

G9 Offshore Wind Health and Safety Association
c/o DONG Energy UK
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LONDON
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Reference Transfer procedure

For the attention of Benjamin Sykes

Date 9th Feb 2015

Dear Benjamin

**HEALTH & SAFETY AT WORK ETC. ACT 1974
TRANSFER PROCEDURES**

I am writing to you in your capacity of Board Member of G9 Offshore Wind Health and Safety Association. I would request that the content of this letter is brought to the attention of your relevant members and other interested parties.

There has been significant industry discussion, and variance of practice, when individuals transfer from vessels to offshore fixed assets in the wind farm. Inspectors from the HSE's offshore renewable energy team have considered this matter.

If a person was to fall during the transfer process there is a risk of personal injury including, but not limited to, the following:

- Being struck by the vessel and or offshore fixed asset;
- Entanglement with moving parts of the vessel;
- Drowning, hypothermia and/or shock from falling into the sea.

Therefore the Work at Height Regulations 2005 will apply. Regulation 6 states:

6.—(1) In identifying the measures required by this regulation, every employer shall take account of a risk assessment under regulation 3 of the Management Regulations.

(2) Every employer shall ensure that work is not carried out at height where it is reasonably practicable to carry out the work safely otherwise than at height.

(3) Where work is carried out at height, every employer shall take suitable and sufficient measures to prevent, so far as is reasonably practicable, any person falling a distance liable to cause personal injury.

Energy Division

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Line Manager

Mr Russell Breen

- (4) The measures required by paragraph (3) shall include—
- (a) his ensuring that the work is carried out—
 - (i) from an existing place of work; or
 - (ii) (in the case of obtaining access or egress) using an existing means which complies with Schedule 1, where it is reasonably practicable to carry it out safely and under appropriate ergonomic conditions; and
 - (b) where it is not reasonably practicable for the work to be carried out in accordance with sub-paragraph (a), his providing sufficient work equipment for preventing, so far as is reasonably practicable, a fall occurring.
- (5) Where the measures taken under paragraph (4) do not eliminate the risk of a fall occurring, every employer shall—
- (a) so far as is reasonably practicable, provide sufficient work equipment to minimise—
 - (i) the distance and consequences; or
 - (ii) where it is not reasonably practicable to minimise the distance, the consequences, of a fall; and
 - (b) without prejudice to the generality of paragraph (3), provide such additional training and instruction or take other additional suitable and sufficient measures to prevent, so far as is reasonably practicable, any person falling a distance liable to cause personal injury

The above regulation sets out an hierarchy of control, while it is accepted at this point in time, that the means to prevent a fall are not available, this does not mean that the industry and/or individual duty holders should not be working to identify and providing such means.

Therefore HSE's expectation to achieve legal compliance will be that a person is attached to a suitable fall arrest system prior to transferring on to the ladder and will when descending remain attached until transferred back onto the vessel. It is noted that, as with any fall arrest system a residual risk remains. Therefore following a suitable and sufficient assessment of the risk, the transfer process must be part of a safe system of work which details the roles and responsibilities of all involved in the transfer, including:

- Vessel Master;
- Deck hands;
- Technicians;
- Marine coordinators; etc.

The risk assessment and safe system of work should, in addition to providing suitable information, instruction and training to those involved in the transfer process, set out the limitations on transferring including weather, sea states and vessel capability. Additional measures may be required when working in sea states near to the stated limitations.

"Double hooking" (*aka use of double lanyards*) should only be used when the fall arrest system is in disuse and there is an unavoidable need for access.

If there is variance from the above the HSE's Inspectors will challenge the working practice being followed; where appropriate that could extend to enforcement action in accordance with HSE's Enforcement Policy Statement and Enforcement Management Model.

It should be noted that the above is not applicable for vessel to vessel transfers which fall outside of the HSE remit. However there must always be a suitable and sufficient process for assessing the risks in the transfer from vessel to vessel.

If you wish to discuss further please contact me.

Yours faithfully

Trevor Johnson
HM Principal Inspector of Health and Safety