



Deep Water – Gulf of America (UPD-GOA)

UPD-GOA OPERATIONS FATIGUE RISK MANAGEMENT PLAN (FRMP)

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INTERNAL

Revision	Date	Summary of Changes	Reviewer	Reviewer	Author
0.0	Jan. 2025	■ Issue of Plan			Keith Richard
0.1	March 2025	■ Made clarifications for better readability and SEAM alignment	Eileen Hoff		Keith Richard
0.2	July 2025	■ Changed Notification and Approval from OM to OIM	Eileen Hoff	Corey Boice	Keith Richard

SUMMARY

Fatigue Risk Management is a plan developed to manage the risk of fatigue affecting the safety of all personnel that work on an offshore facility, members of the Incident Management team and personnel which have direct reports working on offshore facilities.

Key Words

Fatigue, FRMP, Fatigue Management

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1 GLOSSARY

- **Callout** – summoning personnel to worksite to perform work when they are not scheduled.
- **Exception (process)** – the process of agreeing to accept the additional risk associated with personnel working beyond their established hours of work and the potential impact on their level of fatigue.
- **Extended shift** – work period greater than 14 hours regardless of the scheduled shift length.
- **Fatigue** – defined as a state of drowsiness or sleepiness caused by a lack of sleep.
- **Fatigue Risk Management Plan (FRMP)** – the documented approach to fatigue risk management for an organization.
- **Fatigue Risk Management System** – defined as the FRMP and supporting materials including training, risk assessment tools and ongoing education and communications material. Organization developed materials and corporate materials are included.
- **Handover** – a brief period of 5-30 minutes at the end of every shift set aside for the transfer of information and understanding of the events and system during the shift.
- **Holdover** – to require personnel to remain at their work location for work or other activities past the end of their shift but no more than two (2) hours.
- **Shell Performance Framework** – collections of documents that define Shell’s systematic approach to management designed to ensure compliance with the law and to achieve continuous performance improvement.
- **Overtime** – time worked beyond the end of the scheduled shift and works set.
- **Personnel** – an employee or contractor.
- **Shift** – four or more consecutive hours worked, regardless of the nature of the work.
- **Work set** – work that takes place between minimum required rest periods.

2 PURPOSE

This **Fatigue Risk Management Plan (FRMP)** covers Upstream Production Deepwater GoA Operations. (See other groups for their FRMPs.) It is concerned with managing the risk of fatigue affecting the safety of all personnel that work on offshore and related facilities. The plan does not attempt to directly manage the risk of fatigue affecting hazardous activities, production, human efficiency or health, though these may arise as a consequence of managing risks to safety.

3 OBJECTIVE

The objectives of this Fatigue Risk Management Plan (FRMP) are to ensure:

- Managers, Supervisors, and those in HSSE Critical Positions within UPD GoA Operations are aware of the circumstances that may create fatigue risk.
- UPD GoA Operations has in place controls for managing the risk of fatigue to as low as reasonably practicable (ALARP).
- That the effectiveness of those ALARP controls is regularly reviewed and subjected to continual improvement.
- That incident investigations conducted in UPD GoA Operations identify situations where fatigue may have been a contributing factor to significant and high potential incidents, and that learning from such

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incidents is fed back to improve controls both at the UPD GoA Operations and within the Shell group, if applicable.

- That personnel who are accountable and responsible for implementing elements of this plan have the competence and resources needed to do so effectively.

4 APPLICATION

The FRMP covers Shell staff as well as contractors working on an offshore facility (inclusive), members of the Incident Management team and personnel which have direct reports working on offshore facilities. In addition to those personnel, those listed in the HSE Cases as HSSE Critical Positions as Front-Line Barrier Managers (FLBM) must satisfy the requirements of the Shell Performance Framework Manual (SEAM) requirements regarding Fatigue Management and this FRMP. Per the SEAM standard this includes minimum personnel whose:

- agreed work schedule, including Call-Out on-call periods, is between 00:00 and 06:00 hours for 3 consecutive calendar days or more; or
- agreed work schedule results in 3 consecutive calendar days or more with periods of wakefulness of 17 hours or more in a 24-hour period.
- roles are identified as HSSE Critical Positions.

This includes at minimum the following roles:

ACR	Marine Supervisor	OSE
BCO	Mechanic	PEI
CRO	Medic	Production Specialist
Electrician	OIM	Compliance Lead
Electrical Technician	OM	Warehouse
General Planner	OMC	WPT
Logistics	Operations Supervisor	
Maintenance Supervisor	Operator	

5 ROLES AND RESPONSIBILITIES

5.1 PERSONNEL WORKING ON AN OFFSHORE FACILITY, MEMBERS OF THE INCIDENT MANAGEMENT TEAM AND PERSONNEL WHICH HAVE DIRECT REPORTS WORKING ON OFFSHORE FACILITIES.

Responsible for:

- Becoming aware of fatigue and risks to safety.
- Notifying their supervisor of any situation where personnel are/may be at risk of injury or impact to environment, reputation, or assets due to fatigue; when there is a breach in policy; or when they have a concern about their own level of fatigue.
- Adhering to the applicable rules and regulations in place at their worksite.
- Following the Fatigue Self-Reporting Protocols during their shift if they are unable to obtain adequate sleep before reporting to work, or if there is reason to believe their alertness has become impaired to such an extent that they are unable to continue to work safely without additional controls.
- Informing Shell Health or their own medical provider if it is believed there is a medical condition that interferes with their ability to gain adequate sleep.

5.2 IMMEDIATE SUPERVISORS OF PERSONNEL

Responsible for:

- Recognizing signs of fatigue in personnel.
- Dealing with personnel who utilize the Fatigue Self-Reporting Protocols to indicate insufficient sleep or elevated levels of fatigue.
- Considering the potential risks of fatigue when scheduling or approving personnel for overtime work, whether from a full-shift or extending the hours worked on an existing shift or callout.
- Ensuring personnel who work overtime or respond to callouts will have sufficient time for recovery sleep before returning for their next duty.
- Ensuring personnel in applicable HSSE Critical Positions are aware of the risks of Fatigue associated with lack of time off for sleep and have completed the required training.

5.3 COMPLIANCE LEADS / S&E COACHES/ADVISORS

Will be Site Fatigue Coordinators for the assets.

Responsibilities include:

- Supporting implementation of the FRMP.
- Supporting site personnel with the required training.
- Sharing learnings and identifying recommended improvements to the FRMP Implementation Procedure.

5.4 THE UPD GOA OPERATIONS FATIGUE COORDINATOR (OPERATIONS, MAINTENANCE, PROJECTS, & ASSURANCE LEAD)

Responsibilities include:

- Managing implementation of the FRMP.
- Monitoring compliance with all controls defined in the FRMP.
- Collecting and reporting on KPIs (as necessary).
- Supporting Site Fatigue Coordinators.
- Maintaining communication and awareness of risks of fatigue in the workplace at the site with Site Fatigue Coordinators at least twice per year.
- Participating in the periodical review & update of the FRMP to ensure accuracy and completeness.

6 HOURS OF SERVICE AND EXCEPTIONS

All employees shall report to work rested to prevent fatigue during their planned work schedule for that day.

- Work shall be planned such that no one is scheduled to work for more than 12 continuous hours, including breaks and mealtimes.
- Work rotations shall be assigned as 7 calendar days on shift followed by 7 calendar days off shift, 14 calendar days on shift followed by 14 calendar days off shift or 14 calendar days on shift followed by 7 calendar days off shift.
- When unforeseen circumstances require personnel to work beyond the daily hours of service limit, the requirements below must be met:
 - Supervisors of these personnel may allow up to a 2-hour extension, after a risk assessment and ensuring controls are in place to recognize and manage fatigue.

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- Personnel must immediately notify their supervisor if they anticipate their work will exceed the 2-hour extension.
- Extensions beyond 14 hours are limited to 2 consecutive days.
- The Line manager and Offshore Installation Manager's approval is required if the "2-hour extension" or "2 consecutive days" limits are exceeded.
- Assigned work rotations shall be followed. Extensions shall be minimized and must meet the following requirements:
 - Personnel's supervisor must ensure that a risk assessment is completed, and controls are in place to recognize and manage fatigue.
 - Personnel may not work more than 28 consecutive days unless approved by the Line Manager and Offshore Installation Manager
 - Extensions of time offshore shall be provided in alignment with the following table. After completing the required rest, personnel may extend their time offshore for up to 10 calendar days. At the end of the extended time offshore personnel must have the standard number of days off associated with their schedule rotation.
 - Rest can be achieved at the facility or other offshore location if no work is performed. Work includes physical labor, call outs and consultation.

Table 1: Rest required for extended days offshore

Day shift only work	Night shift only or mixed shift work
minimum 36 consecutive hours of rest with two night-time periods for sleep offshore	minimum 60 consecutive hours of rest with three night-time periods for sleep offshore
OR	OR
24 hours onshore for rest with a total time off for rest of 36 hours	24 hrs. onshore for rest with a total time off for rest of 46 hours

7 TRAINING

All personnel covered by this FRMP must complete Workday Fatigue Risk Awareness training by reviewing "Fatigue Management Self and Co-Workers." or "Principles of Fatigue Risk Management." Training shall be refreshed every three years.

Supervisors shall ensure personnel covered by this FRMP are aware of these training requirements, as well as proactively inform all personnel with the risks associated with lack of time off for sleep.

In addition to the training, an on-going program of awareness and communication shall be delivered. This program shall include face-to-face workshops, safety moments, toolbox meetings, posters, and other awareness-raising materials. Examples of these materials are available on the Shell Health Fatigue Website.

8 WORK PLANNING

Prior to the start of a job or project, consideration shall be given to the appropriate level of staffing required to comply with the requirements of FRM. This consideration should include planning of workforce and workload balance to enable personnel to perform their work and maintain the required balance of working time and time off.

- For those in positions where the FRMP applies; ensure FRM is considered and documented:
- If it's a permitted job or project, ensure it includes consideration of FRM.
- If a permit is not required, ensure a JSA is created to include the consideration of FRM.

9 SELF-REPORTING

UPD GoA Operations personnel shall always be aware of their level of fatigue and take appropriate steps to enhance their alertness while on duty. If personnel feel that they are too fatigued to work safely, they shall report this to their supervisor. The supervisor shall address this report of fatigue and manage this risk with appropriate mitigations.

10 FATIGUE RISK MANAGEMENT FOR CONTRACTORS

Contracted staff covered in the plan as stated above must meet all requirements of this plan.

11 INCIDENT / NEAR MISS INVESTIGATION

The investigation of significant and high potential incidents will be conducted in a manner that facilitates the determination of the role, if any, of fatigue as a root cause or contributing cause to the incident. Questions to support understanding fatigue are found on the Shell Health Fatigue SharePoint page. The incident investigation focal point, in consultation with the UPD GoA Operations Fatigue Coordinator, should collect and provide trends to present, as needed, for the annual continuous improvement review.

12 PERIODIC REVIEW OF THE FRMP TO ACHIEVE CONTINUOUS IMPROVEMENTS

The annual Shell Performance Framework Manual (SEAM) review shall include a review of the FRMP to achieve continuous improvements. The review's main objective will be to ensure functional processes, systems and work practices are aligned with the FRMP and assurance mechanisms are fully utilized.

In addition, the following metrics will be discussed in aggregate, to assess effectiveness and opportunities for continuous improvement:

- SOU Training Completion Rates
- Number of incidents with fatigue as a root or contributing cause.