

15. *Comment.* There is evident overlap between the four principal agencies responsible for safety; the most striking aspect being the superimposition of OSHA notwithstanding the requirements of the existing specialist agencies. The US Coast Guard and the Geological Survey, both agencies within the Department of the Interior, seem to have minimised the scope for overlap and conflict. The decision by the Department of Transportation's Material Transportation Bureau to take into scope offshore pipelines previously and still subject to USGS controls is to us remarkable.

### Norwegian Continental Shelf

16. In Norway there are two predominant Directorates to enforce safety regulations on Continental Shelf operations. For fixed platforms the Norwegian Petroleum Directorate has prime responsibility and for mobile rigs the Maritime Directorate. There are however other agencies, under the aegis of four Ministries, with a regulatory control to exercise and the principal Directorate acts as co-ordinator. The four Ministries are Environment (Pollution), Justice (Rescue Services), Social Affairs (Health & Hygiene) and Shipping & Commerce (Maritime matters).

17. *Norwegian Petroleum Directorate (NPD).* The NPD is responsible to the Ministry of Labour for offshore safety matters on fixed installations, and for co-ordination of other agencies' inspections and controls. These are Maritime Directorate, the Coastal Directorate, the Civil Aviation Authority and the Telecommunications Directorate. NPD is also responsible for the controls relating to drilling equipment and procedure on mobile rigs.

18. The Inspection & Control Department of NPD has the following sections:

- 18.1. Drilling (from both fixed and mobile);
- 18.2. Diving;
- 18.3. Marine Technology;
- 18.4. Production;
- 18.5. Personnel Safety;
- 18.6. Staff Function (a general section covering non-specific functions).

NPD scrutinise the operator's plans for the whole of the operation. The design and construction of the installation has to receive NPD approval (similar in scope to the UK Certificate of Fitness); well consents are issued based on a submitted plan; and the operational and diving regulations are enforced by the Inspectorate.

19. In 1977 the Worker Protection and Working Environment Act was passed enabling regulations to be made for application offshore. Regulations were made later in 1977 and NPD are responsible for their enforcement. The regulations inter alia provide for a system of safety representatives with power to stop operations considered dangerous, and place the broad responsibility for safety on the employer. The Act itself (similar in many respects to our 1974 Health & Safety at Work Act) has a wide scope and NPD are considering making all their future regulations under this Act. The most recent regulations issued by NPD are for diving operations. The regulations are immensely detailed reflecting a concern for improving the safety of diving. The Ministry of Labour has set up a review team to consider all aspects of diving safety.

20. *The Maritime Directorate.* The Maritime Directorate acquired responsibility for mobile installations as an extension of its role in Norway in relation to ships. It deals with the design and construction aspects and (like NPD) acts as a certifying authority. The Directorate also co-ordinates the activities of other agencies and arranges joint inspection.