

**THE BUREAU OF OCEAN ENERGY MANAGEMENT,
REGULATION AND ENFORCEMENT
Office of Public Affairs**

FACT SHEET

**THE WORKPLACE SAFETY RULE
On Safety and Environmental Management Systems (SEMS)**

The Bureau of Ocean Energy Management, Regulation and Enforcement (BOEM) will submit to the Federal Register for publication a final Workplace Safety Rule requiring offshore oil and gas operators to develop and maintain a Safety and Environmental Management System (SEMS). A SEMS is a comprehensive management program for identifying, addressing and managing operational safety hazards and impacts, with the goal of promoting both human safety and environmental protection.

The Workplace Safety Rule covers all offshore oil and gas operations in Federal waters and makes mandatory the currently voluntary practices in the American Petroleum Institute's (API) Recommended Practice 75 (RP 75). A mandatory oil and gas SEMS program will enhance the safety and environmental protection of oil and gas drilling operations on the Outer Continental Shelf (OCS), particularly in light of the Deepwater Horizon explosion.

BOEM was preparing to finalize the Workplace Safety Rule prior to the Deepwater Horizon explosion. Following the explosion and resulting oil spill, BOEM continued to carefully analyze the proposed rule, which proposed making mandatory the essential components of RP 75. BOEM has determined that it agrees with comments from some commenters urging BOEM to incorporate all of RP 75. BOEM intends to address additional safety management system provisions considered appropriate in light of the Deepwater Horizon oil spill in additional rulemakings in the near future.

BOEM believes finalizing this Workplace Safety Rule at this time has the following benefits:

- It will provide oversight and enforcement of SEMS provisions. Although many large operators on the OCS currently have a SEMS program, the voluntary nature of the programs limits their effectiveness;
- It will impose the requirement for a SEMS program on all OCS operators;
- It will address human factors behind accidents not reached by current regulations; and
- It will provide a flexible approach to systematic safety that can keep up with evolving technologies.

The 13 elements of RP 75 that the Workplace Safety Rule makes mandatory are as follows:

- **General provisions:** for implementation, planning and management review and approval of the SEMS program.

- **Safety and environmental information:** safety and environmental information needed for any facility, e.g. design data; facility process such as flow diagrams; mechanical components such as piping and instrument diagrams; etc.
- **Hazards analysis:** a facility-level risk assessment.
- **Management of change:** program for addressing any facility or operational changes including management changes, shift changes, contractor changes, etc.
- **Operating procedures:** evaluation of operations and written procedures.
- **Safe work practices:** manuals, standards, rules of conduct, etc.
- **Training:** safe work practices, technical training – includes contractors.
- **Mechanical integrity:** preventive maintenance programs, quality control.
- **Pre-startup review:** review of all systems.
- **Emergency response and control:** emergency evacuation plans, oil spill contingency plans, etc.; in place and validated by drills.
- **Investigation of Incidents:** procedures for investigating incidents, corrective action and follow-up.
- **Audits:** rule strengthens RP 75 provisions by requiring an audit every 4 years, to an initial 2–year reevaluation; and then subsequent 3-year audit intervals.
- **Records and documentation:** documentation required that describes all elements of SEMS program.

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