

To comply with British Drilling Association (BDA) standards, all members using drilling machines and their accessories must adhere to the maintenance, inspection and recording requirements set out in the Provision and Use of Work Equipment Regulations (PUWER). This guidance outlines the industry's position on the application of PUWER and the Lifting Operations and Lifting Equipment Regulations (LOLER).

While PUWER fully applies to drilling machines, some aspects of LOLER are also relevant. However, LOLER is not typically the primary regulation for monitoring compliance in routine drilling operations, unless the equipment is *used* in a lifting capacity beyond accessory handling. Drilling machines are designed primarily for drilling, not for lifting and applying LOLER in full adds little value to safety. In fact, involving personnel unfamiliar with drilling operations, such as a slinger/signaller, may increase the risk of incidents.

LOLER applies primarily to equipment designed for lifting, such as cranes. Although drilling machines and cranes may share components like steel wire ropes and winches, this similarity does not make LOLER the appropriate regulation. The intended function of the equipment determines the applicable regulation and for drilling machines, this is PUWER.

The BDA has actively supported safety improvements in the industry, including introducing LOLER where appropriate and reinforcing the application of PUWER. These efforts have enhanced safety standards across the drilling sector. However, misconceptions about LOLER's application persist. The HSE, while remaining the regulatory body, relies on industry groups like the BDA to provide sector-specific guidance and promote good practices.

### **Why PUWER Is the Primary Regulation for Drilling Machines**

PUWER establishes legal standards for drilling machine compliance. It addresses the risks associated with moving parts, falling objects and other hazards inherent to drilling operations. Key provisions, such as Regulations 11 and 13 require guarding against unintended contact and managing other hazards to ensure operator safety.

Drilling machines are not designed for lifting loads and applying the full LOLER framework to drilling machines is not appropriate, unless they are used to lift loads in a way that meets LOLER's criteria for lifting operations. Their primary function is to drill boreholes, either through rotation resonance or percussion. However, the BDA recognises that certain aspects of LOLER can enhance safety.

### **Why Some Aspects of LOLER Are Adopted**

Due to similarities in failure modes between lifting and drilling machines (e.g. wire rope and accessory failures), the BDA requires members to adopt Regulation 9 of LOLER. This mandates thorough examination by a competent, impartial person and regular inspection of components, this provides a higher standard of safety than PUWER alone.

This approach ensures that drilling machines are inspected rigorously, with annual thorough examinations documented by certificates. However, the BDA does not endorse applying LOLER in full to standard drilling activities. An example where LOLER would fully apply would be the lifting machines into position by a crane, but not for routine drilling operations. The competent person must be independent of the equipment operator, with sufficient technical knowledge and experience to detect potential defects and assess risk.

### **The Importance of Following Industry Practices**

While adherence to good practice is not mandated by law, a failure to follow established industry good practice and guidance may be difficult to defend should an incident occur. By requiring members to adopt PUWER and uphold the requirements for thorough examinations under LOLER, the British Drilling Association (BDA) aims to enhance safety while demonstrating a strong commitment to high industry standards.

## **Frequently Asked Questions**

### **Q: Do I need a lift plan for everyday drilling operations?**

A: No, there is no requirement to create a lift plan for drilling operations, as these are not considered lifting activities. The primary task of forming a borehole is classified as a drilling activity, not a lifting operation, therefore there is no need for an appointed person, lift supervisor and/or slinger signaller for drilling operations, however the appropriate Risk Assessment and Safe System of Work must be in place.

### **Q: Do we need to have a Report of Thorough Examination as defined in LOLER?**

A: Yes, the British Drilling Association (BDA) requires all members to have a certificate of thorough examination, not exceeding 12 months. This practice has been adopted as good practice for many years by the BDA to enhance safety within the industry. However, this has led to confusion among those outside the drilling industry, who may assume that LOLER applies to every element of the machine and operation. The inspection regime could be more frequent depending on the environment; for example, offshore conditions may increase the risk of equipment failure due to corrosion.

### **Q: Do accessories such as swivel hooks and shackles require an examination?**

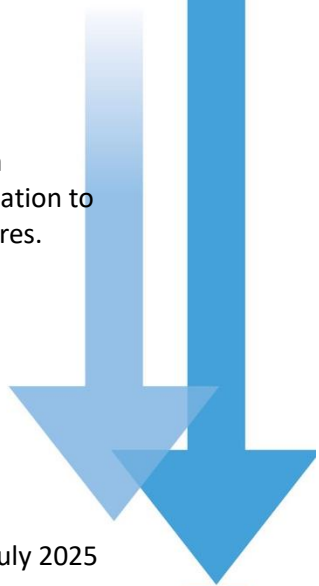
A: Yes, accessories can fail. As such the BDA requires that all members adopt a minimum regime of inspections at a period not exceeding 6 months. This can be more frequent dependent on the environment (e.g. if offshore, corrosion can increase the risk of accessory failure). Lifting accessories associated with drilling machines include SPT hammer sleeves, rod swivels, shackles and wireline system overshots.

### **Q: Do wire ropes require a thorough examination every 6 months or 12 months?**

A: When purchased individually, the wire rope is classed as an accessory and will have a Thorough Examination with a 6-month expiry. Once fitted to a drill rig and examined as part of the rig's thorough examination, the wire rope may fall under the same 12-month inspection cycle. However, increased wear or environmental factors may justify more frequent checks.

### **Q: Is a wire rope failure reportable as a Dangerous Occurrence under RIDDOR?**

A: As a drilling machines primary purpose is not for lifting, a wire rope failure is not classified as a dangerous occurrence under RIDDOR (Schedule 2, Part 1). However, it is essential for the organisation to investigate the failure to understand its cause and implement any necessary preventative measures.



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The BDA is committed to Improving Standards in Health & Safety, Quality of Workmanship and Technical Proficiency for the Drilling Industry and its Clients.

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