



Department of Energy, Mines,
Industry Regulation and Safety



GUIDE

Bridging documents and simultaneous operations (SIMOPS)

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Reference

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Foreword

Western Australia's work health and safety (WHS) legislation came into force in March, 2022. This resulted in the amendment of the various petroleum Acts and the repeal of the associated regulations so that all onshore and offshore petroleum, pipeline and geothermal energy operations are now subject to the requirements of the:

- *Work Health and Safety Act 2020* (the WHS Act)
- Work Health and Safety (Petroleum and Geothermal Energy Operations) Regulations 2022 (WHS PAGEO Regulations).

A key responsibility for the WorkSafe Group (WorkSafe) continues to be the ongoing risk management and safety requirements for the onshore and offshore petroleum, pipeline and geothermal energy operations. To support these requirements the guides previously developed have been updated to provide support and assist operators to meet their commitments under the WHS Act and WHS PAGEO Regulations.

Application

This Guide is a non-statutory document provided by WorkSafe to assist persons subject to duties under the WHS Act and requirements to conduct audits of the safety management system as prescribed by the WHS PAGEO Regulations.

It has been developed to provide advice and guidance to operators to meet the WHS Act and the WHS PAGEO Regulations requirements administered by WorkSafe.

Who should use this Guide?

You should use this Guide if you are:

- the operator of onshore or offshore petroleum, pipeline or geothermal energy operations under the WHS Act
- responsible for the development and maintenance of safety cases, safety management systems and bridging documentation covering simultaneous operations (SIMOPS).

WHS legislation

Under the WHS Act, the WorkSafe Commissioner is responsible for performing the functions and exercising the powers of the regulator. Each safety document must be submitted for acceptance by the regulator.

WorkSafe assists the regulator in the administration of the WHS Act and the WHS PAGEO Regulations, including the provision of inspectors and other staff to oversee compliance with the legislation.

For facilities outside Western Australian waters, the WHS Act does not apply and guidance should be sought from National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA). If a vessel does not fall under the definition of “facility” in the Act, operators should contact the Australian Maritime Safety Authority and Department of Transport.

No petroleum or geothermal operations can be conducted on any onshore or offshore petroleum, pipeline or geothermal energy operations unless the facility has an operator registered in accordance with the requirements of WHS PAGEO Regulations.

The WHS PAGEO Regulations provided for transitional provisions in relation to facility operators and safety cases in place or submitted before the commencement of the WHS legislation.

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1 Introduction

WHS PAGEO Regulations r. 109

Managing risks to health and safety

This Guide has been developed to provide operators with assistance to meet their obligations for effective bridging and simultaneous operations (SIMOPS) documentation.

For the purpose of this Guide the term “safety case” is used to cover all of the safety documents referred to in the WHS PAGEO Regulations.

The term “facility” covers offshore and onshore facilities and pipelines, including above ground structures.

The objective is to provide clarity to industry on areas of the legislation which may be ambiguous or open to interpretation.

1.1 Aims and outcomes of bridging documentation

The main aims and outcomes of bridging documentation are to provide:

- operators and workers with sufficient knowledge, awareness and understanding of the risks from health and safety hazards and, in particular, the risks from major accident events (MAEs) to be able to manage SIMOPS requirements safely
- a basis for identifying, evaluating, defining and justifying the selection or rejection of control measures for eliminating or reducing risk and to lay the foundations for demonstrating that the risks have been reduced so far as is reasonably practicable
- all parties of SIMOPS with specific and consistent information to ensure the health and safety of the project teams and reach a successful, incident free conclusion to the SIMOPS operations.

1.2 Linked guides

The following guides have been developed to provide information to assist operators with risk assessment, risk management and the development of the formal safety assessment in the bridging documentation:

- *Hazard identification*
- *Demonstration of risk reduction SFAIRP*
- *Human factors fundamentals for petroleum and major hazard facility operators*
- *Human factors self-assessment guide and tool for safety management systems at petroleum and major hazard facility operators*
- *Identification of major accident events, control measures and performance standards*

These five guides together with this Guide form an interrelated suite of information for effective hazard identification, risk assessment and management including identification of MAEs and control measures.

2 Bridging documents and simultaneous operations

While there is no specific provision for bridging documentation and the management of SIMOPS in the WHS Act or the WHS PAGEO Regulations, the legislation requires a safety case to be in force covering all activities taking place at a facility.

It is critical that operators understand what constitutes a SIMOPS and have comprehensive bridging documentation to link the in force safety cases from the individual operations into a single safety management plan (the Plan).

Details of how operators propose to identify and manage SIMOPS, together with the required bridging documentation, should be included in the safety management systems (SMS) within an accepted safety case.

Temporary, short-duration, emergency or one-off operations should be covered under individual SIMOPS and bridging documents. Any long-term or regularly recurring operation should be detailed within the safety case in force for the facility.

In order to minimise the need for safety case revisions and large bridging documents, operators may choose to include a section on construction and SIMOPS in the SMS of the in force safety case, as shown below (the wording is an indication only and should not be considered as a standard inclusion in the SMS).

Indication of content detail for future construction and simultaneous operations (SIMOPS)

Construction

Future construction projects or other SIMOPS on the facility may be conducted under this safety case and SMS.

A suite of project-specific documentation will be developed to support the new construction, including a safety management plan, project-specific emergency response plan, quality plans, audit plans and any other project-specific documentation that is identified as being required. The safety case operation description will be updated to include details of the facility to be constructed and the activities taking place during construction. Upon completion of construction and prior to commissioning the new facility in the operation, the description will be updated to reflect the operations phase.

During the construction phase the construction site will be clearly demarcated and the operator's permit-to-work system will be utilised to ensure site safety is controlled.

For an offshore facility, any major construction work or the inclusion of an additional vessel will be covered under a separate safety case and, where appropriate, a bridging safety management document between the two safety cases will be developed.

SIMOPS and construction

Risk associated with SIMOPS and construction projects shall be identified through risk assessments and any additional procedures or processes associated with these risks will form part of the construction and commissioning procedures.

Where safety systems are identified as being temporarily out of service due to modifications to plant and equipment, the risks associated with any unavailable safety systems shall be identified and procedures included in the construction and commissioning procedures.

2.1 Liaison with the regulator

Operators should liaise with the regulator as soon as possible when a SIMOPS is identified.

Engagement with WorkSafe Petroleum Safety will enable:

- early notification of when and where the SIMOPS is due to take place
- agreement to be reached on whether a bridging document needs to be developed or the SIMOPS will trigger an amendment to the existing safety case in force for the facility.

2.2 Hierarchy of responsibilities

The operator of the host facility will always have ultimate control and responsibility over the SIMOPS project.

In the event that a bridging document is developed to cover the SIMOPS, this will become an annex to the in force safety case covering the host facility. Where the SIMOPS relates to an onshore drilling project or a diving project, depending on the detail contained within the in force safety case, it may also be necessary to annex the bridging document to those safety documents as well.

It will also be necessary to update the safety case to include a reference to the bridging document and summary of the relevant SIMOPS. The bridging document will be subject to the same document control and records management requirements applicable to the safety case.

3 Simultaneous operations (SIMOPS)

SIMOPS can fall into two main categories:

Category 1 – the performance of two or more concurrent operations taking place within a facility, or in close proximity to a facility, where each operation is currently managed under its own accepted safety case.

Category 2 – when the current safety case does not cover all the intended operations required to be conducted within a facility.

Identifying the SIMOPS early and before work commences, will prevent a potential clash of activities which could result in an undesired event or set of circumstances adversely impacting, for example, safety, the environment, assets and schedules.

Examples of Category 1 SIMOPS involving operations covered by separate safety cases are:

- Offshore:
 - Diving – the bridging document in this instance is the diving project plan which is the link between the diving safety management system (DSMS) and the operator’s safety case. The *Development and submission of a diving safety management system: Interpretive guide* contains further details.
 - Drilling programs – involvement of multiple vessels comprising the drilling vessel and support vessels in the vicinity of an offshore facility.
 - Seismic surveys – survey vessels in the vicinity of the offshore facility.
 - Changes to a facility – any changes within a facility constitute a SIMOPS and appropriate bridging documentation needs to be developed.
- Onshore
 - Construction of new facilities – construction of any new facilities that are part of, or adjacent to, existing facilities including pipelines.
 - Modification of existing facilities – any changes to existing facilities which could adversely impact the safety of the operations of the facility.
 - Onshore drilling projects – drilling of additional wells at an onshore facility or the plugging and abandonment of existing wells.
 - Well management – any changes to the number of wells, whether drilling of new wells or plugging and abandonment of existing wells. Bridging documents can be developed with the drilling contractor.

Bridging documents for Category 1 SIMOPS can be developed using the information contained in Sections 4 and 5 of this Guide.

Category 2 SIMOPS are tasks not included in an existing safety case and require a stand-alone plan; for example, using a crane to perform lifting operations. A bridging document in this case would be a lifting plan used to bridge the gap between the in force safety case and the intended SIMOPS.

3.1 Defining a SIMOPS project

A SIMOPS project needs to be clearly defined as early as possible.

Operators must identify and arrange early consultation with all members of a SIMOPS project, including operators of all the facilities or vessels involved, contractors and service providers.

The documented scope of the SIMOPS should include details of:

- who will be involved
- the activities that will take place
- the location
- expected timeframe, including start and end dates and any critical milestones
- any other relevant details such as risk levels and the controls in place to maintain these so far as is reasonably practicable.

A SIMOPS project team can be selected and roles and responsibilities documented. This team will then be responsible for the development of the required bridging documentation.

3.2 SIMOPS documentation (bridging documents)

Bridging documents combine the various individual safety cases into one SIMOPS safety management plan. This document is formatted along the lines of the in force safety cases and in compliance with the regulatory requirements covering the project.

Bridging documents are live documents which may require review and updating during the course of the SIMOPS. Operators should have a system in place to manage this.

The bridging document should identify existing procedures which take precedence across either the whole of the project or, if necessary, during different phases of the project. The need to develop project specific procedures and plans such as audits, quality assurance and procurement should be identified in the bridging document.

An emergency response plan should be developed for the project which can be linked to the existing emergency response plans in place for general operation of the facilities.

Once finalised and approved by the individual SIMOPS parties, the project safety management plan together with the emergency response plan can be submitted to the regulator for review and acceptance.

3.3 Involvement of workers

WHS PAGEO Regulations r. 38
Involvement of workers

Involvement of workers from each of the operators and their contractors and service providers is as critical for SIMOPS requirements as it is for normal operations.

The SIMOPS project team should comprise appropriately experienced workers who can participate in hazard identification and risk assessments for the SIMOPS, as well as identification of suitable procedures to be used and any new documentation that may be required for the project.

For further information refer to the *Guide: Involvement of workers*.

3.4 Hazard identification and risk assessment

WHS PAGEO Regulations r. 107

Specific requirements must be complied with

WHS PAGEO Regulations r. 108

Duty to identify hazards

WHS PAGEO Regulations r. 109

Managing risks to health and safety

Once the scope and activities to be undertaken during the SIMOPS are identified, the project team can arrange for the necessary hazard identification and risk assessment process to take place, the results of which will feed into the formal safety assessment of the bridging document.

This includes the identification of any potential major accident event (MAE) related to the project that has not already been identified during previous assessments for normal activities taking place at the facility.

For further information refer to the *Hazard identification: Guide and Risk assessment and management including operational risk assessment: Guide*.

3.4.1 Major accident events (MAEs)

During the course of the hazard identification and risk assessment processes, the project team must identify any potential MAEs that may occur during the course of the SIMOPS project not already identified during the course of normal day-to-day operations.

This review should also include existing MAEs that have the potential to occur during the course of the project to ensure that the control measures in place are also appropriate for the SIMOPS project.

Details of additional MAEs that are project-specific should be included in the formal safety assessment (FSA) of the bridging document. If the MAE is project specific and completion and close out of the project will remove the threat of this occurrence, this should be documented within the project formal safety assessment.

For further information, refer to the *Identification of major accident events, control measures and performance standards: Guide*.

3.4.2 Human factors

The hazard identification and risk assessment processes also include the identification and assessment of human factors and any appropriate controls. It should include and demonstrate how various aspects of human performance in the areas of prevention, initiation, detection, control, escalation, mitigation and emergency response have been considered when identifying, assessing and controlling for hazards and MAEs.

For further information refer to the *Human factors fundamentals for petroleum and major hazard facility operators: Guide* and the *Human factors self-assessment guide and tool for safety management systems at petroleum and major hazard facility operations*.

4 Bridging document contents

The following sections are indicative content for both the safety management plan and the project emergency response plan. These should be changed and modified to suit the specific requirements of a SIMOPS project.

4.1 Safety management plan

The content of the safety management plan should be concise and, where possible, reference the relevant sections of existing safety cases for detailed descriptions of procedures and tasks to be undertaken to avoid unnecessary duplication. Where a requirement arises for project-specific processes or procedures to be developed, a detailed overview of those areas should be included referencing the project-specific document numbers.

The format of the plan should be aligned with the existing sections of the safety cases, divided into the four key areas of:

- Introduction
- Site description
- Safety management system
- Formal safety assessment
- Emergency response.

4.1.1 Introduction

The introduction should contain an overview of the SIMOPS project including:

- a concise overview of the scope of the project
- names of the participating organisations and their current safety case details (title and document number)
- which of the parties has the ultimate responsibility for all safety, health and environmental management issues that may arise during the SIMOPS
- details of the legislation governing the SIMOPS and any key standards to be adhered to.

4.1.2 Site description

Include a description of the project with location maps showing, as appropriate, the location of offshore facilities, vessels and wells, or onshore facilities including existing wells and proposed new wells as applicable, and proposed construction sites in relation to those facilities.

For existing facilities, the bridging document should include a general overview with a reference to a section of the existing in force safety case rather than duplicate pages from existing documents.

Include details of:

- geographical conditions including, as relevant, possible cyclones, storms, earthquakes
- ocean conditions, e.g. depth, wave and current conditions, seabed stability for offshore operations
- vessel orientation
- layout of existing wells, the well equipment and structural layout for both offshore and onshore operations
- details of hazardous substances and inventories which may impact the project

- safety features and systems in place – this can also be covered with a reference to the particular section of existing safety cases
- drawings showing key equipment layouts, process flows and safety equipment
- links to any other relevant information contained within existing safety cases or in project-specific documentation such as design basis documentation.

4.1.3 Safety management system (SMS)

The SMS within a bridging document should be informative and concise without duplicating large amounts of the SMS included in existing safety cases in force. The aim should be to include details of project-specific requirements and provide links to sections of existing documentation for information on day-to-day requirements being used for the project.

A number of key areas should be addressed within the SMS.

Leadership and commitment

This section should include details of:

- Policy and leadership – covering the requirements of project health and safety, that the respective health and safety policies have been reviewed and confirmed by the project team that their individual policy documents are aligned. If the individual policy documents do not align, then it is necessary to either develop a new project-specific policy, or agree that all participants adopt one of the existing policies for the duration of the project.
- Safety management plan implementation strategy – identify the strategy for implementing the project safety management plan in a manner that will ensure the health and safety of the workers involved in the project.
- Objectives and targets – describe the objectives and targets to be established for the project. Include details of how these will be communicated to workers, the means by which the achievement of each objective and target will be verified and references of procedures and processes in place to support the achievement of these objectives and targets.
- Organisation and responsibilities – establish health and safety and environmental management responsibilities of the project management team, individuals, subcontractors and the project health and safety coordinator. The health and safety responsibilities and individual performance indicators can be described in detail within a responsibilities and accountabilities matrix included as an appendix to the bridging document.
- Project management – use an organisation chart to show the management structure for the project. This chart should include details of the overall responsible senior management team through to the project managers for each SIMOPS party.
- Employee involvement and communications – detail the process to ensure all workers are informed of activities, reported incidents and general health and safety issues through toolbox or pre-start meetings or notice boards. Include details for worker involvement and the opportunity to provide consultation with regards to documentation, hazard identification and risk assessments.
- Election of health and safety representative(s) (HSRs) – outline the process in place for the election of HSRs with work groups covering all areas of the project, and HSR participation and involvement in consultation, any incident investigations and health and safety issues.
- Resources – identify the resources required by the project and how project management will ensure that there are sufficient resources available throughout the project period.
- Human resources, inductions, training and competency – describe the process for identifying the staffing levels and specific skills and competencies required on the project. Summarise the induction requirements to be completed before access to site is permitted, including contractors and third party visitors. Include details of information made available

on the project site to verify individual training completed and acceptable competency levels in the tasks they are required to perform.

- Access to site and site security – provide details of access to the project site, the site security in place and any specific requirements for contractors and third party visitors before they can access the site.

Planning and implementation

This section of the plan should demonstrate those requirements in place for the successful implementation of the project plan and include:

- Hazard identification and risk management – describe the procedure and processes in place for project hazard identification, risk assessment and management, including the types of risk assessment to be undertaken; for example, hazard operability study (HAZOPS), hazard identification study (HAZIDS), and AS/NZS 2885.6 Pipelines – Gas and liquid petroleum, Part 6: Pipeline safety management (covering threat assessments for pipelines). Include reference to the hierarchy of control methods and the identification of potential MAEs.
- Management system documentation, including records management – detail the process in place to collate the required records for the project, and how they will be stored and archived at the end of the project. Include the requirements for document control within the project and how changes to documentation will be notified to workers and contractors affected by the changes.
- Design and construction – include the design process for the project including internal design review, verification and validation. Any proposed design changes that arise during construction must be reviewed, assessed and documented through the management of change process before being put in place. Only the management of work is required in this area – the proposed construction or modification of facilities should be included in the scope of the project at the beginning of the safety management plan. If modifications or construction take place outside the lease/licence area where the bridging document is in force, this should not be included in the bridging document.
- Commissioning – include a brief overview of the commissioning plan for the construction or modifications, including the responsibility of the commissioning manager, the required commissioning procedures, inspections and testing. This should include any pre-commissioning tasks carried out prior to the introduction of hydrocarbons or energisation.
- Handover – provide details of the process in place to ensure the smooth handover of the completed project for easy transition from project to operational mode.
- Management of change – demonstrate there is a system in place to ensure that any proposed changes which may affect the safety of the site are thoroughly assessed prior to implementation. All necessary modifications to the safety systems as a result of change should be incorporated into the project's implementation process. Changes that impact the integrity of the operating procedures of any of the facility's operations or which introduce new safety hazards should be addressed.
- Purchasing and control of material and services – include details of the purchasing and procurement process in place for the project and how the incoming equipment or materials will be checked to verify they comply with the purchase order issued. Identify how substandard or non-compliant goods will be registered and stored prior to being either returned to the supplier or replaced with acceptable items. This section should also include details of contractor management i.e. who is responsible for the contract and ensuring that contract workers are trained and competent for the tasks they are to perform. Include details for the process in place to ensure that plant and hire equipment is checked.

- Safe operating procedures – provide details of the permit to work procedure to be used in the project, all other key safety operating procedures that will be used and the requirements for project-specific job hazard assessments (JHAs). This section of the safety management plan should also include details of the process for non-destructive testing with radioactive substances that may be required on the project.
- Tagging – summarise details of the tagging system to be put in place for the project including “out of service” and “commissioning” tagging.
- Signage and barricades – detail the signs to be put in place to identify the SIMOPS area and where barricades will be required to segregate operations from the project or isolate an area within the facility.
- Management of waste fuel, lubricants and hazardous substances – describe how any waste generated from project operations will be managed.
- Materials handling and storage – include details of how materials will be handled and stored, including movement and control of vehicles and mobile plant, and security of plant and equipment. This section can also detail management of chemical substances including where to locate a list of chemicals and any other hazardous substances stored on site, how they are stored and that safety data sheet (SDS) information is available.
- Workplace environment – include details of housekeeping within the project, procedures in place for the management of excessive noise, atmospheric contamination, dust generation, lighting and ventilation, and provision and use of personal protective equipment. Describe the workplace amenities available, and provision of food and water.
- First aid facilities and access to medical services – describe the facilities on site for the provision of first aid and access to medical services. Include details of external medical or emergency services that are available to the project as required for management of serious injury.
- Emergency response management – summarise the content of the project emergency response plan. Include the chain of command in the event of an emergency, schedule of emergency exercises to be carried out during the project, full title and document number of the project emergency response plan and where it is located, where to find the current list of emergency contact details, communications available during an emergency, and evacuation and muster points.

Monitoring and evaluation

This section describes the various processes and procedures in place for the inspection, testing and monitoring of plant and equipment used by the project, and health monitoring process in place, including fitness for work and drug and alcohol testing, incident and hazard reporting requirements, injury management and return to work, audit and reviews. It should include details of:

- Workplace and site inspections – describe the process and timing for regular workplace and site inspections on the project.
- Plant maintenance and inspection – outline the process that will ensure regular inspection, testing and maintenance of project plant, including tagging of all electrical equipment and the provision and testing of power supply protection for portable electrical equipment through residual current devices (RCDs).
- Pressure testing of pipelines and vessels – detail the process to be used on the project for pressure testing requirements, including suitably trained and competent workers, and appropriate JHAs. This section should also include details for any hydrostatic testing.
- Health monitoring system – detail any medical assessments required by the project and how the health and fitness for work of workers and contractors will be managed. Include details of any drug and alcohol testing to be undertaken during the project and how results

are managed to ensure that no worker who tested positive for drugs or alcohol is permitted on site.

- Incident and hazard reporting and investigation – reference the procedure in place to ensure that all workers are aware that every incident and hazard must be reported within the required timeframe along with the method of reporting and who to report to. Include information of how investigations and any regulatory reporting will be managed and completion of any resultant actions.
- Safety and health information and reports – describe the method for collation of health and safety information relating to the project and the reporting requirements. This should cover any periodic reporting required by the regulator. It is suggested that a list of safety and health KPIs be developed at the beginning of the project that can be used for this requirement.
- Audits, review and continual improvements – describe the audit plan in place for the project and reference this via the document title and number. There should be a management review process in place for periodic review of the results from audits, incident investigations and any other key processes that may impact the completion of the project. Objectives and improvements identified during these processes should be used for continual improvement of projects and operations where relevant.
- Project closeout – detail the process that will be used to close out the project. The process should cover completion and handover of relevant documentation to operations, and completion and submission to the regulator of final validation and manufacturer data records. Include a process for documenting lessons learned during the project and how this will inform other projects.

4.1.4 Formal safety assessment

The formal safety assessment details in a bridging document are similar to those of the safety case and should include the:

- objectives of the formal risk assessment
- methods used during the formal risk assessment, including a copy of the risk matrix
- risk acceptance criteria for the project
- identification of hazards that have the potential to become MAEs
- demonstration that all risks are as low as reasonably practicable
- summary of the results of all risk studies conducted for the project, including document title and number
- hazard register developed for the project which will be reviewed and updated as required following identification of further hazards or additional control measures
- copy of the current project hazard register to be available on site during the term of the project.

5 Emergency response plan

A project-specific emergency response plan should be developed that:

- identifies the various parties to the SIMOPS
- contains the emergency contact details of each of the parties, e.g. name, position and emergency contact number
- includes links to the existing operational emergency response plans
- details the emergency commander, i.e. the person (or position) with ultimate control in an emergency
- details the emergency response team – this should include the positions within the team and the emergency responsibilities assigned to those positions. This information can be a role and responsibility matrix and an organisation chart showing the chain of command during an emergency
- contains examples of emergency scenarios that may occur during the project
- identifies drills and exercises to be conducted during the course of the project
- specifies emergency response equipment available to the project and where it is located
- identifies evacuation routes and muster points for project workers, including alternate routes available
- includes communication systems that are available during an emergency
- contains details of backup power supply and lighting during an emergency.

For further information, refer to the *Guide: Emergency response planning*.

Appendix 1 Glossary

The following terms are defined for the purposes of this Guide.

Key terms	Meaning
Bridging document	Links to an accepted safety case which covers site-specific aspects, such as SMS interface issues and additional hazards and risk assessments
Competent person	A person who has acquired through training, qualification or experience the knowledge and skills to carry out the task. The definition of 'competent person' in the Work Health and Safety (General) Regulations prescribes specific requirements for some types of work such as diving
ERP	Emergency response plan
Facility	<p>Geothermal energy facility – a place at which geothermal energy operations are carried out and includes any fixture, fitting, plant or structure at the place</p> <p>Petroleum facility – a place at which petroleum operations are carried out and includes any fixture, fitting, plant or structure at the place</p> <p>Mobile facility – includes an onshore drilling rig</p> <p>The term facility has been adopted throughout this document to cover offshore and onshore facilities and pipelines including aboveground structures associated with onshore pipelines.</p>
Geothermal energy operation	<p>Means an operation to:</p> <ul style="list-style-type: none"> • explore for geothermal energy resources • drill for geothermal energy resources • recover geothermal energy, or • any other kind of operation that is prescribed by the regulations to be a geothermal energy operation for the purpose of this definition <p>and carry on of such operations and the execution of such works as are necessary for that purpose.</p>
HSR	Health and safety representative. A worker who has been elected by their work group under the WHS Act to represent them on health and safety matters
Inspector	WorkSafe Petroleum Safety inspector
JHA	Job hazard analysis
Major accident event (MAE)	An event connected with a facility, including a natural event, having the potential to cause multiple fatalities of persons at or near the facility
Operator	A person who has, or will have, the day-to-day management and control of operations at a facility and is registered as the operator of the facility under r.22(3).

Key terms	Meaning
Performance standard	A standard established by the operator defining the performance required for a safety critical element typically defining the functionality, availability, reliability, survivability and interdependency of the safety critical element
Permit to work system	A documented procedure that authorises certain people to carry out specific work with within a specified time frame
Person conducting a business or undertaking (PCBU)	A PCBU is an umbrella concept capturing all types of working arrangements or relationships. A PCBU includes a company, unincorporated body or association and sole trader or self-employed person. Individuals who are in a partnership that is conducting a business will individually and collectively be a PCBU. A reference to a PCBU includes reference to the operator of a facility.
Petroleum operation	Means an activity that is carried out in an area in respect of which a petroleum title is in force, or that is carried out in an adjacent area, for the purpose of any of the following: <ul style="list-style-type: none"> • exploring for petroleum • drilling or servicing a well for petroleum • extracting or recovering petroleum • injecting petroleum into a natural underground reservoir • processing petroleum • handling or storing petroleum • the piped conveyance or offloading of petroleum
Pipeline	A pipeline licensed under the <i>Petroleum Pipelines Act 1969</i> as amended or under the <i>Petroleum (Submerged Lands) Act 1982</i> as amended
Safety case	Documented provisions related to the health and safety of people at or in the vicinity of a facility, including identification of hazards and assessment of risks; control measures to eliminate or manage hazards and risks; monitoring, audit review and continual improvement
Safety critical element (SCE)	Any item of equipment, system, process, procedure or other control measure the failure of which can contribute to an MAE
SDS	Safety data sheet
SFAIRP	So far as is reasonably practicable
SMS	Safety management system
SIMOPS	Simultaneous operations
WHS Act	<i>Work Health and Safety Act 2020</i>
WHS PAGEO Regulations	Work Health and Safety (Petroleum and Geothermal Energy Operations) Regulations 2022
Worker	Any person who carries out work for a person conducting a business or undertaking, including work as an employee, contractor or subcontractor (or their employee), self-employed person, outworker, apprentice or trainee, work experience student, employee of a labour hire company placed with a 'host employer' or a volunteer

Appendix 2 Further information

Petroleum safety guidance

Interpretive guidelines

- *Development and submission of a diving safety management system*
- *Development and submission of a safety case*
- *Development and submission of an onshore facility safety case – drilling operations*

Guides

- *Audits, review and continual improvement*
- *Bridging documents and simultaneous operations (SIMOPS)*
- *Dangerous goods and hazardous chemicals in petroleum, pipeline and geothermal energy operations*
- *Decommissioning and management of ageing assets*
- *Demonstration of risk reduction so far as is reasonably practicable (SFAIRP)*
- *Diving start-up notices*
- *Emergency response planning*
- *Facility design case*
- *Hazard identification*
- *Health and safety leading and lagging performance indicators*
- *Human factors fundamentals for petroleum and major hazard facility operators*
- *Human factors self-assessment guide and tool for safety management systems at petroleum and major hazard facility operations*
- *Identification of major accident events, control measures and performance standards*
- *Inspections – Land-based drilling rigs*
- *Involvement of workers*
- *Management of change*
- *Nomination of an operator*
- *Records management including document control*
- *Risk assessment and management including operational risk assessment*
- *Validation requirements*

Australian and international standards

- AS ISO 31000 *Risk management – Guidelines*
- IEC ISO 31010 *Risk management – Risk assessment techniques*
- ISO 17776 *Petroleum and natural gas industries – Offshore production installations – Major accident hazard management during the design of new installations*
- AS/NZS 2885.6 *Pipelines – Gas and liquid petroleum, Part 6: Pipeline safety management*
- AS IEC 61882 *Hazard and operability studies (HAZOP studies) – Application guide*
- AS IEC 61511 *Functional safety – Safety instrumented systems for the process industry sector*

Codes of practice

- [*Mentally healthy workplaces for fly-in fly-out workers in the construction and resources sector*](#)
- [*Psychosocial hazards in the workplace*](#)
- [*Workplace behaviour*](#)

See the WorkSafe website for [approved codes of practice](#) on a range of related topics such as *Managing the risks of hazardous chemicals in the workplace*, *Confined spaces*, *Managing the risk of falls at workplaces*, *Managing risks of plant in the workplace* and *Managing the work environment and facilities*.

Other resources

WorkSafe WA

- [*How to determine what is reasonably practicable to meet a health and safety duty: Interpretive guideline*](#)
- [*Incident notification: Interpretive guideline*](#)
- [*The health and safety duty of an officer: Interpretive guideline*](#)
- [*The meaning of 'person conducting a business or undertaking' \(PCBU\): Interpretive guideline*](#)



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