

urgent amendments to the offshore diving regulations are being held up unnecessarily.

4.5. A subsidiary point of concern has been the arrangement whereby the examinations required by the Life Saving Appliances and the Fire Fighting Equipment Regulations are undertaken by the Marine Division of D/Trade on behalf of D/Energy. The explanation for this arrangement was that Marine Division contributed substantially to the formulation of both sets of regulations and had surveyors available to carry out the work. D/Energy would have needed to take on additional staff to do the job. The criticism of the arrangement is that it leads to a further agency becoming involved, causing an additional inspection load on the installations and confusion in the minds of some as to which agency is in charge of safety inspections.

4.6. Furthermore this arrangement does not follow the logic of the Prime Minister's Statement that HSC/HSE should be responsible for occupational safety and health policy. These two sets of regulations are administered without direct HSE involvement. It is a further example of how the current arrangements for offshore safety have become a tangle of divided responsibilities.

4.7. It is also relevant to draw attention to an international dimension of the offshore safety arrangements. There is a trend for international bodies to attempt harmonisation of national standards and practices, a trend to which the UK subscribes. An example is the development within IMCO (the UN Intergovernmental Maritime Organisation) of standards for mobile offshore drilling units. Traditionally the D/Trade represent the UK Government at IMCO and this has been the case for this latest development. There was consultation with D/Energy on the line to take on the issues related to the mobile unit when in the drilling mode, and occasional representation by Energy officials at IMCO meetings. Nevertheless Trade remained the lead Department and will no doubt continue to be so in any further IMCO deliberations affecting offshore oil and gas operations.

4.8. The picture is therefore quite complicated: there are three Government agencies with responsibilities for offshore safety. There are three Acts of Parliament which apply to offshore operations and deal with safety matters: the 1974 Act with its broad coverage overlaps the specific nature of the 1971 Mineral Workings Act and the 1975 Petroleum and Submarine Pipelines Act. Under the terms of the Agency agreement PED enforces the provisions of the 1974 Act on offshore installations and all diving operations. HSE enforces the Act for pipeline operations excluding the structural integrity matters dealt with by PED under the 1975 Petroleum and Submarine Pipelines Act. PED also enforces the regulations made under the 1971 Act. With HSE and D/Energy having separate policy areas and separate Acts of Parliament to administer, the danger is that separate and divergent developments will take place.

4.9. In Appendix 13 to this Report there is an account of the offshore safety arrangements on the United States' Outer Continental Shelf. There are four principal agencies involved—the US Geological Survey, the Coast Guard, the Materials Transportation Bureau and the Occupational Safety and Health