

OFFSHORE HELICOPTER SAFETY LEADERSHIP GROUP (OHSLG)

Minutes of Meeting – Monday 7 November 2022

Location: TEAMS – 10:00am to 12:00pm

Present:

Matt Rhodes – Co-Chair	Bristow
Andy Thorington	CAA
Mark Wallis	CAA
Richard Naylor	CAA
Harm Bos	CHC
Paul Kelsall	Offshore Helicopter Services
Chris Cooper	NHV
Alan Combe	BP
Colin Cheesewright	Harbour Energy
Grant Campbell	Shell
Steve Rae	Step Change in Safety
Derek Whatling	BALPA
Tim Rolfe	HeliOffshore
Mark Wilson	Offshore Energies UK

Apologies:

Rob Bishton – Co-Chair	CAA
Chris Lawrence	CAA
Mike Gislam	NHV
Douglas Barnes	AAIB
Jake Malloy	RMT (Union)
Shauna Wright	Unite Union
Jamie Carson	Transport Gov. Scotland

1. Welcome and Introduction

Co-Chair Matt Rhodes opened the meeting and welcomed attendees.

2. Agreement of Previous Minutes and Actions

a) June 2022 meeting Minutes were circulated for review and no comments/revisions were required. Minutes of last Meeting agreed and will be published on the CAA website.

b) Actions update;

04-03 Helicopter awareness course, MR/SR offline discussion, action closed.

01-06 Risk management – CAA management outline/presentation, remains open with CL.

02-06 Risk management – action closed, to be covered in main meeting agenda.

03-06 Maintenance Resilience white paper – TR: Paper is under review, a new Technical Director is now onboard who will prioritise, so currently a work in progress. Targeting end of calendar year for white paper to be circulated. Action closed, item to remain on OHSLG agenda as part of oversight engineering resilience item.

04-06 Helideck certification/oversight – to be covered in main meeting agenda.

06-03 Communications– updated and action closed.

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06-06 MMHEL discussion between MW/Cheesewright held, action closed.

Cheesewright commented that MMHEL believed to be run through HTG (Helicopter Technical Group) and not within the ATG. Discussed at Technical Group meeting and Dave Howson (CAA) confirmed this item would be reviewed/managed through the HTG. TR confirmed a working group and discussion is ongoing. Last actions out of the Helideck working group; trials were being looked into, one in GOM and discussion held with MW on finding an operator in North Sea to do the trial of the MMHEL in North Sea.

ACTION 01-11: TR and AC to discuss offline and identify gaps, which groups in place, etc and keep up the momentum of the MMHEL. TR will defer to new Ops Director Jim Evans who will lead.

07-06 MR to approach HTC/Chair of Committee to request representation attendance and will feed back to MWilson/CC – action closed.

08-06 ASTG minutes distribution, actioned and closed.

ASTG / HTC minutes have been circulated. Going forward MW will send to DA and for distribution to OHSLG group.

09-06 Life Jackets Automatic Calculation

The item was discussed and raised at the HMLC, broad agreement that other companies will look into it. Action closed. CCooper will raise item again at next HMLC.

10-06 Windfarm ASR Observations

MR reiterated on the issue of illumination of windfarms and creation of new windfarms that ASRs remain an ongoing item for all parties to ensure any ASRs are reported to CAA. Action closed.

Standing Items

a) Risk management

Primarily focused around maintenance resilience and engineering issues identified. The initial risk picture for UK O&G operations identified 3 items; engineering, flight operations and ground operations. Flight Operations generally in hand, Ground Operations through CAP 437 and introduction of Appendix K and to be kept as a listening watch. Primary focus is on engineering, A31 group stalled, can we suggest a different direction is taken to achieve goal of improving maintenance resilience?

Summary:

- MWallis commented that the CAA gather risks from intelligence surveys and that is entered into CAA (Pentano) risk system and from CAA perspective agreed that something similar to A31 is required to highlight risks that both industry and regulators can work together on to address requirements and changes. Both AC and MW highlighted the need for a working group(s) to be consolidated and reporting identified issues into the OHSLG, these set of issues being prioritised, resolved and in turn effected. MR remarked that after reviewing past structures and comparison of UK/Norwegian structures, discussing with the Chair of Hemlock Flight Ops, overall Hemlock does what is needed to do to do from a Flight Ops

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perspective. High level brief can be provided by Hemlock Chair and specific needs from that group can be reviewed with the correct audience to make decisions. This model could be rolled out to other functional areas of our operations; engineering and ground ops. Aligning with MW comments an engineering version of Hemlock could be used, that has all involved focussing on specific risk here in UK driven by UK legislations and input from HeliOffshore and IOGP from the wider industry allowing discussions that follow a similar agenda structure as Hemlock. This could be reported into OHSLG every quarter from an engineering perspective. Final piece is around Ground Ops activity, tying into manifesting, passenger check in, etc. This should sit with HTG / Aviation Safety Compliance Group which almost forms the Hemlock for what in essence is Ground Ops whether being handled through the terminals or handled on the offshore installation. MR addressed AC question on linking the drive up to 690 and suggested it would sit within relevant operational groups (when created). IOGP is represented in OHSLG, the group can discuss, monitor and drive compliance with 690 for the UKCS region. The OHSLG is looking at UKCS to resolve the issues we have here and wider bodies, HeliOffshore, IOGC, etc are looking at bigger picture globally. In summary, consolidate, OHSLG and three work groups underneath using the same agenda structure as Hemlock. Creation of a new map simplified with various meetings, minutes feeding into the agreed structure to target who performs what and feed back to HeliOffshore and IOGP on work done so no re-invention. MR touched on ultimately having the OHSLG agenda also simplified to Intro, Minutes/actions, then Hemlock Engineering, Ground Ops, feedback from IOGP, Step Change In Safety and HeliOffshore hence creating no other actions from OHSLG group other than feeding back into the relevant workgroups. The OHSLG members supported this suggestion. MR concluded that aim would be to get map in place mid Jan 2023, established, chaired and ready to go and any further suggestions/ideas welcomed.

ACTION 02-11: MR to map draft on timelines, agenda structure and how it would feed back to OHSLG and options of how this suggestion could function for review and feedback.

b) Current issues

i) **Helideck certification/oversite**

The CAA has been discussing with various parties the ways forward on helideck certification/oversite items to be covered , i.e. safety management system for Helidecks, how to ensure it is done and how it is held together. Based on conversations the CAA would like to move to more formalised consultation. There is one organisation doing this in the North Sea at the moment. It has to be made possible for competition to happen, whether practical or not. Ideas needed on structure that works not only for Oil companies but also helicopter operators and CAA. CAA will start formal consultation soon and happy to receive any concerns and input.

Summary:

RN acknowledged CChesewright's question on ownership of data plates and certificates and a single central location for all documentation will be part of the consultation. Part of entire discussion is to work out CAA role in auditing whoever is responsible to ensure all parties receive the same standard, a standard acceptable to all including the CAA. Addressing AC question on where parties go for advice if sources of knowledge are splits (currently questions

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go to HCA), RN responded; any parties providing advice would have to be to the same standard and therefore acceptable information would be available from either. AT confirmed that those points have been discussed and from a process perspective, the regulator wants assurance that the function is being carried out in a compliant, safe and consistent manner. CC supported what AC iterated that to lose the central knowledge and understanding on behalf of the heli operators is a key point going forward. MR added; from HCA perspective supporting globally from anywhere around the world, HCA are willing to advise and guide on what is trying to be achieved here in the UK. From CAA view, what is required to give certainty the decks are safe, properly certified, inspections and auditing is taking place to a standard that is acceptable to the CAA within the UKCS. TR concluded there are around half a dozen organisations regionally who all realise that in order to be sustainable they need to take a global approach. If the UK as a region want to protect itself an approval process needs to be there, i.e. you are an approved provider of information, that must come from a forum like this backed by local regulator.

ii) **Brexit**

AT reminded the group that the Service provision will end at the end of December 2022 and changes have been communicated to all parties. The CAA have developed an industry guidance which will be shared with the group on the subject of pilot supply chain born out of complexity of ways to obtain licences. It is a set of criteria allowing a pragmatic way to solve issues for those falling into set criteria. Guidance shows the seven routes to acquiring a UK licence that may help to understand requirements for pilots coming in that don't currently hold a UK issued licence from Jan 1st, 2023. Effectively, if the individual is an experienced pilot that has recent experience as a European licence holder or have previously held a UK issued FCL with a continuous record of LPC there is a relatively easy route through, those who are starting their training course now is different.

AT also advised of an initiative to progress a bill through parliament regarding (revoke, reinstate, replace) that deletes the EU as primary regulation. Depending on final output the work involved will put pressure on DFT legal resources for the next year or so and put pressure on CAA internal rule making capabilities. In terms of the rule making capabilities, the CAA have been requesting in other similar forums to try to ensure our liaison groups consider how they can influence the UK CAA early on items of regulation or policy AMC/GM material in order for items under review with CAA can be aligned with industry. And potentially from privatisation point of view there may be ways of pipelining various rule making tasks differently depending on the value they have. The CAA's view on the value of this may be differ therefore a discussion could be had amongst the group members on how each may be able to contribute towards rulemaking and future policymaking.

Summary:

MR questioned the quid pro quo with EASA from pilot perspective, are they looking at the same 7 simple strands for UK licensed pilots to become European licences? AT clarified that the rules set followed by the CAA needed to make sure that the CAA were not disadvantaging UK AOC's, UK ATO's. This allows credit for theoretical knowledge that has been accrued and depending on route into the market (through ATO) and individual background, there could be no requirement for theoretical knowledge tests or it could be that the ATO does that analysis and provides that training. Or if the individual falls into the two routes they would be required

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to do all of the theoretical CAA exams and that is something that the CAA have put in place. EASA will not follow this as they devolved the licensing to their member states. The CAA are aware that a number of member states have indicated they would also take a pragmatic view, for instance Malta, Ireland and we understand Denmark also. There is no bilateral. MWallis addressed MR question on any issues or concerns around Maintenance, Third Party Vendors and Form 1's confirming that there is more info to come out in the coming weeks, specifically trying to clarify what Form 1's will and won't be acceptable. CAA are busy working in the background with various countries around the world, not necessarily bilateral however the CAA are trying to get as much unification as possible with various different countries. Europe is trickier as dealing with individual states rather than Europe as a whole. AT reiterated to the group that any foreseen issues causing concern should be raised as early as possible. Exemptions need to be based on justifiable reasons. AT confirmed the CAA have various contingency plans in place to address delays.

iii) COVID

MWilson reported there was no news to cover. OEUK continue to monitor the data. Currently there is a weekly average of about 10 CAT C's being flown onshore. OEUK are holding monthly pandemic steering meetings, will continue to do so through the winter and will revisit in spring. Covid barriers specific to aviation will be reviewed at the next OHSLG meeting and feedback into PSG.

iv) Windfarm construction

CChesewright shared data slides with the group; an example of a proposed wind turbine field – 'Does a clearance radius of 900m provide sufficient safety for offshore operations' and image slide on 'Indicative instrument approach procedure with turbines present' and 'ARA Missed Approach & Continued Take-off Profiles'). In the last 6 months Harbour Energy have held discussions on 3 windfarm proposals. CChesewright asked the question, can oil companies get agreement from the CAA and the four heli operators of what the standard is for the clearance radius around a platform, this would eliminate a review being done for every proposal taking up resources and cost. In CChesewright opinion the 900 meters radius offered as sufficient is not enough. Can we have a single consistent product that can be provided to the wind farm planner, owner, operator specifying what exactly is needed around the zone? CChesewright welcomed any thoughts and conversations on this item.

Summary/Comments

- CCooper added this item is top of their risk register and raised question at HMLC working group. Issue is not straight forward as depends on aircraft type, height of turbines, etc and whether the operators are prepared to take any degradation in service. Needs to sit with the operators and we can then advise on what heli operators can and can't do. In agreement that there should be a more formalised approach and it should be led more centrally within Hemlock.
- RN contributed that windfarm encroaching on existing platforms and oil fields is a much bigger issue and should actually go to a political level and it's fundamental that in finding a solution the Department of Energy should hold discussions with the Department of Transport. RN wishes to build the risk registered within CAA system to a point it can be raised at a higher level between the DoE and DfT.

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- The heli operator representatives were in full agreement that the problem is at the top of all heli operators risk register and will become a bigger issue.
- TR mentioned HeliOffshore have some insight to the renewables side and are connected to Gplus and can take an action out from this group. HeliOffshore have a windfarm operations recommended practice that may be an obvious place for this information to go and HeliOffshore will be happy to participate and support. TR also suggested that the group should also get in touch with Renewables UK and bring them into the loop, they have representative with the DfT already.
- MW advised the group that OEUK have connections to Renewables UK and also to Scottish Renewables which can also be utilised. In terms of leverage in what the government wants to delivery, its energy security strategy, it estimates one wind farm per day out to 2030 so the issues need to be resolved quickly.
- CChesewright will forward the slides provided in this meeting to RN to include in case building and discussion with authorities.
- MR concluded that complete alignment is needed, not only from helicopter operators pushing back but also drive from the CAA up to the DfT and from the oil companies to encourage through the DfE.

ACTION 03-11: Three work streams to action and work on this issue to be started, feedback through e-mail to the group and reconvene and discuss at next OHSLG. AC, CC, TR to work this item through IOGP. RN to raise through the CAA to Department of Transport. MW to work through Renewables UK & Scottish Renewables.

v) Helicopter Awareness Course

MR commented that this item sits more with travelling public. MR view is that it would sit with ATG and ASCG/SCiS. MW/SR will attempt to identify firstly if needed or not. Following on, when how and where helicopter awareness material/podcasts etc should be published or made available. SR added it can certainly be reinstated and refreshed if needed fairly quickly.

ACTION 03-11: MR requested MW & OEUK to review and sense check if there is a need for the course.

vi) Visiting vessels – moved from emerging issues to current issues

MWilson OEUK and CChesewright held meeting and initiated slide that is still currently being worked on. CChesewright commented pending points were; how does HCA or who should maintain accountability between 2 years inspections? Other item discussed at ATG and follow up Met Observer and OEUK meet was visiting vessels using the get out clause of Officer of the Watch (who potentially has had no recurrent training) for providing aviation met information to the heli operators. MW indicated this was a work in progress and nothing specifically required from the OHSLG group at the moment. Keep as current issue and MW/CC will report back/update following ATG/ASCG meetings in December.

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Comments/Questions

- Oil company representatives reported that; Shell carry out own audits and find consistent gaps in areas (physical environment certified by HCA is ok but other areas not), Harbour do preaudits of visiting vessels and BP confirmed that it would be of great assistance to oil and gas companies to know the heli operator process. Is it the expectation of the heli operators that oil companies do this? Or is it just to be accepted there is an HCA certificate?
- From CAA perspective it is important that whoever publishes the helideck certificate involves the management system of that deck not just the physical inspection, if the development of a proper management system can be done the certifying body can start doing it themselves. Potentially unrealistic but that is part of what is trying to be achieved in this process. RN commented that CAA are keen not to end up with conflicting workstreams.
- TR commented there has been some work the IOGP has done with HeliOffshore that will shortly to be published and there is some output on what information is required to be passed on new helidecks coming into a region, to all of the operators. There is a framework and agreement already. TR suggested that can be fed into by all groups and review if that works locally or in each region.
- MW – will set up meeting to discuss with TR/Cheesewright. For awareness, OEUK held a first vessel workshop, all vessel operators and O&G operators were included providing a conduit into information there also. The problem is going to get worse as we are already seeing a bottleneck in vessel availability out 2023/24/25, vessels could be coming in from all areas of the world at short notice to meet demand.
- AC commented that BP will share the relevant part of IOGP 690/697 and a bridging document BP are building to make sure that correct items are at the highest level.

ACTION 04-11: Visiting vessels to be kept open and worked through ATG and ASCG and reported back next meeting.

c) Emerging issues

- vii) EASA's Helicopter Underwater Escape #2 project
RN reported the 2 year project will not move fast, it's following on from the project work done two years ago. Coming out of last research was two major factors; the pressure it takes to open emergency exits underwater and the amount of time it takes a full load of passengers to get out of an upturned aircraft. Fleetwood Test House are going to do the work along with the CAA. RN will advise of any updates or new information as and when it arises.

3. Communications

Request from SCiS for Heli operators to make space available for SCiS notice boards etc in the heli-terminal.

CAA website is aligned with what we are doing. Minor website change required, OGUK should now read OEUK.

ACTION 05-11: RN will upload minutes and arrange for change to OEUK. SR to engage directly with all helicopter operator accountable managers of requirements and keep all in loop.

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4. HeliOffshore Update

HeliOffshore have two new members to their team; Global Ops Director Jim Evans and Technical Director Scott Allen.

Two outputs to report (out with UK) – there was a change in the fatal accident rate. Across the globe in offshore helicopter operations there have now been 4 fatal accidents, all relating to loss of control. HeliOffshore are focussing particularly on the last stages of flight on approach to, and take off from, rigs in the offshore environment rather than onshore. Raised for awareness Covid in particular has had an impact on ability to exercise the ERP, if operators have not run ERP exercises recently it may be worth doing so.

Against the context of this increase in accident rate given 2020 was accident free, the IOGP have written to their own members and we have forward to our operators. The letter is around engaging and understanding what are the current challenges that need to be addressed, financial investment is one of the key pillars to maintaining safety performance. TR indicated appreciation of what the IOGP is doing in asking parties to drive conversations with the operator members. All parties in this group have received the letter and HeliOffshore are looking for engagement, to understand what levels of engagement and what is coming out of the conversations that the IOGP are trying to drive with their customer members. In the UK there is a significant amount of non IOGP customers, a similar conversation is needed with those customers as well. The letter has gone out through the Aviation Safety Committee, can we engage the non IOGP customer base via ASC (MW).

Summary

MW confirmed that this would be something to connect with HeliOffshore on, not an aviation network per say but an opportunity to connect with the Health and Safety Managers and the health and safety wider forum that includes representation more than members to promote and raise awareness on this point. TR added for information that Tony Cramp as chair of Aviation Subcommittee is helping HeliOffshore champion and set up a meeting with procurement managers of the IOGP companies. This will take place in the new year (early February). An important conversation to be had with procurement managers to understand the in's and out's of procuring within aviation and address frustrations and expand conversations as far as possible. If we can introduce somebody on the UK side as representative of the non IOGP member company that would be helpful. AC questioned, how is IOGP letters dealt with? Most have input through HeliOffshore and aware letters are due. Does the letter reach the correct contact within the heli operators? All four heli operator representatives confirmed letter received by correct contact. TR informed industry action plan will be published next month.

5. ASTG Update

MW confirmed minutes distributed and will continue to forward these in future.

MR added that as the group looks to move to new simpler structure, OHSLG meeting will follow one month (or 2 – 3 weeks) after the majority of meetings take place. Minutes will be sent to Denise to distribute so all parties are fully briefed prior to OHSLG meetings. MR to plan OHSLG dates and MW will arrange others to suit.

6. Watching Brief

Nothing to report.

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7. AOB

IOGP 690

AC commented, 690 is at the point of publishing another update to 690 and in early Q1 will also produce 697 which will be helideck management. Split between helidecks and 690 for operators and 697 for oil & gas companies. Is there any thought or possibility that we produce a plan from the gap analysis for each operator to advise items managed today and a time frame for the items that will be later? This will only be able to be produced over next 6 months to a year. Clear from this level, 690 will introduce to the North Sea and will have a conformance date that everyone will be aware of. Is that a possibility?

Summary/Comments

- CCooper said they struggle to find which customers are IOGP members and what is the route into IOGP. NHV have done gap analysis and are on second gap analysis version. NHV opinions have been input through HeliOffshore is this the correct route? What is the route in, where the information comes from and how does it get to IOGP? NHV doing through a trade body at the moment. Another complication is trying to comply the contractors, HeliOffshore, IOGP and other auditors. Would be helpful if auditors to accept IOGP as a common standard also. The document is available for anyone to take on as a standard they can use within a contract. AC: it would be useful to know what operators comply with and what they don't in order to all push in the same direction. Will be made clear what has changed and it is small clarifications other than the crew experience where we are trying to move towards.
- GC: We actively engaged with HeliOffshore as the representative body for all operators. Document was circulated through HeliOffshore, several Q&A's held via HeliOffshore before it was published. Document circulated to every heli operator. Started work with OEUK trying to update OEUK guidelines. Is there any plan to get OEUK guidelines to 690? If OEUK guides to be a standard, energy companies to agree to them and IOGP to quote them this potentially closes the gap.
- MW: Plan is next year guidelines will be updated. Looking to support. Definite 2023 deliverable, ongoing conversation welcome on avoidance of duplication across multiple documentation out there.
- MR: First requirement is to ensure all 4 helicopter operators are bridged over latest version and then compare notes where key issues are and how resolved. If there are costs associated with becoming compliant, who is going to cover those costs?

ACTION 06-11: All accountable managers to reach into their business to see where latest bridge is and then regroup once comfortable and completed. Find common areas that we all have same issues with. Challenge may be around how we manage that independently and safely. MR to have conversation with MW, look at key areas and move forward.

MR raised 2 items:

1) Co-chair as OHSLG following conversations with Andy and CAA. Rob tied up, group set up to be led and chaired by CAA but clear Rob challenges with time, etc. CAA will identify new co-chair. No comments or concerns were raised.

2) Common problem across all four helicopter operators is parts availability. Continuing squeeze on supply chain and going to start becoming an issue for all manufacturers. To make everyone in this group aware from a safety perspective, it does have safety implications not only from trying to keep aircraft serviceable but it increases the number of robberies that are taking place within our businesses, added pressure in the event that we have issues with fleet availability, the personnel offshore and how they may be affected.

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Summary

Group consensus was that participation from all angles through IOGP, HeliOffshore, Oil Companies, Heli Operators, OEUK (via BEIS channel) and CAA by means of all parties reporting, highlighting and discussing with OEM's the potential risks, aircraft parts robberies data, failure and removal of critical parts and inability to replace, rising threat of spares unavailability, etc.

Closing comments:

MR will send next meet date.