

Attachment 2

It is challenging to comment on the document as it is incomplete and further information is being developed to complete the document. However, the following comments are offered.

1. Annex 2 should be expanded to include the definition for – fit for purpose, target levels of safety
2. There is no discussion on the acceptable minimum level of safety (other than target levels of safety). The minimum acceptable level of safety should be documented in consultation with the stakeholders. There is considerable discussion on risks to be as low as reasonably practicable. The first check should be to ensure that the risks meet the acceptable minimum level of safety and then and then check that the risks are as low as reasonably practicable.
3. The acceptable minimum level of safety is achieved by complying with the ISO and IMO standards and the regulations.
4. The last sentence of the fourth paragraph of introduction should be changed to “These activities include geophysical operations (such as seismic activities), exploration and development drilling, and the **design**, construction, certification, operation and decommissioning of production facilities.
5. When there is damage/ deterioration, the operator should document that the potential common cause failures have been investigated and requirements, if any, in addition to those in the adopted codes are included in the documentation. Changes to the inspection plan, if needed should be included in the document. The certifying authority should verify and accept the document. The document should further confirm that the acceptable minimum level of safety is not compromised and that the remedial measures ensure that the risks are as low as reasonably practicable. This is needed only when the damage/ deterioration is significant.
6. As far as possible reference should be to the equivalent ISO/IMO standards.
7. The requirement that floating vessels should be classed is good. However, due to the variability in the level of severity of the environment around the world, there are differences in the level of safety embodied in the different class rules. It is important that the offshore boards use requirements that provide a consistent level of safety. Therefore, the vessel class requirements should meet the acceptable minimum levels of safety.
8. How are pipelines captured by certifying authority verification?"