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# MAHP Third Party Infringement Project – Contractor Inspection and Feedback

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# 3<sup>rd</sup> Party Infringement Background



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- Regulation 15 PSR 'Damage to Pipelines'
    - applies to operators and 3<sup>rd</sup> parties
  - Ghislenghien July 30 2005
  - PQs
    - could it happen in the UK?
    - what is HSE and the industry doing?
  - UKOPA infringement and loss databases

# HSE 3<sup>rd</sup> Party Strategy



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- Targeted investigation of damage incidents (MAHPs and other significant pipelines)
  - Develop partnership with UKOPA e.g. 3<sup>rd</sup> party damage working group
  - Identify and work with key utility operators and contractors
  - Third Party Infringement Project

# Infringement Project Outcomes

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- HSE raises it's profile on third party damage.
- Construction and utility industries more aware of risks from major hazards.
- Action taken to reduce the risk of a major incident such as Ghislenghien.

# Infringement Project Stages

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1. Securing MAHP Operator cooperation
2. Utility/Contracting Companies Intervention
3. Sector Awareness Raising
4. Site Inspections
5. Shared Learning

# Utility/Contracting Companies Intervention

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- “Key Players” list decided on the basis of data supplied by UKOPA
- HQ visits carried out to ten utility operators and contractors, plus the Environment Agency.
- Progress already made by BT and UU shared.

# Questions Raised by Ghislenghien



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- Training and supervision of site operatives
  - Working/liasing with the pipeline operator
  - Information management between principal contractor and sub-contractors
  - Reporting of near-misses and infringement damage
  - Knowledge of appropriate backfill techniques
  - Major incident emergency plan

# Role of the Client



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- The quality of some pre-tender health and safety plans
  - It was noted by all contractors that a cooperative approach by contractors and pipeline operators was always more effective in solving problems and was more cost-effective.
  - The Transco/contractor alliances are seen as a significant step forward and it is hoped that this would lead to a better partnership approach across the whole industry.

# Role of the Contractor (1)



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- Pipelines Safety Regulations 1996 (PSR) Reg. 15 places a duty on contractors to be able to challenge a pipeline operator's and/or client's information particularly where the quality of the pre-tender health and safety plan is poor or incomplete.
  - Although location information for MAHPs within pre-tender health and safety plans is good.
  - The use of Linesearch was not universal although all the companies visited expressed an interest in adopting it if it fitted their needs.

# Role of the Contractor (2)



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- Most of the companies visited routinely appoint an “underground services coordinator” at both the planning and construction phases of their projects.
  - From the perspective of principal contractor the point was made of the real difficulty in coordinating the activities of multiple utilities contractors.

# Role of the Operator



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- The pipeline operators, when approached, provided accurate information on MAHP locations and provided personnel to advise on and/or oversee works within the easement.
  - Pipeline operators have become increasingly and constructively involved in the design stage of a project around or near an MAHP even when they are not the client for the work.
  - For low and medium pressure gas mains the pipeline operators were significantly less willing to devote resources to either the design or construction phase of a project.

# Further Work



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- An inspection by HSE of various works on or near to MAHPs will be carried out in September and October 2005.
  - A cross-utilities workshop and seminar, entitled “Preventing damages to hazardous pipelines and services”, jointly hosted by NG, UKOPA and HSE will be held on Wednesday 7<sup>th</sup> December at the National Agricultural Centre at Stoneleigh.