

091 – Offshore Norge

Recommended Guidelines – Supply chain security for offshore facilities

FOREWORD

These Guidelines were developed with broad industry participation from interested parties in the Norwegian offshore industry and are owned by the Norwegian offshore industry, represented by Offshore Norge.

The Guidelines are recommended by the Offshore Norge Security/Cyber Security Specialist Network, HSE Managers Forum and Operations Committee. The Guidelines have been subject to consultation with supply chain specialists.

The authorities - represented here by the Petroleum Safety Authority Norway (PSA) and the Norwegian Coastal Administration (NCA) - have also been consulted.

The Guidelines have been approved by the Director General of Offshore Norge.

Responsibility for the Guidelines within Offshore Norge is assigned to the Technical Director.

Administration has been assigned to Offshore Norge.

Offshore Norge has established an operating company, Offshore Qualific AS, which has been delegated responsibility for security agreements, security audits and administration of Offshore Norge security seals.

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1 INTRODUCTION

1.1 Objective

The objective of these Guidelines is to prevent unauthorised materials and personnel from reaching the offshore facilities via the supply chain.

The Guidelines do not cover the supply chain for air transport, as this area is covered by 003 Offshore Norge Recommended Guidelines for check-in and security checks at helicopter terminals (Norwegian only).

The Guidelines shall contribute to coordinated and consistent implementation of the operating companies' requirements for the security of supplies for the offshore activities.

The Guidelines should be read together with 116 Offshore Norge Recommended Guidelines for packing, securing and transporting cargo, as well as user inspection of load containers (Norwegian only).

The recommended guidelines were established to meet the expectations in the security requirements in Section 9-3 of the Petroleum Act.

The Guidelines represent the industry's joint approach to securing supply of goods and materials used in offshore activities on the Norwegian continental shelf (NCS).

Measures shall be implemented to deter, detect/discover, prevent/delay and handle potential threats and criminal acts.

1.2 Definitions and abbreviations

Asset	Resource which, if subject to undesirable influence, will entail a negative consequence for the entity that owns, manages or benefits from the resource. (Source: NS 5830)
Barrier	A measure intended to identify conditions that may lead to failure, hazard and accident situations, prevent an actual sequence of events occurring or developing, influence a sequence of events in a deliberate way, or limit damage and/or loss. (Source: PSA's Barrier Memorandum 2017)
Baseline security	Combination of security measures that safeguard the enterprise's security requirements under normal conditions. (Source: PST guidelines [Norwegian only]).
Controlled area	Restricted and closed area used to pack, seal and store inspected cargo.

Food article	Any substance or product, regardless of whether or not it is processed, partly processed or unprocessed, which is destined for - or which can reasonably be expected to be - for human consumption.
Freight documentation	Document describing the content of a shipment (e.g. waybill, hazardous goods document and packing slip).
General cargo	Packages, pallets and cargo in irregular lengths. This could be consumables, spare parts, food, clothing, medicines, etc. At terminals, general cargo shipments are packed along with and distributed in shared transport units.
Inspected cargo	Inspected cargo covers all cargo that has been inspected pursuant to the content of these Guidelines.
ISPS code	International Ship and Port Facility Security Code, adopted by the International Maritime Organization (IMO) on 12 December 2002. (Source: NCA Guidelines for the Port Security Regulations [Norwegian only])
Load container	All types of offshore containers, baskets, platforms, tanks and frames used for transporting cargo. The term includes associated slings. (Source: NORSOK R-003 2017)
May	Reserved for basic recommendations.
Offshore facility	Permanent and mobile installations
Offshore Norge	Offshore Norge is an employer and industry organisation for companies with activities related to the NCS.
Offshore Norge security seal	A form of metal or plastic lock which is used to seal a closed load carrier. A security seal cannot be unlocked; it can only be broken. Each individual security seal shall have a unique ID number. Offshore Norge security seals are requisitioned from suppliers approved by Offshore Qualific AS.
Offshore Qualific AS	Company with responsibility for security agreements, security audits and administration of Offshore Norge security seals.
Operating company	Company executing on behalf of the licensee the day-to-day management of the petroleum activities. (Source: PSA's definition of operator)
PFSA	Port Facility Security Analysis

PFSO	Port Facility Officer
PFSP	Port Facility Security Plan
PISAS	Petroleum Industry Security Alert System
Port facility	The area where contact occurs between ship and port. This includes areas such as anchorages, waiting berths and access from the seaboard side, where relevant. (Source: NCA Guidelines for the Port Security Regulations [Norwegian only])
Qualified	A person has the professional skills to carry out a defined type of task, has the necessary competence, has received relevant training/expertise and has reasonable conditions in place to carry out the work task correctly.
Responsible operating company	Operating company that is responsible for operating offshore facilities.
Restricted area	An area where additional access requirements are set beyond access control for the actual port facility. (Source: Section 17 (1) of the Regulations relating to security at port facilities)
Return cargo	Cargo sent from offshore facilities to land.
Sealed load container	Closed load container sealed with Offshore Norge security seal(s).
Security	Use of security measures to deal with the risk associated with deliberate undesirable incidents. (Source: NS5830)
Security level	The sum of technical, organisational and operational measures/barriers to address a defined threat.
Security measures	Barriers to reduce the risk associated with deliberate undesirable acts. Security measures should comprise both technical, organisational and operational barriers.
Security officer	The enterprise's formal contact in security-related issues addressed in Offshore Norge Recommended Guidelines 091.
Security plan	A set of procedures governing the establishment and maintenance of security and emergency preparedness measures at baseline and elevated security levels for one or more enterprises. When multiple enterprises are involved, the security plan shall be formalised by the agreement partners.
Security risk analysis	Systematic approach for describing and calculating risk.

	<p>In this context, risk analysis is addressed specifically for the security-related risk of intentional undesirable acts and is referred to in the following as a security risk analysis. (Source: NS5814)</p>
Security target	<p>Established targets for safeguarding assets. A security target is a clearly worded intent to achieve a desired future condition or end result, which an organisation is planning to achieve. (Source: NS 5814:21)</p>
Shall	<p>Means that something is statutory, regulatory or clearly established professionally such that it will rarely be prudent not to do what is recommended.</p>
Shipment	<p>Cargo, with associated freight documentation, which is sent through a supply chain.</p>
Should	<p>Reserved for strong recommendations but must then be followed up by text that allows for the possibility of a different solution subject to professional review.</p>
Supplier	<p>Enterprise which delivers supplies or base services to operating companies or via other relevant supplier businesses.</p>
Supply base	<p>Base service supplier, which handles receipt, verification, packing, security, sealing, storage and transport of cargo via vessels to the offshore facilities.</p>
Supply chain	<p>Resources that are necessary to ensure that supplies reach the offshore facilities. Such a supply chain consists of suppliers, road transporters, supply bases, supply vessels and offshore facilities.</p>
Threat	<p>Intentional act which may lead to an undesirable incident (Source: NS5814)</p>
Vulnerability	<p>Inability to resist/withstand a deliberate undesirable act or establish a new stable condition should an asset be subject to an undesirable influence. (Source: NS5830)</p>
116 Recommended Guidelines	<p>116 Recommended Guidelines for packing, securing and transport, as well as user inspection of load containers (Norwegian only)</p>

1.3 References

- Section 9-3 of the Petroleum Act - Emergency preparedness against deliberate attacks
<https://www.npd.no/en/regulations/acts/act-29-november-1996-no2.-72-relating-to-petroleum-activities/#Section-9-3>
- The PSA's Framework Regulations
<https://www.ptil.no/en/regulations/all-acts/?forskrift=158>
- The PSA's Management Regulations
<https://www.ptil.no/en/regulations/all-acts/?forskrift=611>
- The NCA (maritime security) [Norwegian only]
<https://www.kystverket.no/sjotransport-og-havn/havnesikring/hva-er-maritim-sikring/>
- Regulation No. 538 of 29 May 2013 relating to security of port facilities (Norwegian only)
<https://lovdata.no/dokument/SF/forskrift/2013-05-29-538>
- Regulation No. 539 of 29 May 2013 relating to port security (Norwegian only)
<https://lovdata.no/dokument/SF/forskrift/2013-05-29-539>
- The NCA's Guidelines for the Port Security Regulations (Norwegian only)
<https://www.kystverket.no/sjotransport-og-havn/havnesikring/veiledere-brosjyrer-skjema-maritim-sikring/>
- The NCA's Guidelines for conducting port security assessments (PSAs)
<https://www.kystverket.no/contentassets/c278fd44d239496ba1ff5eaf20a8858d/veileder-for-utarbeidelse-av-sikringsrisikoanalyse-for-havn.pdf>
- Lovdata, consolidated EU Regulation 725/2004
<https://lovdata.no/static/NLX3/32005l0065.pdf>
- 116 Offshore Norge – Recommended Guidelines (Norwegian only).
<https://www.offshorenorge.no/contentassets/a9b7533b85504134a0fbc58c4e95662b/116---retningslinjer-for-pakking-sikring-og-transport-av-last-samt-kontroll-av-lastbarere.pdf>
- Act relating to national security (the Security Act)
<https://lovdata.no/dokument/NLE/lov/2018-06-01-24>

2 SECURITY RISK ANALYSIS, SECURITY MEASURES AND SECURITY PLAN

Managing risk is an important activity to ensure that unauthorised materials and unauthorised personnel do not reach the offshore facilities.

Planned risk management requires a comprehensive understanding of the supply chain and its vulnerabilities and threats.

Risk management shall contribute to and help support the management's decision-making process.

2.1 Management system requirements

All enterprises involved in the supply chain leading up to offshore facilities shall have a system that describes how the activities are managed.

The management system shall cover how security is safeguarded in the supply chain. The management system shall also describe processes which verify that the security in the enterprise is in accordance with relevant statutes and regulations in the area. The management system should be constructed pursuant to recognised standards and norms.

As a minimum, the enterprise's management system shall safeguard the following:

Organisation and leadership

- Security shall be an integrated part of the enterprise's management system and shall demonstrate a clear allocation of responsibilities, organisation and relationships with other regulations and guidelines with security requirements. It is recommended that all enterprises establish clear targets for security and security awareness, assign necessary resources, and assess their security status annually. This shall be documented.
- A policy shall be established for the security activities (including processes and procedures).
- The enterprise's management system shall safeguard physical security, personnel security and IT security.

Security risk analysis and security plan

- A process and method shall be established to identify and assess security risk. Correspondingly, a security plan shall also be established.

Competence

- Requirements shall be established for competence and documented training for all personnel whose task/responsibility description includes security.

Training and security drills

- A plan shall be established for conducting training and security drills.

Audits

- A system shall be established for auditing the enterprise's management system.

Reporting, registration and administrative procedure

- A system shall be established for reporting and registration as well as the administrative procedure for security incidents.

2.2 Security risk analysis

A comprehensive understanding of risk is crucial in order to achieve the objective of these Guidelines.

Operating companies, suppliers with a security agreement and supply bases with a security agreement shall conduct a security risk analysis.

The security risk analysis shall be updated in the event of significant changes in the risk scenario and should otherwise be updated every five years. The companies shall have a system enabling them to continuously identify changes that are significant.

The security risk analysis shall describe the flow of goods and activities related to this flow.

The security risk analysis shall identify threats, vulnerabilities, consequences of potential incidents, as well as describe which measures shall be in place to manage the risk.

Through the security risk analysis, the enterprise shall consider and establish security measures for baseline security and additional measures for all security levels, as this is described in Appendix 1 for helicopter terminals and supply bases, as well as Appendix 2 for suppliers with a security agreement.

Appendix 1 and Appendix 2 also describe various measures that shall be considered for the security levels.

Appendix 1 and Appendix 2 are only available to the respective parties in the supply chain.

It is important that the participants conducting the security risk analysis cover all relevant disciplines and that all relevant parties are involved, including operating companies.

The safety delegate service shall be invited to participate in the work on the security risk analysis.

In addition to covering the enterprise, the security risk analysis shall incorporate an assessment of how the enterprise's activities may affect the security risk for other parts of the supply chain.

As a minimum, the security risk analysis shall cover the controlled area, receipt and inspection, packing and Offshore Norge seals, storage, transport and loading on vessels. See Figure 3.1.

A security risk analysis should describe the following (this list is not necessarily complete):

- The requirements (regulations, etc.) used as a basis
- The objective and parameters of the analysis
- Security targets
- The system/entity/enterprise under review
- Assets, threats and vulnerabilities
- Scenarios
- Strength of knowledge
- Prerequisites and assumptions
- Security measures based on identified risk
- Risk
- The method used
- Overview of roles and disciplines that have participated in the work to prepare the security risk analysis

Supply bases that are subject to the ISPS code are required to conduct a security risk analysis and establish a security plan that satisfies § 9 and § 10 of the Regulations relating to security at port facilities. Such a security risk analysis with associated security plan may be used as a basis for satisfying the recommendations described in these Guidelines.

The result of the security risk analysis and associated security plan shall, upon request, be presented to the operating company and Offshore Qualific AS.

2.3 Security measures

Both baseline security measures and additional measures shall be established on the basis of the security risk analysis.

Baseline security means the established, verified and documented security measures set to address security risk in a normal situation.

Additional measures are measures that the enterprise shall be able to implement in the event of an elevated security level and in situations where baseline security measures are insufficient.

Baseline security measures shall be of such a nature that additional measures can be implemented immediately in the event of an elevated security level.

When security measures are established, the enterprise shall consider a combination of technical, organisational and operational barriers.

The measures shall strive to safeguard the functions of deterrence, detection/discovery, prevention/delaying, handling and restoration.

As a minimum, baseline security measures shall safeguard the following:

- Personnel administration measures (such as background checks)
- Access control (personnel and vehicles)
- Perimeter security
- Surveillance
- Inspecting cargo

- Storage
- ICT security¹

2.4 Security plan

Suppliers with a security agreement and supply bases with a security agreement shall establish a security plan.

The security plan shall describe the security system that has been established to prevent unauthorised cargo and personnel from reaching the offshore facilities. The security plan shall be updated as a result of new knowledge, experience, incidents and changes.

The security plan shall also be revised when changes occur in the security risk analysis or in other factors relevant to security.

As a minimum, a security plan should contain the following:

- Description of the security organisation, roles, responsibilities and tasks
- Description of threats
- Description of security scenarios and how they are handled
- Description of security measures for baseline security
- Description of additional measures to handle a change in the security level or an elevated security risk
- Description of how training and drills are handled
- Description of how reporting and registration as well as the administrative procedure for security incidents is handled
- Description of audit and continuous improvement processes
- Description of how changes and improvements are implemented and communicated

The security plan shall be forwarded to the operating company and Offshore Qualific AS upon request.

¹ Data security measures may be described in separate documents from the IT department.

3 THE SUPPLY CHAIN

The supply chain is established to ensure that cargo is transported securely out to the offshore facilities in accordance with a plan.

Control procedures are established to ensure that cargo which is sent through the supply chain matches the content of the freight documentation.

The flow of goods from suppliers to the offshore facilities is described in Figure 3.1.

Cargo from suppliers is transported to suppliers with a security agreement or to supply bases with a security agreement.

Some cargo is transported in closed load containers with Offshore Norge seals.

Some cargo is transported in open load containers, tanks or as separate pipe shipments.

Suppliers with a security agreement and supply bases with a security agreement should store inspected cargo in a controlled area. Inspected cargo covers all cargo that has been inspected pursuant to the content of these Guidelines.

Supply bases with a security agreement usually also have a restricted area which is subject to the regulations from the NCA.

Figure 3.1 is a simplified diagram that shows how the different areas and zones relate to each other at a hypothetical location. Security in the supply chain presumes a shared comprehensive understanding of the supply chain and varying conditions at the different localities.

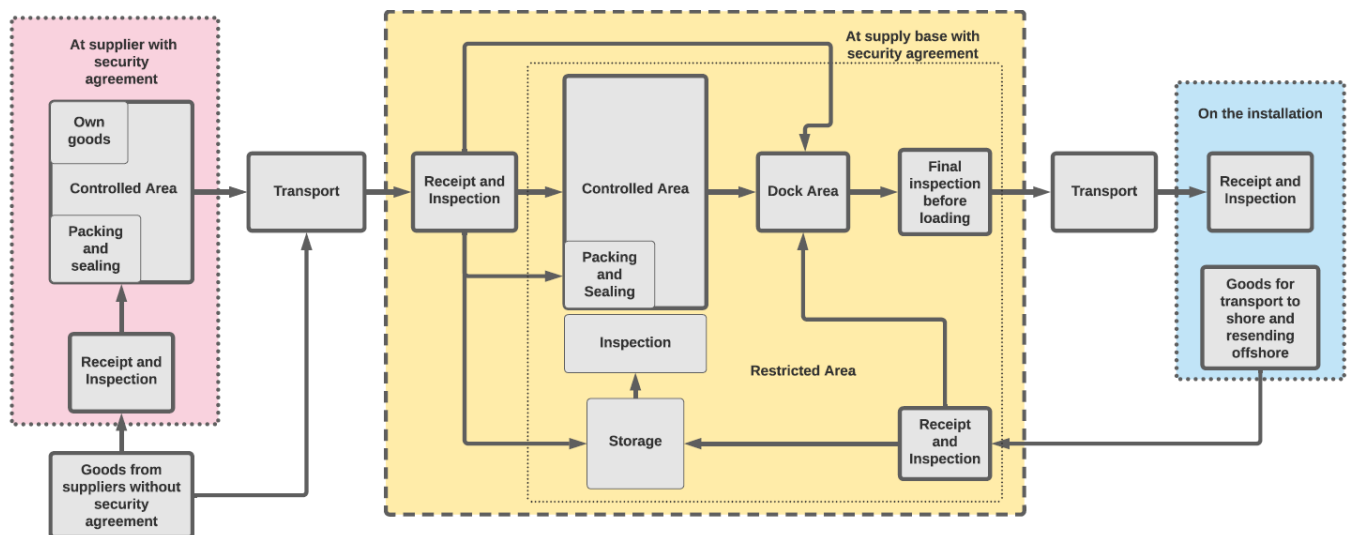


Figure 3.1 Security in the supply chain

The following chapters contain explanations for Figure 3.1:

3.1 Controlled area

A controlled area shall:

- Ensure that unauthorised personnel do not have access to inspected cargo
- Be used for inspection, packing and Offshore Norge sealing
- Be used to store inspected cargo

Suppliers with a security agreement and supply bases with a security agreement shall have access to one or more controlled areas.

3.2 Restricted area

A restricted area is a port area that is governed pursuant to the international regulations for securing ships and port facilities against intentional undesirable acts. Figure 3.1 illustrates the restricted area with a dotted line.

This area may vary depending on local circumstances at the supply bases. The security risk analysis provides a basis for considering whether a 'restricted' area and a 'controlled' area may apply to the same area.

3.3 Receiving and inspection

Suppliers with a security agreement and supply bases with a security agreement shall have established procedures for receiving and inspecting cargo.

The receiving and inspection procedure shall ensure that the load container is intact, the seal is intact, the seal is correctly installed and that the seal bears a correct Offshore Norge seal ID number in accordance with the freight documentation.

3.4 Goods from suppliers without a security agreement

Suppliers without a security agreement shall deliver goods for inspection, packing and sealing at either a supplier with a security agreement, a supply base with a security agreement or an operating company.

3.5 Goods from suppliers with a security agreement

Suppliers with a security agreement may pack, seal with an Offshore Norge seal, and transport load carriers directly to the supply base.

3.6 Transport

Transporters shall have established procedures for securing shipments during transport and stops.

Suppliers/operating companies shall verify that the transporters' procedures for securing cargo during transport from supplier to supply base have been implemented.

The Norwegian Public Roads Administration (NPRA) has the authority to inspect cargo during road transport. As regards closed load containers with Offshore Norge seals, this may entail that Offshore Norge security seals are broken during such an inspection.

The NPRA uses its own seals to re-seal closed load containers once the inspection is complete.

In such instances, the enterprise shall verify that the NPRA seal is still intact upon arrival at the supply base.

The contents shall be inspected as if it were an unsealed load carrier.

The load container shall then be sealed with a new Offshore Norge security seal.

In the event that the NPRA conducts an inspection, the driver shall notify the goods reception and inform them about broken Offshore Norge security seals. Such information shall also be noted in the freight documentation.

3.7 Inspection, packing and sealing with Offshore Norge seals

All suppliers with a security agreement and supply bases with a security agreement shall have a system for inspection and security of shipments during packing.

When warehouses are used for inspection, packing and sealing, the security risk analysis shall contain identified security measures.

3.8 Return cargo for new shipment to an offshore facility

Return cargo that is returned from an offshore facility. This cargo can be sent out to another facility or be re-sent to the same offshore facility.

Supply bases with a security agreement shall have a system for receiving, inspection and storage of return cargo.

Following a receiving inspection of the content of a sealed load container, the load container shall be sealed with an Offshore Norge security seal. The load container should then be stored in a controlled area until the load container is forwarded to another or the same offshore facility.

If a load container sealed with an Offshore Norge seal is stored outside a controlled area, the Offshore Norge seal shall be verified before the load container is loaded on board a vessel. At the same time, the load container shall be subject to external inspection for loose/foreign objects.

3.9 Storage at supply bases

Once the receiving inspection is complete, the load container should be kept in interim storage in a controlled area until it is loaded on board a vessel.

Load containers with an Offshore Norge seal which are stored in a controlled area may be transported to a vessel without further inspection.

When load containers and tanks with an Offshore Norge seal are stored outside a 'controlled' area, the load container shall be subject to external inspection for loose/foreign objects, and the Offshore Norge seal ID number shall be verified against freight documentation before the load container may be loaded on board a vessel.

Open inspected load containers, including the cargo, which are stored in a controlled area may be transported to vessels without further inspection.

Open uninspected / inspected load containers, including the cargo, which are stored outside a controlled area shall be fully inspected before they are loaded on board a vessel.

When a tank is stored outside a controlled area, the seals on the tank shall be verified against freight documentation before the tank is loaded on board a vessel. At the same time, the tank and tank skid shall be subject to external inspection for loose/foreign objects.

3.10 Loading on vessels

Loading on vessels shall be carried out within a restricted area in accordance with the Regulations relating to security at port facilities.

If load containers and tanks with an Offshore Norge seal are stored outside a 'controlled' area, the load container shall be subject to external inspection for loose/foreign objects, and the Offshore Norge seal ID number shall be verified against freight documentation before the load container may be loaded on board a vessel.

Load carriers shall be handled in a manner which ensures that Offshore Norge security seals are not damaged during lifts or transport.

4 LOAD CARRIERS, GENERAL CARGO, PIPES AND TANKS

Different types of cargo are subject to different inspection routines to safeguard the established security level.

For certain types of hazardous goods, there are special competence requirements for opening and inspecting the cargo.

All suppliers/transporters shall deliver cargo to the receiver's goods reception during normal or agreed opening hours for receiving inspection and signature. Qualified inspections in connection with receipt at the supply base are important in order to ensure the integrity of the cargo. The inspection shall be carried out by qualified personnel.

4.1 Open load containers

In the event that it is possible to place foreign objects in the cargo hold or influence the integrity of the cargo, the load container shall, by definition, be classified as an open load container. One example of such a load container is a basket.

Control procedures shall be established for inspecting all open load containers that arrive at a supply base.

The objective of this inspection is primarily to verify that there is no unauthorised cargo, personnel or foreign objects.

Once the inspection and registration of the received goods is complete, open load containers should be stored in a controlled area if the cargo is not taken directly to a vessel.

The following shall be carried out during a qualified inspection of open load containers:

- Check that the freight documentation and content of the received cargo match, and that the cargo and load carrier are free of foreign objects.
- Visually inspect all cavities on the load container, for example fork pockets
- Check whether other cargo is blocking a load container's cavities, and if so, the cargo shall be moved
- Check how the cargo is secured, including tightening up cargo straps, etc.

4.2 Sealed closed load containers

Suppliers with a security agreement and supply bases with a security agreement shall have an established procedure for inspection, packing and Offshore Norge sealing of closed load containers.

This procedure shall be described in the security plan.

Suppliers without a security agreement may deliver general cargo to supply bases with a security agreement, suppliers with a security agreement and operating companies for their inspection and further packing in load carriers.

Operating companies, suppliers with a security agreement and supply bases with a security agreement shall seal closed load containers with Offshore Norge security seals.

There shall be an established procedure for conducting random inspections of sealed load containers upon arrival at a supply base. Random inspections shall be conducted each day load containers with an Offshore Norge seal are received.

The number of sealed load containers subject to inspection shall be addressed in the security risk analysis and is further described in Appendix 1 to these the Guidelines.

Appendices to these Guidelines are not published on the Offshore Norge website. Please contact Offshore Norge if a copy is needed.

Offshore Norge security seal ID shall be checked against the ID number in the freight documentation.

Once goods reception completes a random inspection and registers the load container, the sealed load container should be stored in a controlled area.

Random inspections shall be determined in a random/automatic fashion, and it shall be possible to document at any given time that sealed load containers have been subjected to random inspection.

As a minimum, this documentation shall contain the following information: load carrier ID no., inspection date and result of inspection.

A random inspection involves the following:

- Check that the freight documentation matches the number of items
- Check some of the actual contents of the cargo. The part of the cargo chosen for random inspection shall be opened and fully inspected for foreign objects
- Visually inspect all cavities on the load container, such as fork pockets
- Check that the cargo is correctly secured, including re-tightening cargo straps

4.3 Unsealed closed load containers

The following shall be done during an inspection of all unsealed closed load containers at supply bases with a security agreement:

- Check that the freight documentation matches the content of the received cargo
- Check that the content of the received cargo is free of foreign objects
- Visually inspect the load container and all its cavities for foreign objects or loose objects
- Check that the cargo is correctly secured, including re-tightening cargo straps

4.4 General cargo

General cargo that arrives at a supply base with a security agreement or a supplier with a security agreement shall be inspected as follows:

- Check that the freight documentation matches the content of the received general cargo
- Check that the content of the received cargo is free of foreign objects
- Inspection guidelines are provided in Appendix 1 and Appendix 2

4.5 Pipes

This chapter covers fully strapped pipes that will be transported directly onto the vessel deck.

Pipes from suppliers without a security agreement shall be delivered with documentation, prepared and security-inspected to a supply base with a security agreement.

Supply bases with a security agreement shall inspect the pipe delivery before the pipes may be transported into a controlled area or directly to a vessel.

Pipes that have been inspected and delivered from a supplier with a security agreement, and which belong inside the supply base, may be taken directly into a controlled area or directly to a vessel.

Supply bases with a security agreement shall conduct random inspections of these pipe shipments.

The following shall be done by supply bases with a security agreement during a pipe inspection:

- Check that the freight documentation matches the pipe delivery
- Visually inspect for foreign objects
- Inspection guidelines are described in Appendix 1

4.6 Tanks

This chapter is primarily for tanks of the size of "certified lifting units".

Other types of smaller tanks are presumed to be packed in closed or open load carriers. Suppliers of tanks that are "certified lifting units" should have a security agreement.

Tanks may, for example, contain helicopter fuel.

If there is a need for a more extensive inspection of a tank and its contents upon arrival at a supply base, a representative from the supplier shall be asked to conduct the inspection along with a representative from the supply base.

The following shall be inspected before a tank is taken into a controlled area:

- Check that valves, manhole covers and equivalent "openings" are sealed with Offshore Norge seals
- Check that the ID numbers of the Offshore Norge seals match the ID references in the freight documentation
- Visually check that the exterior of the tank and tank skid are free of foreign / loose objects and that the tank is free of deformations/leaks.

4.7 Other cargo

This chapter covers other types of cargo, such as subsea equipment, templates and structures with total dead weight exceeding 2.5 tonnes.

The following shall be inspected before the unit is taken into a controlled area:

- Check that the content of the freight documentation matches the delivery
- Visually check that the unit is free of attached and loose foreign objects

5 OFFSHORE NORGE SECURITY SEALS

Offshore Norge security seals shall be used to seal all types of closed load containers that will be transported to the offshore facilities.

Only the operating companies, suppliers with a security agreement and supply bases with a security agreement are allowed to seal load containers with Offshore Norge security seals.

Offshore Qualific AS shall follow up and ensure that users and the manufacturer of Offshore Norge security seals comply with applicable requirements at all times. Offshore Qualific AS carries out this responsibility on behalf of the operating companies.

5.1 Requirements for users of Offshore Norge security seals

Offshore Norge security seals shall be produced by a manufacturer designated by Offshore Qualific AS. Only one such manufacturer can produce Offshore Norge security seals at any given time.

Only personnel appointed by operating companies, suppliers with a security agreement and supply bases with a security agreement may requisition Offshore Norge security seals from the manufacturer. The requisition takes place in accordance with the relevant procedure described by Offshore Qualific AS. Any changes in appointed personnel shall be communicated to Offshore Qualific AS.

Security seals shall be stored under lock and key and be inaccessible to unauthorised personnel. Unauthorised personnel shall have no access at any time to security seals that are checked out for daily use.

A log shall be kept for Offshore Norge security seals. The log shall be updated continuously as the seals are used.

The involved operating companies and involved offshore facilities shall be notified immediately if any irregularities are discovered – for example such as loss or theft of Offshore Norge security seals.

Operating companies and involved offshore facilities shall also be notified in the event of the following:

- Foreign objects are discovered inside, under or on a load container.
- Removed or broken/damaged security seals on a load container.
- Other factors that raise suspicion of irregular activity.

If any discrepancies are identified between the actual inventory of Offshore Norge security seals and the log, this shall be reported immediately to Offshore Qualific AS for mapping and registration.

The missing security seal numbers shall be declared void and Offshore Qualific AS shall immediately inform:

- Supply bases
- Supply vessels
- Offshore facilities

When a security agreement is terminated or expires, unused seals and logs shall be forwarded to Offshore Qualific AS within one week of termination/expiration. Offshore Qualific AS shall have a system to follow up and ensure that suppliers with a security agreement and supply bases with a security agreement return unused seals and logs to Offshore Norge within one week of the expiration of the security agreement.

5.2 Requirements for the manufacturer of Offshore Norge security seals

The manufacturer of Offshore Norge security seals shall only deliver Offshore Norge security seals to operating companies, suppliers with a security agreement and supply bases with a security agreement.

Offshore Qualific AS shall keep the manufacturer up to date on which companies have a security agreement and any other changes in order to ensure that Offshore Norge security seals cannot be used by companies without a security agreement. The manufacturer shall follow the relevant procedure for ordering Offshore Norge security seals at all times.

Offshore Qualific AS shall be notified immediately in the event of irregularities, such as loss or theft of Offshore Norge security seals, or in the event of other factors that raise suspicion of irregular activity.

The manufacturer of Offshore Norge security seals is responsible for logging the number series which have been manufactured and delivered to operating companies, to supply bases with a security agreement and to suppliers with a security agreement.

Offshore Qualific AS shall conduct annual audits of the manufacturer's system for production, inspection and storage of security seals. Operating companies may also conduct their own audits or participate in Offshore Qualific AS' audits.

6 SECURITY AGREEMENTS

In order to plan standardised inspections of supplies for the offshore facilities, Offshore Qualific AS shall enter into security agreements on behalf of the operating companies with selected suppliers and supply bases.

The security agreement has a standardised format and content as described in Appendix 3.

Offshore Qualific AS shall, in consultation with the operating companies, assess which suppliers and supply bases should have a security agreement.

This means that suppliers and supply bases shall primarily be assessed in relation to the scope and type of deliveries.

An operating company shall be the primary contact for each individual security agreement, which is entered into with a supplier and a supply base.

An overview of suppliers and supply bases with valid security agreements can be found at www.offshorenorge.no.

6.1 Suppliers without a security agreement

Suppliers without a security agreement shall be able to document procedures and work processes that ensure planned and secure shipments of cargo to a supply base with a security agreement, a supplier with a security agreement or an operating company.

Procedures and work processes shall also be in accordance with 116 Offshore Norge Recommended Guidelines.

6.2 Suppliers with a security agreement and supply bases with a security agreement

Suppliers with a security agreement and supply bases with a security agreement shall comply with the content of these Guidelines.

The security agreement entitles the enterprise to use Offshore Norge security seals to seal inspected load containers that will be used in activities addressed in these Guidelines.

When this is stated in the security agreement, suppliers with a security agreement and supply bases with a security agreement may receive, inspect, pack, seal and store of cargo on behalf of suppliers without a security agreement.

In these instances, the security risk analysis shall cover the risk associated with receiving, inspecting, packaging and sealing cargo from others.

The security plan shall describe specific security measures for this activity.

Security agreements are in force for 3 years.

The supplier or the supply base is itself responsible for renewing the security agreement by contacting Offshore Qualific AS.

The renewal process shall be initiated no later than 6 months before the agreement expires.

In the event of unforeseen circumstances, the agreement may be extended by up to 3 months following an application to and approval from Offshore Qualific AS.

6.3 Security audits

Security audits are conducted at suppliers with a security agreement and supply bases with a security agreement.

Security audits are conducted under the auspices of Offshore Qualific AS in accordance with ISO 19011. Representatives from operating companies may participate as needed and desired.

The purpose of security audits is to verify that relevant requirements in statutes, regulations, and these Guidelines are followed.

The focus shall be on the quality of the security risk analysis, compliance with the security plan and how the content is continuously assessed and revised.

If non-compliance is identified during a security audit, the identified non-compliance shall be resolved by the renewal date.

A security audit shall be conducted in connection with renewing a security agreement, no later than 3 months before the agreement expires.

A security audit shall also be conducted in connection with establishing a security agreement.

All relevant operating areas at the local audit object shall be physically verified / inspected.

Suppliers with a security agreement may expect unannounced follow-up activities at their locations during the agreement period.

7 REQUIREMENTS FOR PARTIES ENTERING INTO SECURITY AGREEMENTS

The following requirements apply for suppliers with a security agreement and supply bases with a security agreement.

7.1 Requirements for suppliers with a security agreement and supply bases with a security agreement

- a) Suppliers with a security agreement and supply bases with a security agreement shall appoint a contact for security issues (security manager). The security manager shall ensure compliance with the security agreement.
- b) Offshore Norge security seals shall be stored under lock and key, and access to the security seals shall be limited. All Offshore Norge security seals that are taken out for use shall be logged with a seal number, date and signature. At the end of the workday, unused Offshore Norge security seals shall be returned to their locked storage, and the Offshore Norge security seals shall be logged in the same manner as when they are taken out. Unused Offshore Norge security seals shall remain under control and secured against theft. It shall be possible to document an overview of the security seal inventory at all times.
- c) The security manager may delegate the tasks of storing and handing out Offshore Norge security seals, as well as inspecting and sealing cargo, to select personnel within the same enterprise. This presumes that sufficient documented training has been provided.
- d) Cargo shall only be packed in load carriers if it is in accordance with the received freight documentation.
- e) The ID number of the Offshore Norge security seal shall be stated in the freight documentation.
- f) The receiver shall verify the ID number of the Offshore Norge security seal against the stated seal ID number in the freight documentation.
- g) The load containers shall be under supervision while packing is under way. If the supplier/supply base suspends the packing and leaves the packing site temporarily, the load container shall be secured to preserve the load container's integrity. If an unsealed load container has not been under continuous supervision or the Offshore Norge security seal has been manipulated/broken/damaged, the load container and cargo shall be re-inspected before it is sealed and sent from the supplier/supply base.
- h) Before a load container is transported from a supplier/supply base, it shall be subject to external inspection for loose/foreign objects and to ensure that the seal is unbroken.

- i) If the Offshore Norge security seal on a load container is removed, broken or damaged before transport, the load container shall be stopped, and all content shall be re-inspected. The same procedure shall be carried out if the ID number of the Offshore Norge seal does not match the freight documentation from the supplier. The original supplier shall be notified, and the content shall be re-inspected.
- j) The supply base shall notify suppliers with a security agreement if the Offshore Norge security seal has been broken, removed or damaged, and if the ID number of the Offshore Norge security seal does not match the freight documentation upon arrival at or during stays at the supply base. The supplier shall then inspect the load container and cargo together with the supply base before the load container is re-sealed. This inspection shall be conducted in person or be based on information from the supply base in the form of photos, videos or verbal descriptions.
- k) In the event of burglary or suspicions of burglary at the warehouse or in areas where sealed load containers are stored, the load containers shall be re-inspected for manipulated/broken/damaged Offshore Norge security seals and for foreign objects.
- l) The responsible operating company and involved offshore facilities shall be notified immediately in the event of irregularities such as loss/theft of Offshore Norge security seals, if foreign objects are discovered inside, under or on a load container, removed/broken/damaged Offshore Norge security seals on load containers, or in the event of other factors that raise suspicion of irregular activity.
- m) Suppliers and supply bases shall also comply with the content of 116 Offshore Norge Recommended Guidelines.
- n) Suppliers of chemicals and other fluids are responsible for verifying the content themselves before transport to a supply base.
- o) If received return cargo shall be prepared at the base for re-shipment offshore, the same receiving, inspection, document and security seal requirements will apply as described in these Guidelines.
- p) The operating companies should have access to the PFSO's PFSA and the PFSP for the port facility in order to familiarise themselves with the content of the measures.

7.2 Requirements for operating companies

The operating companies have the ultimate responsibility for the security of all shipments to be transported to their respective offshore facilities.

- a) In the event of undesirable incidents, an operating company may notify other operating companies and other stakeholders via PISAS. PISAS notifications may lead to a change in the security level, which in turn will lead to the implementation of additional measures.

- b) Operating companies which carry out receiving, inspection, packing and sealing of cargo themselves shall comply with same requirements as for suppliers with a security agreement and supply bases with a security agreement. This includes conducting a security risk analysis, establishing a security plan and implementing security measures.
- c) Operating companies shall inform Offshore Qualific AS about the operating areas/addresses that are used for receiving, inspection, packing and sealing.
- d) Operating companies shall appoint a security manager and personnel who may order Offshore Norge security seals. This overview shall be communicated to Offshore Qualific AS and be kept up to date in the event of changes.
- e) Operating companies shall verify that the chosen transporters' procedures for securing cargo during transport from supplier to supply base have been implemented.
- f) Operating companies shall specify security requirements in the contract and ensure that the security system works as intended.

7.3 Requirements for Offshore Qualific AS

Offshore Qualific AS administers and facilitates the following tasks on behalf of the operating companies:

- a) Entering into new or renewing existing security agreements with suppliers or supply bases. The duration of the agreement cannot exceed 3 years per agreement period.
- b) Verifying through audits that suppliers and supply bases fulfil the requirements defined in these Guidelines before a security agreement may be entered into.
- c) Conducting announced audits/unannounced random inspections and notifying operators about improvement measures.
- d) Conducting inspections to verify that suppliers with a security agreement and supply bases with a security agreement comply with these Guidelines throughout the duration of the agreement. Offshore Qualific AS shall strive to ensure a coordinated audit practice.
- e) Making the security agreements and audit reports available to the operating companies.
- f) Approving access to order Offshore Norge security seals.
- g) Ensuring that the supplier of Offshore Norge security seals has a correct and up-to-date list at all times of the operating companies', suppliers' and supply bases' security managers, and a list of who can requisition Offshore Norge security seals.

7.4 Requirements for vessels

Vessels that are used to transport cargo to the offshore facilities shall be subject to the ISPS regulations and shall have an ISPS certificate.

Shipping companies and vessels shall have a system for inspecting the cargo while at quay and during transport in order to ensure that foreign objects cannot be placed inside or on load containers.

7.5 Requirements for offshore facilities

When open load containers and other unsealed cargo is received on board the offshore facilities, the facility shall verify that the content matches the freight documentation.

When sealed load containers are received on board the offshore facilities, before opening the load containers, the facility shall verify that the Offshore Norge security seal is intact and that the seal ID number matches the freight documentation. This verification shall be carried out by a qualified person when load carriers are loaded on board the offshore installation.

Once a load container is opened, the content shall be verified against the freight documentation.

Offshore Norge security seals shall not be used on return cargo from the offshore facilities.

Security incidents related to defects in/loss of Offshore Norge security seals or the actual sealing should be handled in the following manner:

- Notify the OIM
- Place the cargo in temporary quarantine on board
- The security manager on board the offshore installation systematically inspects the content of the load container
- This inspection includes a detailed review of the content of the cargo compared with the content of the freight documentation
- Report the security incident in the operating company's system for registration and administration of security incidents
- When necessary, the security manager on board will also seek out factual information from the respective stakeholders in the supply chain
- Information may emerge which indicates that the load container should be sent onshore for inspection

All forms of security incidents and security observations shall be handled, reported, registered and processed in accordance with the operating companies' requirements, e.g. when personnel discover manipulated cargo/foreign objects, manipulated/broken/damaged/lack of Offshore Norge security seals, or in the event of a mismatch between the ID number of the Offshore Norge seal and the ID information in the accompanying freight documentation.

8 COMPETENCE AND TRAINING

Operating companies, suppliers with a security agreement and supply bases with a security agreement shall have a system to ensure that personnel involved in securing the supply chain have relevant security competence and security training.

8.1 Competence requirements

All personnel involved in securing the supply chain shall have a job description. Competence requirements shall be established for each job description. The expertise requirements shall cover general competence for the position, e.g. education, certificates, trade certificate, etc., as well as specific security competence related to security agreements, security plans and security measures. Reference is also made to 116 Offshore Norge Recommended Guidelines and 116 Offshore Norge Plan for training.

8.2 Training requirements

All personnel involved in securing the supply chain shall have completed "on the job training" in accordance with an established plan.

All personnel involved in securing the supply chain shall have completed security training.

It is recommended that personnel involved in securing the supply chain shall have completed the Offshore Norge 091 E-learning course or an equivalent.

This training shall be documented.

8.3 Requirements for training and drills

One security drill shall be conducted annually.

"Tabletop training" is recommended for relevant personnel in advance of each security drill.

These security drills should incorporate varying scenarios, including measures in the event of an elevated security level.

Identified improvement measures shall be documented.

8.4 Requirements for security conversations

Annual security conversations shall be conducted with personnel involved in tasks subject to a security agreement.

Such security conversations shall include reminding personnel that the objective of the security measures is to prevent unauthorised materials and personnel from reaching the offshore facilities via the supply chain.

The content of the security conversation shall promote increased vigilance, provide up-to-date knowledge about security risk, and also serve to reveal gaps in competence.

Completed security conversations shall be documented.

9 RESPONDING TO INCIDENTS

PISAS is the petroleum industry's alert system for serious security incidents. Through PISAS, there may be a need to change the security level, which in turn will lead to the implementation of additional measures.

PISAS alerts may also require specific measures as a result of the threat.

Operating companies, Offshore Qualific AS, suppliers with a security agreement and supply bases with a security agreement shall have a system for reporting, registering, handling and the administration of undesirable security incidents and security observations. See also Chapter 7 of these Guidelines.

Enterprises that are subject to the Regulations relating to security at port facilities shall report security incidents to the NCA pursuant to Section 5 of the Regulations relating to security at port facilities.

In the event that absence or breaches of security measures are identified, immediate action shall be taken to restore the barriers or establish mitigation measures.

Controlled areas shall be inspected, and other mitigation measures shall be proportionate to the relevant barrier breach.

The involved operating companies shall be notified in each instance.

The incident shall be registered in the operating company's system for security incidents.

In the event of breaches of the access provisions for a controlled area/unauthorised activity, authorised personnel, for example a security guard enterprise, shall verify the relevant area.

The controlled area shall be inspected and cleared before normal operations may be resumed.

Sealed load containers whose security seal has been manipulated/broken/damaged, or whose security seal ID number does not match the freight documentation, shall be subject to the following:

- Place the load container in quarantine
- Notify the supplier
- The supplier shall, in cooperation with the supply base, verify that the content of the load container matches the freight documentation before the load container can be re-sealed
- New freight documentation shall then be issued with an up-to-date Offshore Norge seal ID number

If deviations are identified between the actual inventory of Offshore Norge security seals and the log, this shall be reported to Offshore Qualific AS. The missing seal numbers shall be declared invalid.

If unauthorised use of Offshore Norge security seals is discovered, or if prohibited or unauthorised objects are discovered, the involved operating company and Offshore Qualific AS shall be notified immediately.

10 EXPERIENCE TRANSFER AND LESSONS LEARNED FROM SECURITY INCIDENTS

Continuous improvement is an important management element in the regulations and presumes that the parties learn from their own experience and that of others. All parties in the supply chain shall have a system in place for capturing lessons learned. Experience from security incidents that may contribute to shared lessons learned, should be sent to Offshore Qualific AS for assessment. The content of new experience should particularly be considered in connection with conducting security risk analyses.

11 CHANGES

Changes from revision no. 4 to revision no. 5.

Change	Reason
Cleaned up the definitions.	Removed unnecessary definitions, established new ones and clarified existing definitions.
General clarification of language throughout the document.	Reduced time-wasting elements that may form the basis for misunderstandings and unnecessary discussions.
Expanded information about security risk analyses, security plans and security measures.	<p>There was a desire for 091 Offshore Norge Recommended Guidelines to provide better guidance on how a security risk analysis should be conducted and how security measures shall be implemented through a security plan.</p> <p>Clarified how securing the supply chain should be part of the parties' management systems.</p> <p>Deficiencies in management systems have been a consistent finding in previous security verifications (now security audits).</p> <p>This change will normally make it more efficient to coordinate a security risk analysis in accordance with 091 Offshore Norge Recommended Guidelines with the NCA's guidelines for conducting port security assessments (PSAs).</p>
New figure (Figure 3.1) to describe the flow of goods in the supply chain.	<p>The previous figure did not sufficiently cover suppliers with a security agreement.</p> <p>The new figure provides a better overview of the relationship between controlled areas and restricted areas.</p>
<p>New chapter to explain Figure 3.1.</p> <p>Improved the explanation of the relationship between controlled areas and restricted areas.</p>	<p>Using a security risk analysis to assess whether the specified requirements of a restricted area are sufficient compared with a controlled area.</p> <p>The intention has been to facilitate better planning through the use of existing infrastructure.</p>
Suppliers with a security agreement can receive, inspect, pack and seal cargo from	This change provides greater flexibility in the supply chain and should therefore lead to an

suppliers without a security agreement.	<p>increase in efficiency while at the same time maintaining security barriers.</p> <p>Clarified that receiving, inspection, packing and sealing of cargo from others shall be covered by the security risk analysis.</p> <p>This may, for example, contribute to reduced transport costs, and also contributes to less administration for Offshore Norge.</p>
<p>New chapters and new content for handling load containers general cargo, pipes and tanks.</p> <p>Specific measures for the security levels of Baseline Security, A, B, C and D are described in Appendix 1 and Appendix 2.</p>	Acknowledging that different types of cargo require different inspection routines.
<p>Clarified inspection of hazardous goods and pipes.</p> <p>Specific measures are described in Appendix 1.</p>	Clarified security measures at the different security levels.
Introduced the term “qualified inspection”.	<p>Clarified the scope of such inspections and respective qualifications.</p> <p>The meaning of “qualified” is now defined in 091 Offshore Norge Recommended Guidelines.</p>
Clarified requirements for using Offshore Norge security seals.	Clarified how Offshore Norge security seals shall be used, including responsibilities.
Handling sealed load containers that have been inspected by the Norwegian Public Roads Administration along the road.	Described requirements for inspecting Offshore Norge sealed load containers that have been opened and inspected by the Norwegian Public Roads Administration along the road.
Offshore Norge has established an operating company, Offshore Qualific AS, which shall be responsible for e.g. security audits and administration of Offshore Norge security seals.	This change has been clarified in this new version.
Clarified Offshore Norge’s (now Offshore Qualific AS’) roles and responsibilities.	Offshore Norge (now Offshore Qualific AS) has been assigned additional roles and responsibilities in the processes associated with

	<p>securing the supply chain, and this now has a basis in 091 Offshore Norge Recommended Guidelines.</p> <p>The intention is to establish standardised and efficient administration of the security agreements.</p>
<p>Introduced the term "security audits" and clarified how security audits should be conducted.</p> <p>Replaces the term "security verifications".</p>	<p>Security audits shall be conducted under the direction of Offshore Qualific AS.</p>
<p>Chapter 7, Requirements for parties entering into security agreements.</p>	<p>The content of the new 091 Offshore Norge Recommended Guidelines is presented in a more comprehensive way in order to achieve a better and more efficient cooperation between the parties.</p> <p>One change is, for example, that suppliers with a security agreement may package cargo received from suppliers without a security agreement.</p>
<p>More extensive requirements for the offshore facilities.</p>	<p>Clarified routines.</p>
<p>More extensive requirements for return cargo.</p>	<p>Clarified routines for return cargo before the cargo is transported back offshore.</p>
<p>New Chapter for "Competence and learning".</p> <p>This change does not involve new requirements for expertise or training.</p> <p>NOTE:</p> <p>An update of the 091 Offshore Norge e-learning course is planned and will be carried out once these 091 Offshore Norge Recommended Guidelines are approved.</p>	<p>Clarify requirements for competence and documented training for personnel in operating companies, at suppliers with a security agreement and supply bases with a security agreement.</p> <p>This has also been clarified in relation to the content of security conversations.</p>

<p>Expanded the chapter on responding to incidents and coordinated with the updated PISAS procedure.</p>	<p>Described PISAS and how this system is used to respond to incidents.</p> <p>Clarified what shall be done in the event of different types of incorrect actions related to Offshore Norge security seals.</p>
<p>New chapter for experience transfer and lessons learned following security incidents.</p>	<p>Encouraged a better process for lessons learned across the supply chain.</p>
<p>Updated Appendix 1</p> <p>This appendix is not public information.</p>	<p>Clarified security measures associated with the different security levels.</p>
<p>New Appendix 2</p> <p>This appendix describes specific measures for suppliers with a security agreement for baseline security and security levels A, B, C, and D.</p> <p>This appendix is not public information.</p>	<p>Suppliers with a security agreement shall have specific measures for baseline security and additional measures for security levels A, B, C and D.</p> <p>The intention is for all suppliers with a security agreement to be included in Group II in PISAS.</p>
<p>Revised Appendix 3</p> <p>The security agreement shall describe which operating sites/addresses are covered by the agreement.</p> <p>The security agreement shall describe whether receiving, inspection, packing and Offshore Norge sealing of cargo from other suppliers shall be carried out at the different operating sites.</p>	<p>It is important to have an overview of the operating sites/addresses in order to plan security audits.</p> <p>This includes having an overview of suppliers and supply bases that receive, inspect, package and Offshore Norge seal cargo from others, so that all parts of the enterprise are covered by the security risk analysis and security plan.</p>

APPENDICES

Appendices may be obtained upon inquiry to Offshore Qualific AS.

Appendix 1 – Security level and security measures for helicopter terminals and supply bases

Appendix 2 – Security level and security measures for suppliers with a security agreement

Appendix 3 — Security agreement for suppliers and supply bases