

Marine Order 47 (Offshore industry units)

The Australian Maritime Safety Authority (AMSA) has repealed *Marine Order 47 (Mobile offshore drilling units)* and *Marine Order 60 (Floating offshore facilities)*, replacing them with one new document—***Marine Order 47 (Offshore industry units)***.

Background

The new marine order considers advances within the offshore oil and gas industry in terms of the design, functions and capabilities of modern offshore units, and addresses the way in which these vessels are now covered by the *Navigation Act 2012*.

The *Navigation Act 2012* now applies to offshore industry units whenever they are not subject to the *Offshore Petroleum and Greenhouse Gas Storage Act 2006*, that is—delivery voyages (including non-propelled vessels), docking voyages and/or release from the riser to avoid severe weather or operations outside the Australian Exclusive Economic Zone. For example, disconnectable floating production storage and offtake vessels (FPSOs) are required to have valid international safety certificates whenever subject to the *Navigation Act 2012* and associated marine orders for non-SOLAS vessels.

Additionally, SOLAS regulation I/10 and marine order 31 would require inspection of the outside of the ship's bottom twice in every five-year period. Relevant survey guidelines (resolution A.1104 (29) and A.1049 (27)) specify that bottom inspections are to be conducted in drydock, except that alternate inspections (every second one) may be in-water.

This effectively requires drydocking every five years, which is generally disruptive to offshore operations, particularly in the final years of field life.

Performance-based inspection regimes

AMSA recognises this issue, and has been active at the International Maritime Organisation (IMO) in developing guidelines to assist Administrations in adopting a pragmatic approach to applying Convention requirements to FPSOs, floating storage units (FSU), etc. *Marine Order 47 (Offshore industry units)* takes account of IMO resolution MEPC.139 (53) (as amended)—and allows AMSA to consider performance-based inspection regimes (PBI). These are designed to achieve equivalent survey outcomes to the statutory bottom inspection provisions of SOLAS and the enhanced survey programme for oil tankers.

AMSA would expect a PBI proposal to be developed in close consultation with, and endorsed by, an AMSA-approved recognised organisation. A list can be found at amsa.gov.au/flag-state-administration. The proposal will show evidence of extensive assessment and modelling of the vessel's structure and predicted corrosion losses, together with a clearly articulated program for utilising and updating the plan over the life of the facility. This would include provision for escalating inspections and/or management plans for dealing with hull deterioration outside of predictions. The plan should provide assurance to AMSA that the vessel meets Class (registered organisation) and statutory requirements, and so maintains safety integrity of hull, machinery, electrical and control, pumping and piping etc. The plan may be amended by AMSA and/or the registered organisation.



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Should the proposal be approved, AMSA would issue an equivalence under section 7 of marine order 47, providing for PBI surveys to be accepted as meeting the requirements of marine order 31 in respect of renewal and intermediate surveys, and *Marine Order 91 (Marine pollution prevention – oil)* for the issue of an International Pollution Prevention Certificate and associated Record of Construction and Equipment.

Any conditions will be listed on that document. Conditions might include but not be limited to:

- The submission of annual reports to AMSA, endorsed by the registered organisation, detailing the implementation of the plan and any deficiencies found, any conditions of class imposed, the rectification thereof and any variation from the schedules in the plan.
- The vessel remaining in class with the registered organisation and any conditions of class relating thereto shall be dealt with by the due date to the satisfaction of the registered organisation in its capacity as the classification society without extension.
- The requirement for two in-water surveys of the outside of the bottom in each five year period, with a maximum interval between those surveys of 36 months and prior to which the hull is cleaned of marine growth to facilitate the surveys.
- A valid International Load Line Certificate issued in accordance with marine order 16.
- A Certificate of Survey for a Cargo Ship will replace a Cargo Ship Safety Construction Certificate if the vessel has not completed a renewal survey in drydock in the preceding three years as required by SOLAS.
- The application for a further exemption giving effect to SOLAS Regulation I/4(a) prior to the commencement of any overseas voyage within the meaning of the *Navigation Act 2012*.
- A clear statement that the equivalence is void upon breach of any of the conditions.

AMSA recognises that issues for FPSOs, etc. in complying with traditional Conventions extends beyond bottom surveys. For example, davit-launched lifeboats may not be readily and safely retrieved at sea, but are still required by SOLAS to be manoeuvred in the water every three months. Acknowledging that the safety of personnel is paramount, AMSA may consider an equivalent arrangement involving enhanced maintenance checks and annual assisted boat launching as part of the PBI regime.

Continuous survey programmes

AMSA may also consider continuous survey hull (CSH) programmes, as provided for by the Mobile Offshore Drilling Units (MODU) Code. An operator considering a CSH programme must demonstrate to AMSA that all surveyable items are covered by the plan and that all tasks are completed within the five year survey cycle. Any proposal should satisfy AMSA that the extent and frequency of the surveys are at least equivalent to renewal and intermediate surveys required by SOLAS and/or marine order 31. AMSA would expect the plan to demonstrate how inspection schedules/frequencies might be adjusted according to observations, and how any deviations from the expected performance of coatings, structures, etc might be resolved.

Option to use elements of the MODU Code

Some safety measures of the MODU Code may be more appropriate to the configuration and operation of offshore industry units than the corresponding traditional ship requirements, for example fire protection and life-saving appliances. AMSA will work with stakeholders to determine the best outcomes.

Marine pollution

With regard to pollution prevention under MARPOL, it should be noted that fixed or floating platforms are included in the MARPOL 73 Article 2 (4) definition of ship. The provisions of MARPOL are therefore international law for offshore industry units and those requirements are implemented through the Prevention of Pollution from Ships (POTS) Act. These are not affected by the dis-application of the *Navigation Act 2012* by the *Offshore Petroleum and Greenhouse Gas Storage Act*. Consultation between AMSA and the National Offshore Petroleum Safety and Environmental Management Authority ensures the smooth operation of this interface.

For further information, please contact your nearest AMSA office or AMSA Connect on 1800 627 484.