was not suitable for this forum as too hard to print and read. This sheet was created as an aid to the Technical OHSAG to keep a detailed track of progress and was not meant as a high level overview for the OHSAG.

Progress Report

MS explained that the CAP1145 Challenge team was to reconvene on 22nd October 2014 to review a report which will show the progress against recommendations and actions. This would be an OHSAG report, i.e. have information from all parties and not just the CAA. Hence, requests for written information would be circulated.

2. Presentation on Passenger Size

All agreed that the work completed to date was excellent, very thorough, detailed and had a core scientific basis. The presentation was technical in nature and needed further development, hence would not be shared widely quite yet.

The OHSAG confirmed the principles the working group (CAA, Step Change, JOR) were taking: minimum window size, which body measurements to use (shoulder width) and % of allocated seating needed.

All agreed that an update to workers showing the very favourable progress was required. This could include: minimal seat allocation required, all helicopters have some exits a person of any shoulder width can use and that the body measurements are muscular-skeletal and not "fat". There could also be a reference to how there are already offshore medicals that look at medical fitness..

Action: LL to lead and work with JJN on completing the comms for passenger size progress.

3. SMS Symposium Update

RJ gave an overview of the SMS Symposium held on 2nd July 2014. Presentation text:

The day included

- *CAA Analysis of Offshore Helicopter Safety Data presentation*
- *CAA Operations to Sub 1D Helidecks presentation*
- *Facilitated Table Top Discussions to identify top 10 safety issues*
- *Facilitated Table Top Discussions to agree on the best risk mitigations for the top 10*
- *Facilitated Table Top Discussions on agreeing safety objectives and SPI's for top 10*

The top 10 risks identified by those present were

- *Aircraft Design + OEM Support*
- *Automation*
- *Bow Deck Operations*
- *Fatigue*
- *Helideck Standards (obstacle collision/Fuel/HLO)*
- *Night Operations to Helidecks*
- *Oil + Gas Intrusion (Inc. Commercial Pressure)*
- *Ops to NUIs*
- *Training + Experience*
- *Weather (Inc. Lightning, Weather Information, Visibility)*

These are in no particular order as we did not rate them due to the time available and difficulty in comparing operation and airworthiness issues in terms of priority

The next Steps are

- *It needs longer than one day to capture everything – but this was a good starting point*
- *Consolidated information from the Symposium would be shared with all participants to review and provide feedback*
- *Further work by the operators could be done to further refine the symposium outcomes*
- *A similar exercise with operating pilots and engineers would be a useful exercise if this was thought to be feasible and beneficial?*
- *CAA offered to facilitate the development of a Bow Tie on one of the top 10 safety issues (such as Night Operations to helidecks) with participation and contributions from the operators*
- *Operators are requested to provide more relevant data to CAA safety analysis team related to top 10 safety issues for further analysis.*
- *Final Report to be presented to Accountable Managers for their acceptance and to be used to enhance their SMS*

Comments from the OHSAG included:

There were many other risks highlighted and hence these 10 are based on the combined opinion in the

room and not on evidential basis. I.e. this is a starting point but my no means an end point and each operator may have slightly different 'top tens'.

Next steps need to include a correlation between the top identified risk and ongoing work as a result of CAP 1145. (I.e. have any risks been identified that do not have actions or recommendations to help improve the mitigation of these risks)

The information is subjective and not objective – hence caution needs to be taken in reporting this showing what is opinion vs what is the data showing.

4. Review CAA progress against actions

JM: The technical sub group has been set up and met twice, this is a combined Airworthiness and Flight Operations group. We have had two meetings so far which have been very positive, especially in getting ALL the OEMS much more engaged.

Airworthiness

Of particular note is re A31 and the successful establishment of the maintenance standards groups – now has 4 workstreams with leads from across industry focusing on key improvement area. Discussion will now be expanded to include work around the controlled Service Introductions (CSIs).

Operations

Full details of the individual CAA actions can be found in the tracker sheet.

Training and pilot performance are the longer term actions. There has been strong progress from the OEMS, particularly Airbus in providing details on automation.

The work in the CAA is tied in with wider crew supply chain work across aeroplanes and helicopters.

CM questioned what was being done about rigorous review of 3rd party training. As the rules surrounding this are European wide and not just by a member state, there are wider (not directly heli related) projects going on to address discrepancies in training across Europe.

NUI FFS

The CAA are in the final stages of contract agreement with an independent specialist to review the NUI FFS situation. This would have ~ a 6 week timescale. O&G UK and Unions would be interested in being involved in the work. (I.e. the people doing the work to talk to them).

Action: CA to send ToR for the NUI FFS contract to OHSAG members and add in the request to talk with O&G UK and the unions.

5. Report on EASA progress against recommendations

No updates.

6: Review helicopter operators' progress against recommendations

No updates.

7: Review O&G industry progress against recommendations

O&G UK:

Audits

RP presented on a discussion held on 7th Aug between OGUK, OGP and the JOR.

(Copy of presentation:)

Problem:

- *All agree that there is a right for the customer to audit and this should be to mutual benefit*
- *Current customer audit programme in isolation does not show clear signs of excessive auditing*

- *However they do contribute to the overall audit burden; there is room for improvement*
- *Standardisation and quality of audits needs to be improved*

What does Good look like:

- *Audits focussed on aviation safety (not commercial / customer service issues)*
- *More coordinated audit schedule*
- *Use of the OGP pre-audit questionnaire*
- *Adherence to O&GUK MAO Guidelines (Section 6), including standardised vocabulary (to be revised)*
- *Formalised feedback from helicopter operators to commissioning company, audit team and O&GUK*
- *Long term aspiration:*
 - *Auditing to aligned customer requirements*
 - *Improved standardisation of auditing / accreditation of aviation auditors*

Next Steps:

- *Education / awareness through adoption of a revised O&GUK MAOG Section 6*
- *O&GUK clearing house for coordination of audit planning*
- *Promote and track use of the OGP pre-audit questionnaire – through Heli Offshore, OGP and O&GUK*
- *Revise O&GUK MAO Guidelines (Section 6), including standardised vocabulary*
- *Develop template for feedback on audit execution from helicopter operators to commissioning company, audit team and O&GUK*
- *Long term aspiration:*
 - *Define and agree aligned customer requirements*
 - *Standardise auditing / accreditation of aviation auditors*

LF disagreed with the phase that there was not “excessive auditing” and that the JOR are not accurately reporting the status of activity. I.e. what is the data and information that they are basing their opinion on and that he is happy to provide detailed information on days of audits, resources used etc. LR highlighted that CHC audits had halved in the last 5 years though they were working on ways to reduce the burden e.g. scheduling some at the same time.

A discussion was held by all operators with all agreeing on the wide variation in the quality of audits and how some are useful to the operator and some give no value. Also how 2 different auditors on the same day can give two totally opposing views of the same company which cannot be right.

All agreed that a common consistency and high standard in auditing was required. LF wondered whether we were asking the right questions. I.e. Is it about the number of audits, time, or quality and if we can get the question sorted, this may help.

CM's pilot perspective is that they recognise regulatory requirements & customer need. Pilots want to see standard set of requirements. E.g. Could O&G UK have a central auditing team? There should be one set of safety standards that all operators adhere to and are audited against and then customers can look at delivery of commercial aspects only.

MS discussed that work that the CAA has been doing regarding performance based regulation (PBR) and how we try to reduce the burden on operators whilst also meeting our regulator obligations and offering added safety value to operators. There are a number of tools the CAA have developed that may be of interest to OGUK.

Action: JM to meet with RP to share tools and experience on PBR. (PMN: meeting set for 23rd September in Gatwick).

MS reiterated that the CAA had not seen any evidence that the audits were impeding the safety of operations. There is more work to do in this area of audits.

Commercial Pressures

JT expressed interest in progress regarding commercial pressures on operators. This conversation was taken offline.

MS reinstated that all UK operators had constant oversight and that if any UK operator (onshore/offshore/ fixed wing/rotary wing) was not safe then the CAA has a history and practice of suspension/revocation action.

Regarding foreign operators, although the UK CAA does not regulate them directly (this is done by the member country) the CAA has close working relationships with other NAAs, particularly those with operations in the North Sea and, through conditions of their UK permits, requires copies of all MOR and has the ability to visit their premises at any time and take action if required if they are operating in the UK.

Sub 1 D helidecks

RP raised a question about continuing operations to Sub 1-D helidecks following some rumours he had heard.

CA: The decision on which helidecks the operators fly to is a matter for the helicopter operator since, within aviation regulations, the decision on 'suitability' of a particular 'aerodrome' is theirs.

Within the Review, we undertook to review such situations (A12) and our thinking has been shared with UK operators (presentation attached to minutes). In brief, where a deck does not offer the international/ICAO minimum standard of 1D, a risk assessment may be used that draws a line at a minimum of 0.83D.

Step Change:

Cat A EBS Rollout

LL provided and update on the PSTASS (Cat A EBS) roll out.

- Number of Workers
 - There are 26,000 core workers who regularly work offshore with ~ 16,000 offshore at any one time
 - These form part of a total of ~60,000 people who may travel offshore from time to time. (I.e. some people are trained but may only take a few trips per year)
- EBS Training
 - The minimum training as per the manufacturer is to watch video; however the industry had decided that all personnel should have classroom training in addition to the video. (Dry training)
 - In water (wet) training will be rolled out longer term as part of the full training that people go through (HUET/ BOSIET).
- Initial (dry training) progress
 - 10,000 people trained last week
 - 26,127 so far
 - 30,000 by 15th August.
 - The only exception to the classroom training may be for a small number of people those that have been offshore and need to return to land – they would watch the video under supervision (to prove they had watched it) and then have full training when back on the mainland.

- Feedback on new kit
 - 99% of feedback has been very positive. There has been some negativity about the mouthpiece – mainly from those who are divers. (New mouthpiece is oval and not like that of a diving reg – oval shape for emergency use and easier to attach/detach to jacket with an easy to use nose clip)
- Roll out
 - The first batch is going live on Monday 18th August.
Final batch going live on Monday 1st September after a weekend of prep. There were concerns about the fast turnaround time from obtaining the final kit to flying with it which takes place over a weekend. The team was going to learn from the other roll outs (Scatsca) to de risk the operation.
- Communications
 - Step Change has been issuing weekly updates regarding comms.
 - **Action: As of the 1st September (once all implemented) , LL to work with JN regarding larger scale Communications**

8: Determine content to brief Government officials, stakeholder groups and the media

Key messages surrounding Passenger Size/ Exit and EBS Roll out.

Action: LL to lead with liaison with JN.

9: AOB

Other NAAs

N-CAA have been invited to participate. Currently on their summer break so will update following their return in September

The Irish NAA have put out an instruction that they will adopt 17 of the actions in CAP1145 and they support and endorse the OHSAG. There was a request that they attend a future OHSAG. All agreed this was OK.

Action: CA to work with John Steel (Irish NAA) to progress their attendance at the OHSAG.

OGUK Business breakfast briefing

There is a Business breakfast potentially on the 2nd October. MS and operators to confirm whether they are available.

Date of Next Meeting

The next meeting is 28th October in Aberdeen. Hosted by CHC. OHSAG in the morning. Tech OHSAG in the afternoon.