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Reference
HSE Letter 31012023

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Divisional Director
Chris Flint

Date 31 January 2023

Dear Kate,

HEALTH AND SAFETY AT WORK ETC ACT 1974

Following on from previous discussions with HSE's Wind & Marine Team inspectors and Energy Division managers regarding personnel transfer in offshore windfarm construction, I am now writing to you in your capacity as representative for the industry in order that you are able to provide a clear steer for your members and their contractors.

HSE's feedback follows a recent inspection and highlights relevant requirements of the Construction (Design and Management) Regulations 2015 in relation to Client, Principal Designer and Principal Contractor duties at the project design stage.

I would be grateful if you could share with your members the appendix to this letter which outlines HSE's feedback to the industry.

We have a clear expectation that the hierarchy of control is followed to ensure personnel are not in a position of danger and hence we are keen to support safe by design workshops. Our preference is for these types of events to be under the G+ banner, as it further demonstrates the leadership that your organisation is providing to the industry.

If you wish to discuss further, please contact me.

Yours sincerely,



Paul Bradley
Head of Operations Energy Division

Executive**Appendix:****HSE feedback for Offshore Wind Farm developers on important safety considerations for construction projects involving Heavy Lift Vessels (February 2023)****1. Legal requirements**

***The Construction (Design and Management) Regulations 2015, Regulations 4, 9, 11, 13
Management of Health and Safety at Work Regulations 1999, Regulation 4
Work at Height Regulations 2005, Regulation 6
The Lifting Operations and Lifting Equipment Regulations 1998, Regulation 8(1)
Health and Safety at Work etc Act 1974, Section 3(1)***

The Construction (Design and Management) Regulations 2015 (CDM) place specific duties on the Client, Principal Designer (PD), all the other project Designers, and the Principal Contractor.

The Client has contractual control, appoints designers and contractors, and determines the money, time, and other resources available. CDM makes the Client accountable for the impact their decisions and approach have on health, safety, and welfare on the project.

For any project Designer there is an absolute duty when preparing the design to take into account the principles of prevention to eliminate, so far as is reasonably practicable, foreseeable risks to the health and safety of any person working on their construction project.

For the PD, their oversight extends to planning, managing, and monitoring the pre-construction phase, including the work of all the other project Designers, to ensure that, so far as is reasonably practicable, the project is carried out without risks to health and safety. In particular, when design aspects of a project are being decided, the PD must consider the general principles of prevention and identify and eliminate or control, so far as is reasonably practicable, foreseeable risks; this will necessitate the PD working with other Designers involved with the project to achieve this objective.

The Principal Contractor (PC) must plan, manage, and monitor the construction phase to ensure that, so far as is reasonably practicable, the construction work is carried out without risks to health or safety; in particular when design aspects of the project are being decided to plan the various stages of the work, the PC must consider the general principles of prevention and implement them appropriately.

With regard to a recent inspection of an offshore wind farm construction site, HSE have identified some specific activities which highlight the need to apply the principles described above.

2. Personnel transfer

At the project design stage, clients and designers should consider all reasonably practicable means of personnel transfer between barges and other attendant vessels. This should include fixed or motion compensated gangways, fixed staircases, or any other means that eliminates the need to lift personnel and/or reduces the risk of falling from a height.

If it is found that it is currently not technically possible or reasonably practicable to design a gangway or staircase system directly between Heavy Lift Vessel (HLV) and barge, clients and designers should consider transfer to and accommodation on a Service Operation Vessel (SOV) via motion compensated gangway as an alternative.

Other means of personnel transfer, such as baskets and ladders, should only be utilised where it has been found that a gangway and/or fixed staircase are not reasonably practicable. In these cases, the activity should be designed and managed to reduce the number of transfers to a minimum and be performed in accordance with accepted good practice and industry standards.

In order to reduce the number of transfers to a minimum designers should, wherever practicable, substitute equipment and processes on the barge to minimise manual intervention. In particular, equipment and systems are preferred that can be remotely operated from the HLV, this includes items such as the sea fastening and mooring arrangements. Designers should also consider the provision of welfare facilities on the barge to eliminate the need for personnel to return to the host vessel for welfare purposes.

3. Minimising risks to personnel during lifting operations

For lifting operations to or from a barge, unintended movement of the load, loss of control of the load, potential dropped object, and excessive movement of the barge are considered foreseeable hazards to any personnel working on the barge. The most effective way to protect persons from these hazards is to remove all personnel from the barge prior to the lifting operation, whenever it is reasonably practicable to do so. In order to achieve this, designers should consider equipment and systems that can be remotely operated and not require manual intervention from the barge, such as arrangements to release moorings.

If it is not reasonably practicable to remove personnel from the barge before the lift commences, they should be located in a safe place as far from the lift as possible and should not be required to work in close proximity to the lift. For example, the mooring system should be designed such that the moorings can be released at a safe distance from the lift.

4. Reasonable practicability

When considering the practicability of personnel transfer arrangements and safety during lifting operations, designers should follow a robust process which ensures that they consult those with relevant competence, experience, and expertise. Designers should look to investigate and adopt technical solutions, possibly involving innovation, for personnel transfer and lifting operations, such as the remote operation of equipment. If the technology is not quite ready for deployment, its development should nevertheless be encouraged. Where necessary designers and manufacturers of third-party equipment should be consulted as part of the design process. Where a choice is made not to adopt a preferred safer method, it is important that the decision-making process and the information on which the decision was based are recorded appropriately.