

# BDA Audit Update – June 2025: Pre-Operational Inspections, Manual Handling & Borehole Monitoring

### Updates to the BDA Audit – June 2025

The BDA Audit Steering Group (ASG) has been reviewing feedback and discussing ways to further enhance and streamline the audit process. One of the key areas of development has been addressing requests to make the audit more driller focused. While the introduction of the quality conformance section has improved this aspect, there is also a clear call from members to place more emphasis on the Lead Driller's role in safety. In response, the ASG has agreed to implement several changes to the audit over the coming months.

#### **Pre-Operational Inspections of Machinery and Equipment**

A major change will involve a stronger emphasis on pre-operational inspections (pre-use checks) of machinery and equipment. Companies should already be conducting these checks in accordance with the manufacturer's instructions and the Provision and Use of Work Equipment Regulations (PUWER). Regulation 6 of PUWER states that:

"Every employer shall ensure that work equipment exposed to conditions causing deterioration which is liable to result in dangerous situations is inspected—

(a) at suitable intervals; and

(b) each time that exceptional circumstances which are liable to jeopardise the safety of the work equipment have occurred,"

Given the abrasive, unforgiving and unpredictable nature of land drilling, it is reasonable to assume that the drilling plant and equipment is susceptible to damage and deterioration which may jeopardise safety. Consequently, it is established good practice that the equipment is inspected by the operative before starting work every day and that this check is documented.

Going forward, these documented pre-operational inspections will serve as evidence of a driller's competence with regards to health and safety compliance during the audit.

Documentation of these inspections must be readily available for the auditor on the day of the audit. The auditor will use the completed inspection documentation as the basis for determining a driller's compliance and competence with regards to health and safety aspects of their drilling machine and equipment. The new approach will put the responsibility for ensuring the equipment is safe to use on the Lead Driller, rather than relying purely on certification and paperwork usually handled by their employer.

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The auditor will perform spot-checks on up to three randomly selected pieces of machinery or equipment (these could be winches, ropes or lifting accessories), and the Lead Driller will be asked to demonstrate how they have verified that the equipment is safe to use, providing evidence of their understanding. This may include a review of equipment against certification and the corresponding pre-use checks.

If non-conformities (such as rope damage or missing guarding) are found that were missed or not documented during the pre-use checks, the responsibility will rest with the Lead Driller, not the company. If the non-conformance is in an area deemed to be critical to the safe operation of the machinery, this will result in a major safety-critical non-conformance, with no opportunity for correction and a 'failure' recorded as the audit outcome.

Further guidance on what the BDA would expect to see covered as part of a pre-operational inspection will be available shortly, along with a list of safety-critical aspects of the equipment that, if found to be damaged, missing or defective, and that have not been identified by the auditee in their pre-start checks, would lead to an audit being terminated. The aspiration is to facilitate cultural change within the land drilling industry, to develop the understanding of Lead Driller and Drilling Support Operatives, with the plant operators being positively encouraged to record and report non-compliant or defective machinery and equipment as soon as possible.

#### **Manual Handling Training**

A new minor non-conformance has been introduced to the audit. Company's will now be required to provide proof that Lead Drillers and Drilling Support Operatives have undergone manual handling training. This requirement has been identified by the Health and Safety Committee as a legal obligation. Failure to provide proof of this training will result in a minor non-conformance. While this change takes effect immediately, it will become a prerequisite for all audits on 1<sup>st</sup> September 2025, meaning drilling operatives will not be eligible for audit without manual handling training having been undertaken. Members are reminded that manual handling training should be task-specific.

### **Quality and Technical Standards**

Over the past 12 months, since the addition of quality standards to the audit, the data has shown that while minor non-conformances are identified, they rarely exceed one or two per audit. These have typically been related to issues such as the absence of records to prove SPT rod straightness checks, or poor record-keeping on daily reports or sample labelling. The process has supported Lead Driller and Drilling Support Operative understanding of the expectations and allowed us to asse the current non-conformance threshold

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No audits have been 'failed' due to the accumulation of five or more minor non-conformities, and therefore the Technical and Standards Committee has decided to raise the bar by reducing the allowable minor non-conformities from five to three before an audit is recorded as non-conforming. This gradual tightening aims to further increase compliance across all technical areas.

### **Major Non-Conformities in Borehole Monitoring**

Additionally, two issues will now be classified as major non-conformities due to their critical role in borehole monitoring:

- The absence of equipment to accurately measure the borehole (e.g. missing dip tape).
- The lack of a functioning dip meter to measure water levels.

The committee considers these tools to be fundamental to any investigation, and no exceptions will be allowed. These technical changes will come into effect immediately.

These updates reflect the ongoing efforts to improve safety, technical standards, and quality compliance within the drilling industry, ensuring audits remain fair, relevant, and focused on industry needs.

