



HELLENIC HYDROCARBON
RESOURCES MANAGEMENT

HHRM Organisation, Policy and Strategy

UNDER L4409/2016



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1 INTRODUCTION

Law N. 4409/2016 (the Law) makes Hellenic Hydrocarbon Resources Management S.A. (HHRM) the Competent Authority for the major hazard regulation of offshore oil and gas operations within licensed areas in Greece and gives effect to Directive 2013/30/EU of the European Parliament.

The Law requires HHRM to define its organisation, policy and strategy to implement the Law including assessment of reports on major hazards (RoMHs) and inspection activity. This document does this and also describes the requirements on the three regulated parties (licensees, operators and owners). The areas covered by this document are listed below along with guidance documents (titles given in **bold italics**), which HHRM will use to judge compliance with the Law.

- HHRM Organisation and Function (Section 2) Explains the focus of the Law and the requirements for major hazard (MH) risk to be ALARP, with reference to the **ALARP Guidance**. Describes how HHRM is organised, functions and is funded.
- Scope and Regulated Parties (Section 3) Provides an overview of the scope of activities that are covered by the Law and HHRM consultation role in the appointment of the regulated parties.
- Requirements Imposed by the Law (Section 4) Summary of the requirements on Licensees, operators and owners under the Law including **RoMH and Notification Requirements**, to implement verification scheme(s) using accepted independent verification bodies (IVBs) with reference to the **Verification Guidance**, carry out thorough reviews, referencing the **Thorough Review Guidance**, reporting requirements for a well operation and maintenance of a list of emergency response equipment.
- HHRM Processes to Monitor & Enforce Compliance (Section 5) Summarises how HHRM assesses RoMHs and notifications, inspects and assure compliance with accepted RoMHs, notifications and the Law.
Repeats the need for incidents to be reported to HHRM (also covering N. 1112/2014). Provides an overview of how HHRM will investigate an incident, the enforcement process HHRM will follow in the event of non-compliance with the Law, or an accepted RoMH / notification.

Covers formal reporting to various bodies, information HHRM publishes, the process for tripartite consultation between HHRM, operators, owners and workers' representatives (including preparation and revision of standards and guidance) and the policy for HHRM's consideration of for confidential reporting of safety concerns.

Under Annex 3 of the Law, HHRM is required to *prepare a policy statement describing the aims of oversight and enforcement, and the obligations on the competent authority to achieve transparency, consistency, proportionality and objectivity in its regulation of offshore oil and gas operations*. The statement is:

HHRM is committed to ensuring that the offshore oil and gas industry meets the requirements of The Law and this will be achieved through assessment of submissions and inspection. Should a non-compliance be identified, then enforcement action will be taken. HHRM activities will be transparent, consistent, proportionate and objective.

Annex 3 also requires *a written strategy that describes its duties, priorities for action i.e. in design and operation of installations, integrity management and in emergency preparedness and response, and how it is organised*. This is covered in the remainder of this document.

2 HHRM ORGANISATION AND FUNCTION

2.1 Focus of the Law

To put HHRM's organisation and function into context, the focus of the Law is first outlined along with HHRM powers. The Law is aimed at ensuring the safety of offshore oil and gas operations from their associated potential major accidents. A major accident means *"in relation to an installation or connected infrastructure:*

- (a) "an event involving an explosion, fire, loss of well control, or release of oil, gas or dangerous substances involving, or with a significant potential to cause, fatalities or serious personal injury;*
- (b) an event leading to serious damage to the installation or connecting infrastructure involving, or with a significant potential to cause, fatalities or serious personal injury;*
- (c) any other incident leading to fatalities or serious injury to five or more persons who are on the offshore installation where the source of danger occurs or who are engaged in an offshore oil and gas operation in connection with the installation or connected infrastructure; or*
- (d) any major environmental incident resulting from incidents referred to in points (a), (b) and (c)".*

This is put into context in Figure 1 using the defined terms in the Law. There are other safety and environmental accidents that are associated with offshore oil and gas operation which are outside the definition of a "major accident", for example occupational incidents. Environmental events without a significant potential to result in harm to people are outside the definition of a "major accident".

Under the Law, operators and owners are charged with ensuring the risk of all major accident hazards related to their offshore oil and gas operations is acceptable; further detail on this is given in Section 2.2. Operators and owners have responsibility for, among other things, the control of risk from potential major accidents, including responsibility for continuously improving that control to ensure risk is reduced to a level that is ALARP. The Law requires operators and owners to have in place a Corporate Major Accident Prevention Plan (CMAPP), a Safety and Environmental Management System (SEMS), a Verification Scheme and a Report on Major Hazards (RoMH), and operate in accordance with these. How the risk is reduced to ALARP is communicated in the RoMH. The Law requires operators / owners to submit RoMHs to HHRM, who then consider them for approval, which, if successful, allows the described offshore oil and gas operations to commence. The Law gives HHRM the right to inspect to check that operations are being undertaken in accordance with RoMHs, CMAPPs, SEMSs and Verification Schemes.

To enforce compliance with the Law, the broad powers of HHRM include (Article 18 of the Law):

- Prohibiting the operation or commencement of operations on any installation or any connected infrastructure where the measures proposed in the RoMH are considered insufficient, or where a RoMH or other accepted notification is not in place;
- Requiring the operator to take such proportionate measures as considered necessary to ensure all suitable measures are taken to prevent major accidents;
- Informing the licensing authority of the inability of an operator to meet the relevant requirements of the Law and hence suggests the replacement of the operator; and
- Requiring improvements and, if necessary, prohibiting the continued operation of any installation if the requirements of Law are not being fulfilled or there are reasonable safety concerns.

Non-compliance with the Law can lead to fines and, potentially, imprisonment.

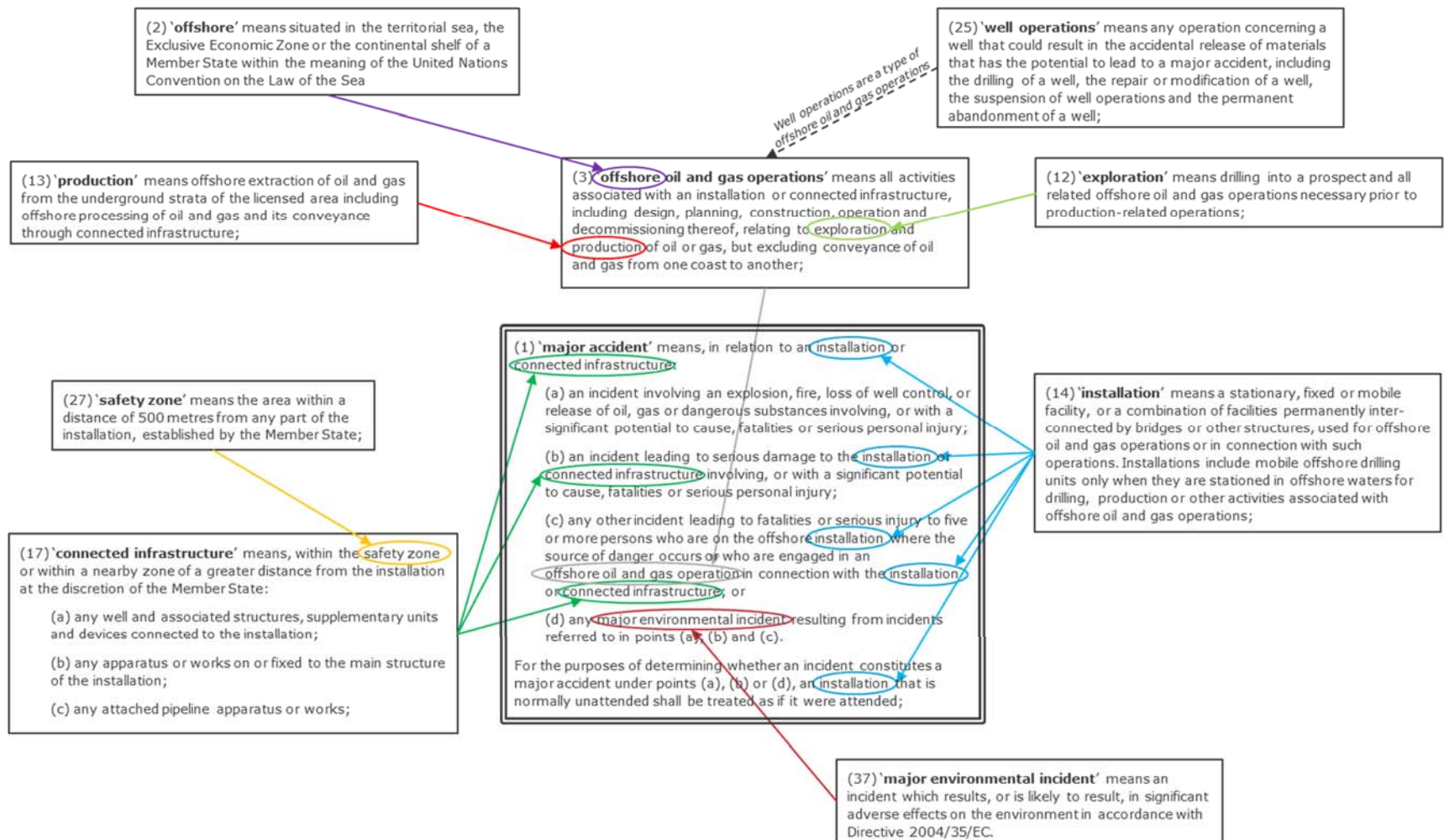


Figure 1 Extract of definitions from the Law built around the “major accident” definition

2.2 ALARP

Acceptable in relation to a risk, *means a level of risk for which the time, cost or effort of further reducing it would be grossly disproportionate to the benefits of such reduction. In assessing whether the time, cost or effort would be grossly disproportionate to the benefits of further reducing the risk, regard shall be had to best practice risk levels compatible with the undertaking.* Acceptable for a risk is also termed as low as reasonably practicable (ALARP). For risk to be ALARP, all reasonably practicable measures to reduce the risk must be implemented. The term 'reasonably practicable' indicates a narrower definition than all physically possible measures: if the cost of a measure to avert a risk, whether in terms of money, time or trouble, can be demonstrated to be grossly disproportionate to the risk reduction gained from the measure, taking account of the likelihood and degree of harm presented by that risk, then the operator or owner may not be required to adopt such a measure.

Where good practice exists, its adoption is the minimum requirement for demonstrating that risks are ALARP as good practice is, *de facto*, reasonably practicable. If good practice is not adopted, it will be necessary to demonstrate why the approach suggested by good practice is not appropriate and that the proposed alternative measures provide an equivalent, or improved level of protection to that which would have been achieved through good practice.

For major accident risk to be ALARP requires the implementation of a broad range of measures addressing people, hardware systems and procedural processes. To achieve an ALARP level of risk, major hazards that an operation or activities presents must be identified, and decisions made on what measures should be adopted to prevent, detect, control and mitigate these hazards.

The **ALARP Guidance** provides guidance on appropriate techniques for demonstrating ALARP, including the application of quantitative risk assessment and cost benefit analysis and what constitutes 'gross disproportion'. It also details the level of risk to an individual that is considered to be intolerable, and operators / owners must demonstrate that the risk of their operations is below this. This tolerability assessment will be required to consider all risk contributors including major and non-major accidents. The **ALARP Guidance** gives the risk level below which major accident risk is broadly acceptable, where it is generally more straightforward to demonstrate the risk posed by a major hazard is ALARP.

While there may be some uncertainty in risk assessment, the approach adopted should give confidence that the results are representative, if not conservative, for the operations being considered, and this must be shown in an ALARP demonstration. Where there is reason to believe that serious danger could exist, but the scientific evidence is insufficient, inconclusive or uncertain regarding the risk, then operators / owners should apply the precautionary principle. In applying the precautionary principle, it is expected that a cautious approach will be adopted to risk management, commensurate with the level of uncertainty in the assessment and the level of danger / risk.

2.3 HHRM as the Competent Authority

HHRM is the organisation which, under Law N. 4409/2016 Article 8(4), was appointed as the Competent Authority (CA) with responsibility as defined in Article 8(1), *"for the following regulatory functions:*

- (a) assessing and accepting reports on major hazards, assessing design notifications, and assessing notifications of well operations or combined operations, and other similar documents that are submitted to it pursuant to Article 11 of this law;*
- (b) overseeing compliance by operators and owners with this law, including inspections, investigations and enforcement actions;*
- (c) advising other authorities or bodies, including the Licensing Authority;*

- (d) *making annual plans pursuant to Article 21;*
- (e) *producing reports;*
- (f) *cooperating with the competent authorities or contact points pursuant to Article 27;*
- (g) *propositions for the issuance of safety regulations and for the issuance of models and instructions."*

HHRM is also the organisation responsible for licencing, as such the economic and major accident regulatory functions for offshore hydrocarbon resources are not split in Greece. This reflects the current level of offshore oil and gas operations in Greek waters with less than six installations in operation (Article 8(3)). The CA function of HHRM will be separate from the licensing part as described in Section 2.4. References to HHRM in the rest of this document refer to its role as the Competent Authority only.

Under Article 8(4) of the Law, HHRM is the sole authority appointed to act as CA. However, HHRM will work with other authorities, where relevant, to carry out its functions to help avoid duplication of regulatory activities where a role given to HHRM under the Law is currently being discharged by another authority. Further details on this are set out in Section 2.4.

2.4 Organisation and Resources

HHRM is a government operated independent company that provides management of the Greek hydrocarbon resources. HHRM has two separately managed parts, one covering the licencing of petroleum extraction and the other concerning safety led by a Regulatory Manager (currently the President of HHRM). Following Article 8(7) and Annex III, Part 2 2(a) of the Law, HHRM will contract technical specialists to support them in their regulatory duties as the Competent Authority of Law N. 4409/2016.

2.5 Interfaces within Greece

HHRM recognises that carrying out its functions efficiently and effectively will require it to interface and co-operate with other authorities and so HHRM will work with other authorities to:

- Confirm the functions each authority will carry out;
- Avoid duplication and regulatory burden through co-operation and mutual assistance; and
- Deliver a consistent regulatory system in Greece for offshore oil and gas operations.

All authorities, including HHRM, have a responsibility to carry out their own specific legal functions. To this end, the co-operation does not in any way diminish the functions of each. Whilst these interfaces represent an important information source in monitoring compliance with the Law, HHRM will form its own independent judgement on such matters.

The specific areas of interface with the other authorities are detailed below.

Information Sharing There is merit in relevant authorities co-operating and sharing information with HHRM in relation to matters such as:

- Workload planning (including the timing of proposed inspections);
- The outcome of inspections;
- Safety issues / performance trends / concerns, etc.; and
- Standardisation of information provision / reporting requirements.

HHRM will also share information with the authorities where safety considerations make it appropriate.

Co-ordinated Inspections HHRM will liaise with those authorities who carry out inspections of offshore oil and gas operations to explore where opportunities for coordination of functions may arise.

Incident Investigation To avoid duplication of roles and to increase the effectiveness of the incident investigation process, HHRM will liaise with other relevant authorities to:

- Establish lines of communication during each authorities' respective investigative process;
- Share information where possible between authorities to aid the investigation process; and
- Ensure effective co-ordination of incident investigation processes.

2.6 Interfaces outside Greece

Under Article 27(1), the competent authority regularly exchanges knowledge, information and experience with other competent authorities, inter alia, through the European Union Offshore Oil and Gas Authorities Group (EUOAG), and it engages in consultations on the application of relevant national and Union law with the industry, workers, other stakeholders and the Commission.

2.7 Recovery of Costs

Article 8(8) of the Law enables HHRM to raise revenue for the purposes of meeting its expenses and to achieve this, a common ministerial decision has been drafted. Payment is required for the assessment of notifications, RoMHs and weekly well reports and confirmation of this payment is part of the assessment process outlined in Section 5.1.

3 SCOPE AND REGULATED PARTIES

This section details the scope (operations and installations) of and bodies that N. 4409/2016 applies to and summarises requirements of the Law on these bodies. Details of the RoMHs and Notifications that are required to operate are given in the **Requirements of RoMHs and Notifications**.

3.1 Oil and Gas Operations Covered by the Law

The Law covers “*offshore oil and gas operations*”, which are defined as:

“... associated with an installation or connected infrastructure, including design, planning, construction, operation and decommissioning thereof, relating to exploration and production of oil or gas, but excluding conveyance of oil and gas from one coast to another”.

Offshore oil and gas operations of relevance to the Law are split into well operations and production operations. These two types of operation occur during the oil and gas lifecycle as depicted in a simple manner in Figure 2. They are discussed in Section 3.1.1 and 3.1.2 respectively.

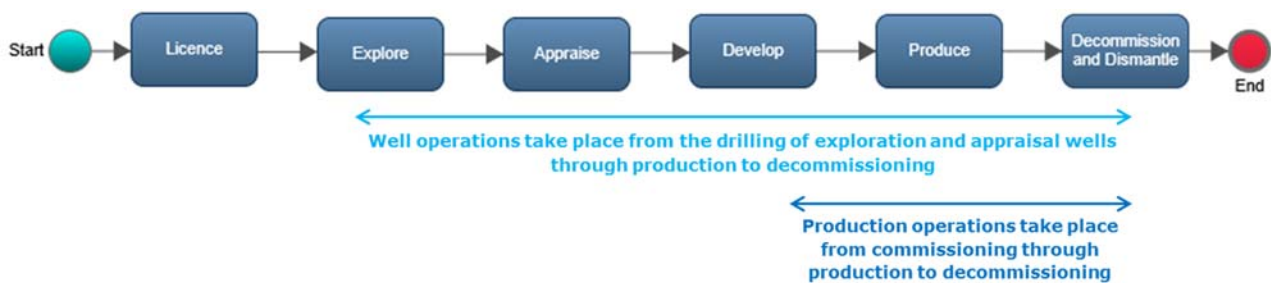


Figure 2 Oil and gas lifecycle and when well and production operations are taking place

3.1.1 Well Operations

A well operation is *any operation concerning a well that could result in the accidental release of materials that has the potential to lead to a major accident, including the drilling of a well, the repair or modification of a well, the suspension of well operations and the permanent abandonment of a well* including:

- Well interventions and workovers;
- Coiled tubing operations; and
- Plugging, blocking, capping, or abandonment of any well.

Examples of operations that are not well operations include, but are not limited to:

- Production or re-injection through an existing completion;
- Formation stimulation operations where the pressure containment boundary is not altered (e.g. acidizing or chemical injection by bullheading); and
- Well testing through an existing completion on a production installation or for an extended period on a non-production installation (see Section 3.2.2).

Well operations may take place on non-production installations (e.g. drilling an exploration well from a drilling semi-submersible, or the workover of a production well in a sub-sea completion from a jack-up) or on production installations (e.g. the workover of a production well using the installation’s drill rig).

3.1.2 Production Operations

Production is defined as *offshore extraction of oil and gas from the underground strata of the licensed area including offshore processing of oil and gas and its conveyance through connected infrastructure*.

The Law is applicable to start-up, normal operations, abnormal operations, emergency situations, shutdown and any other situations which may arise as part of offshore oil and gas operations. Combined operations and dismantling and decommissioning are also production operations.

3.1.2.1 Combined Operations

A Combined Operation is defined as *“an operation carried out from an installation with another installation or installations for purposes related to the other installation which thereby materially affects the risks to the safety of persons or the protection of the environment on any or all of the installations”*.

An example of combined operations is a drilling jack-up undertaking the workover of a production well on a production installation (without its own drill rig).

3.1.2.2 Dismantling (including Decommissioning)

Dismantling covers all activities required for the removal of a fixed production installation including the suspension and abandonment of all wells. This is preceded by decommissioning of the installation and connected infrastructure to make it free of hydrocarbon and not connected to any hydrocarbon source. All the aspects are within the scope of the Law until the point at which the structure is removed.

3.2 Installations Covered by the Law

The Law covers installations that carry out offshore oil and gas operations. An installation is *a stationary, fixed or mobile facility, or a combination of facilities permanently inter-connected by bridges or other structures, used for offshore oil and gas operations or in connection with such operations. Installations include mobile offshore drilling units only when they are stationed in offshore waters for drilling, production or other activities associated with offshore oil and gas operations*. They are split into production installations and non-production installations.

3.2.1 Production Installations

A production installation is an *installation used for production*, for example, a physical fixed platform and a floating production facility. These installations and their connecting infrastructure (within the installation's 500m safety zone), are covered under the Law.

An accepted RoMH is required from the commencement or for the continuation of offshore oil and gas operations (Article 6(5)), which is *the point in time when the installation or connected infrastructure is involved for the first time in the operations for which it is designed*. For a production installation, this is when hydrocarbons are introduced from a well or elsewhere for the purposes of commissioning. During the earlier phases (feasibility, concept and design) activities take place to enable major hazards to be managed during operations. This includes activities such as the development, submission and review of notifications and the RoMH (see the **RoMH and Notification Requirements**) and verification (see Section 4.1).

3.2.1.1 Connected Infrastructure

The Law applies to the *“installation or connected infrastructure”*, where connected infrastructure means (see Figure 1) *within the safety zone or within a nearby zone of a greater distance from the installation at the discretion of the Competent Authority*:

- (a) any well and associated structures, supplementary units and devices connected to the installation;*
- (b) any apparatus or works on or fixed to the main structure of the installation;*
- (c) any attached pipeline apparatus or works;*

The *nearby zone* in the above is defined by HHRM to include under (a) any subsea well tied back to the installation and they must be covered in the installation's RoMH. Before the commencement of production operations, any operation on such a subsea well is covered by a well operations notification.

3.2.2 Non-production Installations

A non-production installation is *any installation other than an installation used for production of oil and gas* e.g. flotel, semi-sub, drill ships, and jack-ups. These non-production installations are typically mobile installations which operate in the waters of many different jurisdictions. If they are carrying out a well operation, it can be expected that they will come from outside Greek waters, enter Greek waters, station themselves at the desired drilling location, drill and complete / suspend / abandon one or more wells, then come off location and move to their next location (inside or outside Greek waters). A similar pattern of operations would also occur with a flotel.

A non-production installation comes under the Law from the point where it is stationed at the location for its offshore oil and gas operation until it moves off its station at the end of its operations. When a non-production installation takes up its station it will meet the requirement of "*a stationary ... mobile facility*" and its activities are related "*to exploration ... of oil or gas*".

3.2.2.1 Well Testing

Well testing and appraisal may take place from a production, or non-production installation. Non-production installations undertaking short term testing and appraisal of a well(s) are treated as non-production installations, and those undertaking longer term testing and appraisal of a well(s) are treated as production installations for the duration of this activity. Further detail is given in the ***RoMH and Notification Requirements***.

3.2.3 Support Operations - Transport

Personnel will need to be transported to and from an installation; normally by helicopter or ship. Helicopters and ships used for transportation only cannot be considered installations and are not normally connected infrastructure and so are only covered the Law when they are physically connected to an installation. To clarify further using the helicopter transfer as an example:

- A helicopter accident in flight to/from an installation is outside the scope of the Law.
- A helicopter accident in flight which impacts the installation is outside the scope of the Law in terms of the management of the helicopter's safety and integrity, but may be a causal factor of Major Accidents under the scope of the Law, and as such must be considered.
- A helicopter accident while on the installation's helideck is within the scope of the Law (though through agreement, Hellenic Civil Aviation Authority are likely to lead the investigation).

3.3 HHRM Consultation in Appointment of Regulated Parties

This section describes HHRM's role (as the Competent Authority) in the appointment of parties regulated under the Law and they are:

- Licensees: "*the holders or joint holders of licenses*";
- The operator: "*the entity appointed by the licensee or licensing authority to conduct offshore oil and gas operations, including planning and executing a well operation or managing and controlling the functions of a production installation*"; and
- The owner: "*an entity legally entitled to control the operation of a non-production installation*".

3.3.1 Licensee

Under Article 4(2) of the Law, "*before granting or transferring a license for offshore hydrocarbons operations, the Licensing Authority shall consult, where appropriate, the Competent Authority*". The Law, therefore allows the HHRM (as the Competent Authority) to input to the licencing decision. The likely information that HHRM would assess for a prospective licensee includes:

- The prior safety record in Greece of the prospective licensee, including any enforcement notices, for any offshore oil and gas operation; and
- Enforcement notices from other jurisdictions where the prospective licensee, or a company in the same group operates.

The licensee is responsible for appointing an operator and has financial liability should there be an incident. A licensee may appoint separate operators for well operations and production.

3.3.2 Operator

Under Article 4(4) of the Law, *"the Licensing Authority, if it is to be considered necessary, in consultation with the Competent Authority, may object to the appointment of the operator and as a result the Holder of the License is obliged to indicate a suitable alternative operator"*. The Law, therefore allows the HHRM (as the Competent Authority) to input to the licensee's decision on the operator. The facts that HHRM is likely to consider in this are given below for three scenarios.

Operator Currently in Greece

For an operator that is operating in Greece at the time the request for advice is received, HHRM would normally advise that the operator is technically capable unless:

- The operations were different to that which the operator was carrying out and there was insufficient evidence of competence in the new area of operation; or
- If there were current enforcement notices.

In these circumstances a more detailed assessment of competence would be required as (a) to (c) below.

Operator Previously in Greece

For an operator that had previously operated in Greece, but was not doing so at the time the request for advice was received, HHRM would consider, amongst other things, the operator's:

- a) Prior safety record in Greece including any enforcement notices and fines;
- b) The organisational arrangements that the operator proposes, with emphasis on technical competency, regardless of whether resources were based in Greece, in another country working for the operator or an associated company, or work for a third party; and
- c) Enforcement notices from other jurisdictions where the operator, or a company within the same group, operates.

No Operator History in Greece

For an operator that has previously operated in Greece, but was not doing so at the time of the request for advice was received, HHRM would consider (b) and (c) above.

3.3.3 Owner

The operator is the entity that controls the offshore oil and gas operation. The owner is the entity that controls the functions of a non-production installation in carrying out, for example, well operations.

An owner is responsible for submitting a RoMH for a non-production installation. An owner or operator may submit a combined operations notification, and both need to be involved in its preparation (see Section 3.1.2.1).

There is no direct HHRM role in the appointment of an owner, though their non-production RoMH needs to be accepted before operations can commence.

4 REQUIREMENTS IMPOSED BY THE LAW

The Law places various requirements on operators and owners, which include the need to:

- Submit RoMHs and notifications to HHRM for assessment before offshore oil and gas operations can commence, or continue (Articles 11(1) and 18(a)). The HHRM **RoMH and Notification Requirements** describe the required contents and so how HHRM judge compliance with the Law;
- Prepare and submit a Corporate Major Accident Prevention Policy (CMAPP) (Articles 2(1), 19(1), 19(5)) for which guidance is given in the **RoMH and Notification Requirements**;
- Submit weekly well reports during a well operation and provision of the final well plan before it starts (Article 15(4) and Section 4.3);
- Carry out a thorough review of a RoMH at least every 5 years (Article 12/13(7) and Section 4.2);
- Ensure that the risk from operations is ALARP (Section 2.2) by ensuring that:
 - Suitable measures are taken to prevent major accidents (Article 3(1));
 - Offshore hydrocarbons operations are carried out based on systematic risk management so that residual risks of major accidents to persons, the environment and offshore installations are acceptable (Article 3(4));
 - RoMHs for a (non-)production installation shall *"demonstrate that all the major hazards have been identified, their likelihood and consequences assessed, including any environmental, meteorological and seabed limitations on safe operations and that their control measures including associated safety and environmental critical elements are suitable so as to reduce the risk of a major accident to an acceptable level"* (Annex 1, 2(5));
- Establish Verification Schemes (Article 17 and Section 4.1);
- Maintain a list of emergency response equipment (Article 19(6) and Section 4.4);
- Facilitate inspections by HHRM (Article 21 and Section 5.2);
- Notify HHRM of reportable incidents (see Section 5.3),
- Comply with improvement notices and prohibition notices issued by HHRM (see Section 5.4)
- Immediately take, in case of a major accident, all suitable measures to limit its consequences for human health and for the environment (Article 3(3) and Section 5.3.3);
- Put into action, without delay, the internal emergency response plan described in the RoMH, regularly test it and inform HHRM of these tests (Article 28(1) and Section 5.3.3);
- Provide performance information (Article 23 with Annex 9 and Section 5.5.1);
- Participate, or contributing to tripartite consultation (Article 6(8) and Section 5.5.3);
- Prepare and revise standards and guidance on best practice in relation to the control of major hazards (Article 19(7) and Section 5.5.4);
- Communicate HHRM's arrangements for confidential reporting (Article 22 & Section 5.5.5); and
- Take suitable measures to use suitable technical means or procedures to promote the reliability of the collection and recording of relevant data and to prevent possible manipulation thereof (Article 19(10)).

Although an operator may use contractors in their oil and gas exploration and exploitation activities Article 3(2) of the Law states that *“operators are not relieved of their duties under the Law by the fact that actions or omissions leading or contributing to major accidents were carried out by contractors”*. They are therefore accountable for all their duties under the Law, even where they have sub-contracted elements of the work.

The operator and owner are required to discharge their duties under the Law. The acceptance of a RoMH, or submission of a notification, by HHRM in no way shifts this onus away from the operator or owner.

4.1 Verification

Operators and owners must put into operation a verification scheme carried out by an independent verification body (IVB) for each production and well operation to verify that SECEs are designed and operate as intended and well integrity is maintained (Article 17). If the IVB finds that this is not the case, the IVB must raise an anomaly, which the operator / owner must resolve. The verifier must have suitable competence and independence to do this. More than one IVB may cover the full scope of any Verification Scheme; the boundary between them needs to be well-defined and all IVBs need to be accepted by HHRM. These requirements are detailed in the **Verification Guidance**, which also gives guidance on what an IVB should do to verify SECEs and well integrity and, with the **RoMH and Notification Requirements**, detail the aspects of a verification scheme that must be described in a RoMH or notification.

4.2 Thorough Review of a RoMH

Article 12/13(7) states that *“The report on major hazards for a (non-)production installation shall be subject to a thorough periodic review by the operator / owner at least every five years or earlier when so required by the competent authority. The results of the review shall be notified to the competent authority”*. Guidance on the conduct of a thorough review is given in the **Thorough Review Guidance**.

The *“five year”* date for submission of a thorough review report for assessment remains unchanged by whether the operator has previously submitted a material change for the report, or not.

HHRM requires that the thorough review of the report is a review, which means that persons not involved in the day-to-day operations are involved, such that a level of independence is achieved in the conduct of the review.

The operator / owner must submit the RoMH thorough review report to HHRM. The RoMH should also be sent to HHRM if it has been updated. If a material change is found to be required to the report through the review process, the RoMH must be resubmitted to HHRM. In this case, to allow continued operations under an accepted RoMH, the thorough review needs to be concluded with sufficient time such that the (updated) RoMH can be submitted to HHRM four months prior to the five year anniversary of the acceptance of the previous RoMH.

Articles 12, 13 and 18 of the Law also give the HHRM power to direct operators / owners to conduct a thorough review of a current RoMH *“earlier”* where it determines this is necessary. HHRM is most likely to direct an early review, or a review covering a particular aspect of a RoMH if it is concerned that:

- 1) The major hazards report may not reflect the true safety situation on the installation (for example that the assumptions made are no longer sound);
- 2) The installation, or the operations being undertaken are not as described; or,
- 3) The management system being operated may not be as described.

HHRM will assess the thorough review report against the ***Thorough Review Guidance*** to ensure the review was appropriate. At the end of this review, HHRM may provide feedback to the owner / operator and this is normally complete within three months of submission. Should the thorough review be found to be inadequate on conclusion of HHRM's assessment, it may require the operator / owner to make improvements, or to prohibit the continued operation of the installation or any connected infrastructure.

HHRM will also use the thorough review to review its inspection plans.

4.3 Weekly Well Report and Final Well Programme

The final well programme must be submitted to HHRM before a well operation commences. In addition, any subsequent updates made during the well programme must be provided to HHRM.

During well operations, the operator must provide weekly reports against the final well programme; first sent on the 8th day of the well operation and subsequently each week covering (Article 15(4)):

- a) The date and reference time of the report;
- b) The well operations notification reference number and well identification;
- c) The names of the operator and, where relevant, the owner and name of the non-production installation;
- d) The diameter and true vertical and measured depths of: (a) any hole drilled; and (b) any casing installed;
- e) The drilling fluid density at the time of making the report;
- f) In the case of operations relating to an existing well, its current operational state;
- g) The total number of days since commencement of the well operation, to include days ahead/behind the final program of work;
- h) A short chronological description of activities during the week preceding the reference time, including a note of any functional/pressure tests carried out on well control equipment, with their results (including blow out preventers and subsea test tree);
- i) The number of persons on board the installation from which the well operation are carried out;
- j) Current operations and description of activities forecast for the following week.

4.4 Emergency Response Equipment

Article 19(6) of the Law requires operators and owners "*to prepare and maintain a complete inventory of emergency response equipment pertinent to their offshore oil and gas operation*". There is no requirement to submit this list by itself. However, any description of such equipment in a notification or RoMH must be consistent with this list. The inventory should be appropriate for the major hazards that have been identified and such that this component of the risk is ALARP and the emergency response effective and, for safety, offer a good prospect of recovery.

5 HHRM PROCESSES TO MONITOR & ENFORCE COMPLIANCE

5.1 Assessment of Notifications and RoMHs

The key parts of HHRM's **RoMH and Notification Assessment Process** are:

Administrative Check To confirm whether the RoMH or notification includes all the required parts and the fee has been paid. HHRM will inform the operator / owner of its receipt.

Completeness Check To confirm whether the RoMH or notification has the information required – no assessment of this information is made at this time.

Notification Analysis Before the assessment of a notification commences, HHRM will consider the depth to which this is to be done as, unlike RoMHs, there is no requirement to accept a notification.

Assessment Process Thorough assessment by discipline experts headed by an Assessment Lead as to whether the RoMH, or notification:

- A. Meets the **RoMH and Notification Requirements, Verification Guidance** and **ALARP Guidance**, and
- B. Shows that *all suitable measures are taken to prevent major accidents* [Article 3(1)], and
- C. Describes a process of *systematic risk management so that the residual risks of major accidents to persons, the environment and offshore installations are acceptable* [Article 3(4)].

As per Articles 12(4) and 13(3), during the assessment process, HHRM may ask an operator or owner for additional information, or questions relating to, amongst other things:

- I. Clarifying part of the RoMH or notification; or
- II. Checking whether more detailed sample elements of the operator's / owner's processes and installation are consistent with that described in the RoMH or notification.

A slow response to these requests will affect the timescale for HHRM's assessment, or, in the worst-case, lead to rejection of the RoMH, or objection to a notification.

HHRM may consult with other authorities as part of the assessment of a RoMH or notification.

HHRM is likely to inspect (see Section 5) the operator's or owner's capability of meeting the above criteria as part of the RoMH assessment process.

Outcome

- o *Design and relocation notification* - HHRM will tell the operator that the notification is received and again once its assessment is complete. All comments made on the notification by HHRM must be addressed in the production RoMH that follows (Article 11(3)).
- o *Well and combined operations notifications* - HHRM will inform the operator when the notification is received. The operator can proceed unless an objection is received from HHRM (Article 18(a)).
- o *RoMHs* - HHRM will inform the operator / owner of its receipt and then acceptance or rejection with reasons. An accepted RoMH is required for the associated operation to continue, or commence.

Operators / owners should update their RoMH to account for the additional information, or questions and their response to them where they relate to (I) in the assessment process above and send this to HHRM.

HHRM will review all notifications. The level of review will be commensurate to the risk of the operation to which the notification relates. A notification will not be considered to meet the requirements of the Law, if it does not meet (A)-(C) above. In this case, the Operator will be informed and, as per Articles 6(6) and 18(a), the operation to which the notification relates is not permitted to continue or commence. As per Article 11(3), for design notifications, HHRM will *respond to the design notification with comments*

to be taken into account in the RoMH. If the response is extensive, then a resubmission of the design notification is appropriate.

For a material change, only the changes will be assessed by HHRM. Acceptance of any material change to a RoMH is also dependent on the prior submission of a design notification unless agreed otherwise by HHRM. HHRM will only agree to this if the material change concerns a change for which the associated ALARP demonstration is straightforward, for example, because there are limited options to consider.

5.2 Inspection

5.2.1 The Purpose of Inspections

The purpose of inspections undertaken by HHRM is to ensure compliance with the Law. It is separate from other assessment duties undertaken by HHRM on the assessment and approval of RoMHs, or other notifications made to HHRM, though a RoMH assessment is likely to include an inspection. The purpose and general areas for inspection are outlined below.

5.2.1.1 Licensee

HHRM will inspect whether a licensee has taken reasonable steps to ensure that it is complying with its duties and obligations under the Law including Article 6(3). Inspections will be risk-based, carried out throughout an installation's lifecycle, and will consider the performance of the licensee's operator(s).

5.2.1.2 Operators and Owners

HHRM will carry out inspections to assess whether an operator / owner is managing risk:

- A. Managing risks in accordance with their RoMH (and notification as appropriate);
- B. Such that *all suitable measures are taken to prevent major accidents* are taken [Article 3(1)], and
- C. Are following process of *systematic risk management so that the residual risks of major accidents to persons, the environment and offshore installations are acceptable* [Article 3(4)].

To do this, HHRM will visit operational sites and locations where records are held, and assess hardware, software, people and procedures. This could also be by other persons acting under the direction of HHRM (Article 21(2)). The outcome of inspections may form the basis of enforcement action. Where offshore oil and gas operations are regulated by other authorities as well as HHRM, HHRM will coordinate with them on inspections to reduce the potential for overlap of regulatory activities.

Inspections may be carried out during:

- Design, Procurement, Construction and Commissioning
 - At this stage, HHRM have no powers to require improvement, or prohibit an operation, but may gather information for enforcement at the commencement of operations. Any issues would be communicated to the operator to allow them to be remedied before operations commenced;
- HHRM's assessment of a RoMH
 - To clarify matters raised and to assess the ability to operate according to the RoMH;
- Well operations, including drilling, workovers and wirelining;
- Ongoing operations including
 - Discipline or topic inspections and assessment of thorough reviews of RoMHs; and
- Decommissioning and dismantling for production installations.

Inspections are carried out to ensure, for example:

- Operators or owners are in compliance with their RoMH, in particular to ensure;

- The installation, infrastructure, manning levels and processes are as described;
- The SEMS is as described and are operating correctly;
- The verification scheme is being effectively implemented by the owner / operator and any anomalies raised by the IVB are being acted on;
- That the emergency equipment (lifejackets, lifeboats etc) and other SECEs described in the RoMH are available in sufficient quantities and that these will remain operational under emergency conditions for as long as required;
- That the measures described in the internal emergency response plan are in place, along with suitable means for ensuring adequate control of major accidents;
- The physical condition of the installation, equipment, pipework etc is adequate and that it will be likely to meet operational stresses (loads, pressures, temperatures, chemicals etc.); and
- To close-out any issues raised during the assessment of RoMH or other notifications.

5.2.1.3 Inspection of New-builds

It is possible that any new-builds which are reported to HHRM under a design notification may be subject to onshore inspections at the offices of owners or operators to discuss details of the notification, as well as in construction yards to inspect the installations themselves.

As the Law applies only in Greece, any inspection activities undertaken by HHRM outside Greece will be conducted with prior agreement from the future owner or operator. The Findings of any such inspection will not be binding until the issues noted arise formally in a RoMH, notification, or physical inspection in Greece.

These inspections will not be undertaken in every case and will be aimed at clarifying any issues raised during the assessment of the design notification, as well as inspecting the new installation for future compliance with the Law when the installation commences operation.

As with its other inspection or enforcement activities, HHRM will seek to recover the costs of undertaking the above inspection activities.

5.2.2 Conduct of Inspections

Under Article 21(2) of the Law, operators and owners must *provide the Competent Authority, or any other persons acting under the direction of the Competent Authority, with transport to or from an installation or vessel associated with oil and gas operations, including the conveyance of their equipment, at any reasonable time, and with accommodation, meals and other subsistence in connection with the visits to the installations, for the purpose of facilitating Competent Authority oversight, including inspections, investigations and enforcement of compliance with this law.*

During their inspections, HHRM personnel may be supported by inspectors from other Greek regulatory bodies, as well as by any technical experts they require.

As part of the HHRM transparency arrangements, inspections will normally be conducted against a planned agenda and inspection timetable sent to the owner or operator in advance. However, there will be cases where unplanned inspections will be required, for which HHRM will give no notice and where the owner or operator may be required to provide transport and to host an inspection at short notice.

Depending on the purpose and agenda of inspections, offshore inspections will vary in duration depending on the size of the installation, or infrastructure being inspected, the length of the working day

and time actually spent offshore each day, the number of inspectors and the number and complexity of topics being inspected. Inspections will vary in length between 1-4 days and an inspection team will typically contain 2-4 people.

HHRM may undertake inspections onshore in company offices, or at premises owned by suppliers of equipment used by the offshore industry, as well as offshore on the installations themselves.

Inspections are based on:

- Examination of records, reports and other evidence relating to, for example, safety operation and performance, the SEMS, verification records and safety performance reports.
- Physical examinations of the installation, systems and parts of systems and hardware, for the purposes of assessing the integrity, and / or operation of these systems.

5.2.2.1 Inspection Outcome

Areas where lesser breaches of the Law have been found (termed Findings) will be notified in writing to owners and operators within two weeks of completion of an inspection along with a time by which the owner or operator should provide a written response in return to HHRM to clarify the issue, or describing how they will correct the deficiency. This will need to be agreed by HHRM. If resolution of the finding is not satisfactory, then further enforcement action may follow as described below.

Should it be found directly, or as a result of inaction by an Owner/Operator from a Finding, that a higher level of enforcement is required, HHRM will immediately notify the owner or operator of this and, if prohibition is appropriate, what activity they are to cease and why. On occasion and as required, for issue of an Improvement Notice, or Prohibition Notice, HHRM will inform that it will be issued, but may need time to formulate the notice.

5.2.3 Inspection Planning

5.2.3.1 Inspection Frequency and Topics

While a risk-based approach will be adopted for inspections, HHRM's policy is to carry out at least one inspection of an installation every year and to inspect each installation by each relevant technical discipline at least every 5 years. The scope of any inspection will be directed by considerations including:

- The review of the RoMH, any notifications which have been made, including findings of any thorough reviews which may have highlighted areas for inspection;
- The results of previous inspections;
- Anomalies raised from the verification system;
- Incidents that have happened;
- The results of confidential reporting to HHRM; and
- Topics / issues of interest.

HHRM will maintain an annual plan for inspections that will also consider the bulleted points above.

5.2.3.2 Notification of an Inspection

Inspections will normally be planned in advance with a scope provided beforehand, but in some circumstances, inspections may be un-announced.

Where assessment outcomes, details of new installations and planned arrivals of mobile installations are known, owners and operators will be notified of which quarter of the year in which HHRM intend to visit, in accordance with the inspections in HHRM's annual plan. Should other installations arrive, or other

activities be planned by owners or operators, which HHRM think require an inspection, shorter periods of notice than this may be given.

Where possible, HHRM will work with owners or operators to agree a mutually convenient time for the inspection to take place. However, there may be cases when this is not possible and where HHRM will require the cooperation of the owner or operator in making the necessary arrangements for HHRM to undertake the inspection.

Example of cases where HHRM may require inspections to be undertaken at short notice could include the investigation of complaints, reviewing compliance with progress against enforcement actions, or following up urgent matters raised during assessments or after investigations.

5.2.3.3 Inspection Prioritisation

Inspections will be prioritised using the following factors:

- The size of the installation or the complexity of operations being undertaken – a large multi-jacket installation with complex production trains is more likely to be visited than an unmanned installation with little on-board processing;
- The degree of risk presented by the operations being undertaken, that is, the individual or societal risks declared by the owner or operator in their RoMH or other notifications;
- Past HHRM inspection history of that owner or operator;
 - There is likely to be an inspection during the assessment of an RoMH as well as prior to operations commencing, or at an early stage in their operations.
- Existing operators will be inspected in accordance with their enforcement history and the number of issues raised during assessments or previous inspections.
- Proximity of the operations to environmentally sensitive areas.

5.3 Incident Reporting and Investigation

5.3.1 Reporting

Operators and owners must notify HHRM as soon as practical of any reportable incidents under N. 4409/2016 and N. 1112/2014 and in the form, timeframe and accompanied by such additional information as may be prescribed by HHRM (an "Incident Notification").

In addition, Article 19(9) states that: *Where an activity carried out by an operator or an owner poses an immediate danger to human health or significantly increases the risk of a major accident, the operator or the owner is obliged to take suitable measures which may include, if deemed necessary, suspending the relevant activity until the danger or risk is adequately controlled. In case where such measures are taken, the operator or the owner notifies the competent authority accordingly without delay and no later than 24 hours after taking those measures.*

5.3.2 HHRM's Investigation

HHRM will undertake investigations into reportable incidents to determine:

- Causes;
- Whether appropriate action has been taken by the Owner/Operator, or needs to be taken, to prevent recurrence and to secure compliance with the Law;
- Lessons to be learnt for the industry;

- Whether HHRM can *implement any of the recommendations that are within its powers to act on*. These recommendations are likely to be aspects associated with HHRM's function and may mean preparing additional guidance on a topic, developing additional regulatory provisions etc; and
- Whether there has been a breach of the Law and what response is appropriate.

All reported major accidents that occur will be investigated. For the purposes of determining whether an incident constitutes a major accident, an installation that is normally unattended will be treated as if it were attended (from the definition of major accident in the Law).

In selecting which complaints or reports of incidents, events or injuries to investigate and in deciding the level of resources to be used, HHRM will take account of the following factors:

- the severity and scale of potential or actual harm;
- the seriousness of any potential breach of the law;
- knowledge of the owner/operator's past safety performance; and
- the wider relevance of the event, including serious public concern.

The investigation shall be carried out in accordance to HHRM's ***Incident Investigation Procedure***.

5.3.3 External Emergency Response

Under Article 29 of the Law, HHRM will develop with other authorities an external emergency response plan that takes account of Operators and Owners internal emergency response plans. Under Article 29(6), operators and owners are required to *regularly test their preparedness to respond effectively to major accidents in close cooperation with the relevant Authorities and the Competent Authority for the activation and application of the external emergency response plans*. They should notify HHRM of planned tests.

Under Article 30 of the Law, operators and owners are *obliged to notify without delay the relevant authorities and bodies of a major accident or of a situation where there is an immediate risk of a major accident*. They must put their emergency plans into operation if a major accident occurs and record information to allow a subsequent investigation.

5.4 Enforcement

5.4.1 Purpose of Enforcement

HHRM's purpose, as Competent Authority (defined under Law N. 4409/2016 'the Law'), is to ensure that licensees, owners and operators of offshore installations and any connected infrastructure manage and control risks acceptably, thus preventing harm. A key method of promoting and achieving sustained compliance with the Law this is through enforcement, which ensures that owners, operators, or offshore petroleum extraction licensees, who do not comply with the Law are held to account by HHRM issuing enforcement notices and proposing prosecution or fines.

5.4.2 Enforcement Powers

HHRM has a range of tools at its disposal in seeking to secure compliance with the Law whilst ensuring a proportionate response. Inspectors may offer owners and operators information, and advice, both face to face and in writing. If there is a minor non-compliance with the Law, a Finding will be issued and action is required from the party in non-compliance to remedy the situation in a timescale to be agreed with HHRM. Should this not be completed, or the initial infringement is more serious, HHRM may *require improvements* and *prohibit the continued operation of any installation* (under Article 18(e) of The Law).

The requirement to improve, or prohibit an operation will be communicated through Improvement Notices and Prohibition Notices respectively.

- Improvement Notices are served where, in the opinion of the inspector, there is a breach in the compliance with the Law, where there is no immediate risk that a MAH could occur.

In such a case, the owner or operator may continue operations relating to the notice and will be given written instructions as to which aspects of their management or operations they need to improve, along with a timescale within which they need to complete these actions.

- Prohibition Notices are served where there is a serious failure of compliance with the Law which, in the opinion of the inspector, has the potential to result in a major accident.

On being served with a prohibition notice, all activities subject to the notice must cease immediately and cannot be restarted until the owner or operator has taken whatever steps are necessary to improve compliance to the satisfaction of HHRM's inspectors.

- Fines, other and penal penalties can be imposed (Article 32) by a decision of the Minister of Environment and Energy, after a proposal of the Competent Authority in accordance with the Law.

These powers escalate to reflect the seriousness of the contravention. HHRM retains discretion under the Law to determine the appropriate enforcement response, on a case by case basis, so as to ensure compliance with the Law.

HHRM will identify the party or parties in breach and in respect of which enforcement action is to be taken. The decision as to against whom enforcement action will be taken will be made after due consideration of the facts and circumstances and having regard to HHRM's duties including to act in a manner that is reasonable, proportionate and fair.

The Law is goal setting; it sets out what must be achieved not how it must be done and this is especially relevant when demonstrating ALARP or determining how to best to control MAHs. HHRM will use the **Thorough Review Guidance**, **ALARP Guidance**, **Verification Guidance** and the **RoMH and Notification Guidance** to judge compliance with the Law.

5.4.2.1 Prosecution

Article 32 of The Law allows for penal penalties through the Courts with imprisonment of at least 6 months. The decision on whether to prosecute in court will take account of the evidence available, the severity of the breach and the relevant public or legal expectations relating to the offence. No prosecution will go ahead unless there is sufficient evidence that provides a realistic prospect of conviction, and it is in the interest of the Greek public.

Subject to the above, HHRM expects that, in the public interest, it would recommend prosecution, where, following an investigation, or other regulatory contact, one or more of the following circumstances apply:

- a death, reportable under the Law has occurred which was a result of a breach of the Law;
- the gravity of an alleged offence, taken together with the seriousness of any actual or potential harm, or the general record and approach of the offender warrants it;
- there has been reckless disregard of requirements of the Law;
- the owner's or operator's standard of managing MAHs is found to be far below what is required by the Law and to be giving rise to significant risk and there have been repeated fines for the same, or similar offences; or,

- there has been a failure to comply with an improvement or prohibition notice.

5.4.2.2 Non-approval of submissions by owners or operators

In addition to Notices, fines and prosecutions, HHRM can refuse to approval of a RoMH. This is done where HHRM's assessment of a RoMH or notification finds it to be inadequate, HHRM *prohibits the operation or commencement of operations on any installation or any connected infrastructure*, under powers granted by Article 18(a) of the Law.

In the event of non-acceptance of a RoMH, continuation or commencement of the operation described is automatically prohibited (Articles 6(5), 6(6) and 18(a)). In this case, for operations to commence, an updated RoMH would need to be resubmitted and then assessed by HHRM. An operation that is notifiable cannot go-ahead if HHRM object to it following their assessment. The same process applies to material changes of RoMHs and notifications.

If a RoMH or notification has not been submitted by the Owner/Operator, then the operation to which it relates cannot continue, or commence.

5.4.3 Enforcement Policy

In deciding how it uses its powers, HHRM's enforcement policy is for regulatory action to be:

- Proportionate (to the level of risk);
- Have a consistency of approach;
- To target higher risks; and
- Transparent about how the regulator operates and what those regulated may expect.

These principles are described in the following sections.

5.4.3.1 Proportionality

Proportionality means relating enforcement action to the risk. Those whom the Law protects and those on whom it places duties (owners and operators) expect that action taken by HHRM to achieve compliance or bring owners and operators to account for non-compliance should be proportionate to any risks, or to the seriousness of any breach, which includes any actual or potential harm arising from a breach of the law.

In practice, applying the principle of proportionality means that HHRM takes particular account of how far the owner or operator has fallen short of what the law requires and the extent of the risks to people or the environment arising from the breach. HHRM will also take account of whether the Owner/Operator meets the requirements within the various guidance documents for the Law especially the **ALARP Guidance** and use the guidance within these same documents to determine whether the requirements of the Law have been met.

5.4.3.2 Consistency

HHRM will take a consistent approach in any enforcement action. HHRM will take a similar approach to Owners or operators managing similar risks including the use of enforcement notices, approvals etc.; or other decisions; and in the response to incidents.

HHRM recognises that in practice consistency is not a simple matter. Inspectors are faced with many variables including the degree of risk, the attitude and competence of management, any history of incidents or breaches involving the owner or operator, previous enforcement action, and the seriousness of any breach, which includes any potential or actual harm arising from a breach of the law. Decisions on enforcement action are discretionary, involving judgement by the inspector.

5.4.3.3 Targeting

Targeting means:

- making sure that HHRM effort is concentrated on those activities giving rise to the most serious risks, or where the hazards are least well-controlled; and
- actively targeting specific areas where HHRM is aware of common failures across several owners or operators.

HHRM will develop appropriate means to ensure which inspections, investigations or other activities and then subsequent enforcement as necessary should take priority according to the nature and extent of risks posed by an owner's or operator's operations. The owner's or operator's management competence is important in this judgement, because a relatively low hazard site poorly managed can entail greater risk than a higher hazard site that is well-managed.

Any enforcement action will be directed against owners or operators responsible for a breach. Where several parties have responsibilities, HHRM may take action against more than one when it is appropriate to do so in accordance with this policy.

When inspectors use powers conferred to it under the Law, HHRM will notify the responsible person and/or senior management within the owner, or operator, as per contact details set out in the RoMH.

5.4.3.4 Transparency

Transparency means helping owners or operators to understand what is expected of them, why decisions are made and what they should expect from HHRM. This describes how HHRM operates. Owners, operators, employees, their representatives, contractors and others also need to know what to expect when dealing with HHRM and what rights of complaint are open to them. Complaints procedures are set-out on HHRM's website.

5.4.4 Appeals

HHRM policy is for there to be an appeals process for all aspects of enforcement. The appeals processes follow Administrative Procedure Codes (L. 2717/1999, L. 2690/1999), are completed within a defined timescale and do not allow a potentially dangerous situation to continue while an appeal is in progress.

5.5 Other Processes

5.5.1 Annual Report to the European Commission

HHRM will report annually to the European Commission on:

- The number, age and location of installations;
- The number and type of inspections and investigations carried out, and any enforcement actions or convictions;
- Incident data;
- Any major change in legislation or guidance; and
- The performance of operators and owners in relation to prevention of major accidents and the limiting of consequences of major accidents that do occur.

The annual report to the European Commission will be published and made available on HHRM's website. Where relevant, this information will be required from operators / owners.

5.5.2 Information HHRM will Publish

HHRM will make the following publicly available the guidance on the Law including the:

- ***RoMH and Notification Requirements;***
- The ***ALARP Guidance, Thorough Review Guidance*** and policies referenced in Section 1 of this document; and
- Ministerial decisions relevant to the Law.

5.5.3 Tripartite Consultations

The Law requires that HHRM establishes tripartite consultations between HHRM, operators and owners, and workers' representatives, to facilitate dialogue and cooperation. This dialogue will cover:

- i. The operation of the regulatory system; and
- ii. Matters set out in Annex 6 of the Law.

HHRM will facilitate and chair these meetings. Details of the meeting arrangements will be published on the HHRM website. Meetings will be held at least once annually. The frequency may change as industry activity in Greece changes.

5.5.4 Preparation and Revision of Standards and Guidance

Under Article 19(7), operators and owners are required, in consultation with HHRM, to make use of the exchanges of knowledge, information and experience provided for via HHRM as competent authority and European Union Offshore Authorities Group member, to prepare and revise standards and guidance on best practice in relation to the control of major hazards throughout the design and operational lifecycle of offshore oil and gas operations. At least the items listed in Annex 6 of the Law must be considered.

5.5.5 Confidential Reporting

Article 22 of the Law requires HHRM to establish mechanisms for the:

- Confidential reporting of safety and environmental concerns relating to offshore oil and gas operations from any source; and
- Appropriate investigation of such reports while maintaining the anonymity of the individuals concerned.

To satisfy this, HHRM contact details are made available as follows:

- A. On the competent authority part of the HHRM website;
- B. During inspections, HHRM meet with and issue contact details to safety representatives; and
- C. On acceptance of a RoMH, HHRM contact details are issued to the Operator, or Owner.

Employees of operators and owners may contact HHRM at any point with safety concerns in a fully confidential manner, via email or telephone. Following consideration by HHRM, safety concerns will be addressed in a manner proportionate to the concern raised. For example, where the confidential report does not refer to an immediate safety concern the topic may be included in an upcoming inspection.

Operators and owners are required to communicate the details of these mechanisms for the confidential reporting of safety concerns to their employees and contractors carrying out offshore oil and gas operations, and ensure that reference to confidential reporting is included in relevant training and notices.