

Circular - Series R

Circular Series R (Regulations) supersedes previous Series F. In the new Series R, relevant legal amendments and amendments to conventions are also published.

Circular recipients: (check box)

- Sdir: the Norwegian Maritime Authority
- A: 16 specially authorised employment offices
- U: Selected foreign service missions
- P: Equipment manufacturers, any subgroups
- OFF: Offshore companies/OIM/operators
- Hov: Main organisations
- H.i: Bodies or agencies for their comments
- Others:

No.:

Date: 18 March 2021

Journal No.: 2020/53069

Supersedes: Regulations of 15 January 2008 No. 72 on helicopter decks on mobile offshore units

Reference to: Regulations of 18 March 2021 on helicopter decks on mobile offshore units.

The Circular should be entered into a special diagram or as appropriate in the latest editions of relevant NMA publications and kept until the next editions.

New Regulations on helicopter decks on mobile offshore units

Introduction

The Norwegian Maritime Authority (NMA) has laid down new Regulations on helicopter decks on mobile offshore units (Helideck Regulations). These Regulations enter into force on 1 April 2021. As from the same date, the Regulations of 15 January 2008 No. 72 on helicopter decks on mobile offshore units are repealed.¹

The consultation

The proposal was circulated for review from 8 July to 8 October 2020. The NMA received responses from nine consultative bodies, whereof two did not include any comments to the proposal. An overview of the consultative statements can be found in the attached consultation matrix (in Norwegian only).

Compared to the draft Regulations that were circulated for review, the Norwegian Maritime Authority has made some necessary amendments to the Regulations laid down by this Circular.

The draft Regulations that were circulated for review included a chapter 7 on meteorological information and equipment. In this chapter reference was made to the requirements of the Regulations of 14 May 2019 No. 604 relating to helicopter operations – use of offshore helidecks² chapter VIII. This chapter is repealed by the Regulations of 23 February 2021 No. 526 from 1 July 2021 relating to flight meteorological information service on the Norwegian Continental Shelf. Furthermore, the requirements for the carriage of meteorological equipment are covered by section 6 third paragraph of the Regulations of 4 September 1987 No. 856 on the construction of mobile offshore units. Based on this, the Norwegian Maritime Authority has not included these requirements in the new Helideck Regulations. Compared to the draft Regulations the numbers of the chapters and sections have therefore been changed in the Regulations.

Furthermore, following the consultation, the Norwegian Maritime Authority has attached drawings to the Regulations.

¹Hereinafter referred to as the Helicopter Deck Regulations of 2008.

²Hereinafter referred to as the Norwegian Civil Aviation Authority's Regulations.

The NMA circulated for review a requirement of section 44 fifth paragraph which states that “If the fuelling facility is placed above a living quarter module, all exterior surfaces of the module that may be exposed to hydrocarbon fire shall be insulated to class A-60 standard”. The aim of the requirement was to specify and explain the minimum fire insulation requirement. Based on the consultative comments and a new assessment, the NMA has concluded that section 4 on risk assessments in the Regulations of 31 January 1984 No. 227 on precautionary measures against fire and explosion on mobile offshore units is satisfactory. Based on this, the requirement is set out, and the paragraph numbering of the provision has been amended.

As regards the transitional provision of section 45, however, we have included a transitional provision in the first paragraph following the consultation. This is done in conformity with the other transitional provisions commonly included in the NMA's regulations that apply to Norwegian mobile offshore units. Therefore, the company may operate in accordance with sections 6 to 43 of the Helicopter Deck Regulations until the next certificate renewal, or if a building contract is placed before 1 April 2021. See Appendix 2 to the Regulations, but the chapters and drawings have not been included. Note, however, that section 45 second and third paragraph sets 1 January 2022 as deadline for complying with the requirements to mark the helideck. That means that the deadline of the proposed Regulations has been extended.

Additionally, some linguistic changes have been done following the consultation.

It is the NMA's assessment that neither the scope nor the content of the amendments made after the consultation make it necessary to circulate the amendments for final approval.

Comparison

| New Regulations on helicopter decks on mobile offshore units | Helicopter Deck Regulations of 2008 |
|---|--|
| Section 1 | Section 1 |
| Section 2 New definitions in (c) and (d). | Section 2 (b) and (g). |
| Section 3 | Sections 40 and 41 |
| Section 4 | Section 41 second paragraph. |
| Section 5 New requirements. | |
| Section 6 New requirements. | |
| Section 7 New requirement regarding number of persons in the helideck crew. | Section 2 (f), section 37 second, third, fifth and sixth paragraph, and section 42 first paragraph. Section 37 fourth paragraph has not been continued. |
| Section 8 | Section 42 second paragraph, however, the third paragraph has not been continued. The training is also covered in the Regulations of 5 September 2014 No. 1191 on a safety management system for Norwegian ships and mobile offshore units. |
| Section 9, but with some linguistic changes. The order of the requirements has been amended compared to section 6 of the Helicopter Deck Regulations of 2008. | Section 6 and section 37 first paragraph. |

| | |
|--|--|
| Since the requirement in section 37 first paragraph of the Helicopter Deck Regulations of 2008 is covered by section 9, there is no separate requirement in chapter 8 on fire and rescue. | |
| Section 10, but with some linguistic changes and changes to the order compared to the Helicopter Deck Regulations of 2008. The requirement that “the helideck shall be watertight” in section 19 of the Helicopter Deck Regulations from 2008 has been included here. | Sections 7 and 19. |
| Section 11. D_H is introduced as a term. | Section 8 |
| Section 12 | Section 9 |
| Section 13 | Section 13 has been divided into sections 13 and 14. |
| Section 14 | Section 13 has been divided into sections 13 and 14. |
| Section 15 | Section 14 |
| Section 16, but with linguistic changes and changes and division into paragraphs compared to the Helicopter Deck Regulations of 2008. | Section 18 |
| Section 17 | Section 19 |
| Section 18, but with linguistic changes and specifications. Division into more paragraphs compared to the Helicopter Deck Regulations of 2008. | Section 15 |
| Section 19 | Section 16 |
| Section 20, but with linguistic changes and changes and specification in the second and third sentences compared to the Helicopter Deck Regulations of 2008. | Section 17 |
| Section 21 | Sections 10 and 12 |
| Section 22 continues parts of sections 10 and 11 of the Helicopter Deck Regulations of 2008. | Sections 10 and 11 |
| Section 23 New | |
| section 24 New fourth paragraph | Section 20 |
| Section 25, but with linguistic changes and changes and the order of the requirements has been changed compared to the Helicopter Deck Regulations of 2008. | Section 21 |
| Section 26, but with some linguistic changes compared to the Helicopter Deck Regulations of 2008. | Section 22 |
| Section 27 New second paragraph. | Section 23 |
| Section 28 New second paragraph. D_H – value is used in the first paragraph. | Section 24 |
| Section 29 New requirement in the second paragraph for obstruction lights. | Sections 25 and 27 |

| | |
|---|--|
| Section 30 New requirement in the first paragraph final sentence. | Section 26 We do not continue the requirement for marking in Norwegian. |
| Section 31 Amendment to the first paragraph (b) from 25 candela to 30. New requirement for status lights in the fifth paragraph. | Section 27 |
| Section 32, but with linguistic changes compared to the Helicopter Deck Regulations of 2008. | Section 32 |
| Section 33 | Section 35 |
| Section 34, but with linguistic changes compared to the Helicopter Deck Regulations of 2008. | Section 36 |
| Section 35, but with linguistic changes compared to the Helicopter Deck Regulations of 2008. | Section 38 eighth paragraph. |
| Section 36 | Section 38 first paragraph first and second sentences, and fourth paragraph second sentence. |
| Section 37 New requirement in the first and fifth paragraphs. | Section 38 fourth and fifth paragraph. |
| Section 38 (a) second sentence is new. | Section 38 first paragraph last sentence and second paragraph |
| Section 39, but with linguistic changes compared to the Helicopter Deck Regulations of 2008. | Section 31 third paragraph. |
| Section 40, but with a specification in the last part of the first paragraph compared to the Helicopter Deck Regulations of 2008. | Section 38 fifth paragraph first sentence and second indent. |
| Section 41, but with linguistic changes compared to the Helicopter Deck Regulations of 2008. | Section 38 sixth, seventh, ninth and tenth paragraphs |
| Section 42 | Section 38 eleventh, twelfth and thirteenth paragraphs. The second sentence of the thirteenth paragraph has not been continued. Moreover, we have removed the requirement that the cabinet or box must be marked in Norwegian. Furthermore, the reference to the Fire Protection Regulations in the eleventh paragraph has not been included. Regarding fire-fighting equipment, this requirement is already covered in the Fire Protection Regulations, and there is no need to include it here. |
| Section 43 Fifth paragraph is new. | Section 39. The reference to the IMDG Code in the fourth paragraph first sentence has not been included. The same applies to the fourth paragraph second and third sentences, parts of the eighth paragraph, and the eleventh paragraph |

Comments to certain provisions of the Regulations

To section 1

The Regulations apply to mobile offshore units registered in Norway.

To section 2

We have changed the definition for helicopter operator after the consultation. Rather than referring to the Regulations of 7 August 2013 No. 956 on aircraft operations section 4 a, we define a helicopter operator as a legal person engaged in aviation the same way “aviation enterprise” is defined in section 2 (g) of the Helicopter Deck Regulations.

To section 4

The requirement to keep records is mainly a continuation of current law, but with an addition saying that also the use of the helicopter deck must be recorded.

To section 7

In the consultation, we proposed that the “helicopter deck crew is responsible for the execution of helideck operations” in the second paragraph. This phrase is covered by the first paragraph and therefore, the adopted Regulations do not contain a separate paragraph concerning this.

In the second paragraph, we have made linguistic changes to correspond with the amendment made by the Norwegian Civil Aviation Authority in their Regulations.

To section 8

The headline was changed following the consultation. The wording is also more connected to the company’s safety management system which is regulated in the Regulations of 5 September 2014 No. 1191 on a safety management system for Norwegian ships and mobile offshore units. The content is intended to be the same as during the consultation.

To section 13

Based on consultative statements, we have included the same wording as in section 16 of the Norwegian Civil Aviation Authority's Regulations.

To section 14

Following consultative statements, we have included the same wording as in section 17 of the Norwegian Civil Aviation Authority’s Regulations.

The Norwegian Maritime Authority considers a jack-up in jacked up condition to be covered by section 14 fourth paragraph first sentence.

To section 15

“Certified for low flame spread” implies that according to the Norwegian Maritime Authority, the paint coat should be in accordance with the manufacturer’s recommendations.

To section 16

This section provides a possibility of not having to install a safety kerb if measures have been established to ensure that firefighting foam and water are led into the gutter.

To section 18

In section 18, the layout has been slightly amended compared to the draft Regulations.

To section 19

The requirement continues section 16 of the Helicopter Deck Regulations from 2008, however, it also allows for access to midship helidecks to be placed in accordance with a recognised standard.

To section 21

The possibility set out in the 2008 Helideck Regulations of having handrails at exits that project more than 25 cm above the helideck level has been excluded. However, the list in the second paragraph shows what is permitted. It is, inter alia, allowed to have status lights up to 25 cm above the helideck level and alternative lighting up to 25 mm above the helideck level.

After the consultation, a reference to section 31 third paragraph has been included in the second paragraph (d).

Mobile offshore units mentioned in the third paragraph last sentence may, nevertheless, have obstacles no higher than 0.05 D within a distance of 0.12 DH going outwards from the edge of the helideck.

To section 22

The provision lays down a requirement that there shall be a certain obstacle-free sector and how this should be calculated.

To section 23

The provision lays down alternative requirements to obstacle-free sector on units with hulls regulated in section 21.

To section 27

The new second paragraph must be seen in context with the alternative requirements in section 23 for units with hull.

To section 29

According to the fourth paragraph obstruction lights and obstacle floodlighting shall be fed from an uninterruptible power supply. The Helicopter Deck Regulations of 2008 required a maximum connection time of 10 seconds. In order to meet this requirement all Norwegian-registered units are provided with UPS (uninterruptible power supply). In principle, this means that they already have uninterruptible power supply. The requirement is therefore only a specification of the current practice.

To section 31

The fifth paragraph includes a reference to paragraph 3.5.26 of the MODU Code on status lights. The requirement is aimed at mobile offshore drilling units only, so a relaxation has been made following the consultation.

The automatic warning for H₂S gas, however, must be seen in context of section 25.3 of the Regulations of 31 January 1984 No. 227 on precautionary measures against fire and explosion on mobile offshore units³ that deals with gas detection systems. This regulation in the Helicopter Deck Regulations will be in accordance with the regulations of the Fire Protection Regulations.

In the sixth paragraph floodlights, perimeter lights and status lights shall be connected to an uninterrupted power supply. In the Helicopter Deck Regulations from 2008 the required maximum connection time is 10 seconds. In order to meet this requirement all Norwegian-registered units are provided with UPS (uninterruptible power supply). In principle, this means

³ Hereinafter referred to as the Fire Protection Regulations.

that they already have uninterrupted power supply. The requirement is therefore only a specification of the current practice.

To section 37

In the first paragraph there is a change from 5.5 to 6 litres of foam solution per m² compared to the requirement of section 38 fourth paragraph of the Helicopter Deck Regulations of 2008. The requirement will be in accordance with CAP 437 and the MODU Code. The large helicopter decks these days mean that this often becomes dimensioning. The delivery capacity must still be 10 minutes.

In the fifth paragraph, a new requirement has been added stating that all three oscillating foam monitors must be capable of being used simultaneously. The use of oscillating form systems is in line with previous practice of the Norwegian Maritime Authority, and as a solution granted by exemption.

To section 38

To correspond with the MODU Code there is a new requirement in (a) stating that oscillating foam monitors also must be capable of switching quickly to manual operation.

In (d) the requirement is specified compared to the requirement in the Helicopter Deck Regulations of 2008 specifying that the foam monitors must be capable of being operated locally.

To section 39

This section makes it clear that remote operation shall be possible not only for foam monitors, but for the foam system on the helideck. Linguistic changes have been done following the consultation.

To section 40

The wording “lowest operational temperature” in the first paragraph must be viewed in context of the Regulations of 4 September 1987 No. 856 on the construction of mobile offshore units⁴ section 7, and is a reminder of the requirements of the Regulations on construction of ships. On a number of occasions, the NMA has been made aware of the fact that this is often not included in evaluation when selecting foam concentrate.

To section 41

The headline has been changed compared to the draft Regulations.

It is specified in the third paragraph (a) that the CO₂ extinguishers must be fitted with an extension hose and nozzle. The wording mirrors the intention of the requirement in a better way and corresponds to the practice.

The delivery capacity requirement in the third paragraph (b) provides a specification compared to section 38 tenth paragraph of the Helicopter Deck Regulations of 2008, and 10 minutes will correspond with NORSOK S-001.

To section 42

The requirement of having two fire-resistant blankets stipulated in section 38 eleventh paragraph of the Helicopter Deck Regulations of 2008 has been interpreted and met in different ways. Because of this, it is specified in (n) that two fire-resistant blankets must be part of the emergency equipment. This is an additional requirement to the requirement for fire-fighting equipment, cf. the Fire Protection Regulations section 13 (2.8).

⁴ Hereinafter referred to as the Construction Regulations.

To section 43

The requirement of the 2008 Helicopter Deck Regulations section 39 fourth paragraph second and third sentences is not continued. This is included in the safety management system of the unit as well as the requirement for the maintenance system, and the NMA sees no need to regulate this separately.

Based on comments received during the consultation, we have not laid down the requirement that “if the fuelling facility is placed above a living quarter module, all exterior surfaces of the module that may be exposed to hydrocarbon fire shall be insulated to class A-60 standard”. For Norwegian mobile offshore units, however, the Fire Protection Regulations section 4 and the Risk Analyses Regulations⁵ apply.

The reference to the IMDG Code of the circulated proposed Regulations and the 2008 Helicopter Deck Regulations has not been continued. How fuel tanks should be constructed and transported is set out in the legislation for the carriage of dangerous goods on ships⁶. Therefore, it is the NMA's assessment that it is not necessary to lay down the same requirements in these Regulations.

The eighth paragraph continues section 39 seventh paragraph with a specification that it may also apply to other accidents.

The tenth paragraph continues section 39 eighth paragraph up to the first comma. The remaining wording in the eighth paragraph is not continued since this will already be covered by section 36. The helicopter operator is the person to approve the system.

Section 39 twelfth paragraph of the Helicopter Deck Regulations of 2008 is continued in section 43 eleventh paragraph, but with updated requirements. Having a procedure is not sufficient to meet this requirement. There must be safety instructions with a list of items for the safe and responsible filling of fuel, including for example earth cable, valves, fuel filler hose.

To section 44

As a starting point, the requirements of the Regulations shall be met. Only in extraordinary cases, where warranted by valid grounds and the shipping company establishes that it is justifiable in terms of safety, there will be an opening for making a decision to exempt. Companies applying for exemptions are not entitled to have these granted even if the terms of the exemption provision are met. The NMA will have an exemption practice in line with the current practice. A statement from the safety representative(s) shall be attached the shipping company's application for exemption.

To section 45

Nevertheless, the NMA has chosen to include the regular transitional provision for mobile offshore units in the first paragraph.

Since the requirement for status lights in section 31 fifth paragraph only will apply to drilling units, there will be no need for a specific transitional provision for this.

In the second and third paragraphs, the date has been changed compared to the circulated Regulations.

Economic and administrative consequences

The Norwegian Maritime Authority mainly refers to the Norwegian Civil Aviation Authority's impact assessment concerning the requirements of chapters 2 to 7, which correspond with

⁵ Regulations of 22 December 1993 No. 1239 on risk analyses for mobile offshore units

⁶ Regulations of 1 July 2014 No. 944 on dangerous goods on Norwegian ships

requirements of the Norwegian Civil Aviation Authority's regulations, see the Norwegian Civil Aviation Authority's consultation document dated 28 May 2018, reference 18/02954-6. Beyond the consequences that are discussed here we have the following additions.

As for the requirement in section 24 fourth paragraph of the Regulations, we have been informed that the cost per windsock is between NOK 1000 and 2500 depending on the quality and material.

Following the consultation, a relaxation has been made to the requirement of section 31 fifth paragraph, so that this requirement only will apply to drilling units. As far as we know, these comply with the MODU Code, which means that they have installed status lights. The requirement will therefore not imply increased costs for the industry.

The requirement of section 37 first paragraph, which has been amended compared to the requirement of the Helicopter Deck Regulations of 2008 concerning the delivery capacity of the foam system from 5.5 to 6 litres, will not have negative consequences for the industry as far as we know, since all the Norwegian mobile offshore units already meet this requirement. The new requirement in section 37 fifth paragraph and section 38 (a) second sentence will not have consequences for mobile offshore units already equipped with fire-fighting foam systems with oscillating foam monitors. The possibility to use a foam system with oscillating foam monitors has previously been granted by dispensation, with this as terms for the dispensation.

We presume that the Regulations will not have significant financial or administrative consequences for the authorities.

Lars Alvestad
Acting Director General of Shipping and Navigation

Linda Bruås
Acting Head of Department

This document has been electronically approved, and therefore does not contain handwritten signatures.