

Offshore drillers face challenges of initiatives

SEVERAL REGULATIONS affecting offshore operations are moving toward fruition. **Alan Spackman**, IADC's Director-Offshore Technical and Regulatory Affairs, is IADC's principal representative to the **International Maritime Organization** (IMO), a specialized agency of the United Nations dealing with maritime safety and environmental protection. Mr Spackman discusses several of these pending changes and new regulations that could affect offshore oil and gas operations, from helicopter, lifesaving equipment, labor standards and ballast water management.



Alan Spackman

HELIDECK STANDARDS

The International Civil Aviation Organization (ICAO) has identified a need to review and update documents relating to its ICAO Heliport Manual to account for the performance capabilities of modern helicopters and other technological changes. ICAO established a Heliport Design Study Group (HDSG) to review and update the document and there have been suggestions from ICAO that mandatory certification of helidecks to ICAO standards be included in the revised standard.

One of the items ICAO has attempted to do in the past is establish a single uniform ratio of helicopter rotor diameter helideck based on North Sea practices, meaning that helidecks on many MODUs would have to be 25% larger or the helicopters that land on them would have to be restricted to smaller rotor diameter.

Replacing the helideck is costly and presents an unacceptable weight penalty for many rigs and using smaller helicopters isn't feasible.

Additionally, ICAO's Rescue and Fire Fighting Study Group and its Obstacle Clearance Panel are independently reviewing requirements relating to fire

and rescue and visual aids relating to heliports and helidecks.

IADC is concerned due to a historical lack of coordination between ICAO and the IMO on matters affecting the design, operation and ancillary equipment requirements for helicopter operations. The IMO already has prescriptive standards for helidecks in the IMO MODU code.

IADC is supporting the efforts of The International Association of Oil and Gas Producer's Aviation Subcommittee, which has a seat on the HDSG. IADC is also cooperating with API in updating RP 2L and the Gulf of Mexico's Helicopter Safety Advisory Committee in developing a checklist based on the revised RP 2L.

LIFESAVING EQUIPMENT

"For many years IADC has been attempting to get IMO to take a more holistic approach on its procedures for inspecting and certifying lifesaving equipment," Mr Spackman said.

Current IMO procedures take the lifeboat and the parts of its launching system and approve them individually without looking at the complete package to be able to say that the complete system will be operable and maintainable. The IMO Ship Design and Equipment Subcommittee will begin work this year to develop a more holistic approach, an effort that has been given added impetus by a recent fatal incident involving a MODU lifeboat.

"IMO has finally put together a work program that may lead it to certifying a complete lifeboat and launching system package," Mr Spackman said.

"Hopefully, they will consider ergonomics, making certain that a person responsible for operating the lifeboat and launching system can readily undertake the necessary actions to operate the system and verify its performance."

CONSOLIDATING STANDARDS

The **International Labor Organization** (ILO) has launched a major consolidation of the existing body of more than 60 maritime labor instruments into a single

instrument. The objective is to bring the system of protection contained in existing standards closer to the workers in a form that is consistent with a rapidly developing, globalized sector and to improve the applicability of the system. The aim is for greater consistency and clarity, more rapid adaptability and general applicability.

The Governing Body of the ILO has decided to convene a Maritime Session of the International Labor Conference in 2005 to present drafts for formal consideration. A formal work group will discuss, redraft and produce a final document that states what the ILO is proposing regarding consolidation of maritime labor standards.

"One problem with all of these standards is that a number of countries that have signed on to them varies by the standard," Mr Spackman noted. "Some of them are not very broadly agreed to.

"Whether this exercise will prove fruitful, whether they are going to be able to develop something that will actually get the signatures and how they are going to write the offshore industry into or out of it still remains to be seen," Mr Spackman commented.

SUPPRESSING UNLAWFUL ACTS

A fallout from September 11 is a new revision to an existing international agreement that will allow governments to forcefully pursue terrorists in the maritime arena. For example, if a US citizen is killed in a terrorist incident and the US suspects that the persons involved are onboard a vessel, the agreement will provide an umbrella under which the US can work with other parties to the agreement to bring that person to justice.

The planned revisions to the Convention for the Suppression of Unlawful Acts against the Safety of Maritime Navigation, 1998, and its Protocol of 1998 Relating to Fixed Platforms located on the Continental Shelf (SUA Conventional and Protocol), will establish and strengthen procedures under international law to respond to terrorist incidents. A diplomatic conference to adopt the Protocols of the Convention is tentatively scheduled for 2005.

BALLAST WATER MANAGEMENT

A ballast water management code recently adopted by the IMO will require companies to develop and implement ballast water and sediment management plans to prevent the spread of pathogens and non-indigenous species, such as zebra mussels.

On February 13, 2004, the International Conference on Ballast Water Management for Ships adopted the International Convention for the Control and Management of Ships' Ballast Water and Sediments.

The Convention will enter into force 12 months after ratification by 30 states, representing 35% of world merchant shipping tonnage.

"Typically, there has been a requirement of only 15 States and 50%," Mr Spackman said. "By increasing the number of States, it has been made very difficult for the Convention to actually enter into force."

The increased requirement for signatories was an effort by some countries to block the early entry into force of the Convention.

Certain countries believe the IMO has been moving too fast on some conventions and standards and this is particularly disadvantageous to countries with developing economies that have difficulty affording the costs of implementation.

"Unfortunately, this (Convention) was the wrong one to slow down because there are a large number of countries worldwide that recognize the problem and, in the absence of an International Convention, will act unilaterally," Mr Spackman said.

It may take 5-7 years to ratify a Convention even when only 15 states are required. With 30 states, it is likely unachievable.

The challenge for ship owners will be getting those countries that choose to act unilaterally in advance of the Con-

vention entering into force to conform as closely as possible with it.

Under the new Convention, ships are required to have on board and implement a Ballast Water Management Plan approved by the flag-State to IMO standards that will include a detailed description of the actions to be taken to implement the requirements of the Convention and supplemental Ballast Water Management regulations.

Whenever possible, ships should conduct ballast water exchange more than 200 nautical miles from the nearest land and in water depths of at least 200 meters, taking into account the guidelines developed by the IMO.

In cases where the vessel is unable to conduct such a ballast water exchange, an exchange should be as far away from the nearest land as possible but in all cases greater than 50 nautical miles from the nearest land and in water depths equal to or greater than 200 meters. ■