



Guidelines for stakeholders management regarding third party interference

Table of content

1	Background	3
2	Definitions	3
3	Key stakeholders	3
3.1	Authorities responsible for land use planning	4
3.2	Licensing and supervising authorities	4
3.3	Permit holders	4
3.4	Emergency services	4
3.5	Landowners and land users	4
3.6	Contractors and other parties, working in the vicinity of gas pipelines	5
3.7	Neighboring (infrastructure) operators	5
3.8	Pipeline operator	5
4	General guidelines regarding communication with stakeholders	5
5	Guidelines for communication with specific stakeholders	5
5.1	Authorities responsible for land-use planning	6
5.2	Licensing and supervising authorities	6
5.3	Permit holders	7
5.4	Emergency services	7
5.5	Landowners and land users	7
5.6	Contractor or Excavator	8
5.7	Neighboring infrastructure operators	8
5.8	Pipeline operator	8
6	Conclusion	9

1 Background

According to the EGIG database, external interference is still the primary threat to the integrity of gas pipelines.

Incidents caused by external interference are characterized by potentially severe consequences that can impact public safety. Furthermore, such incidents will lead to negative publicity, criticism of shareholders, higher attention by local authorities on safety for future activities, public protest campaigns delaying operation start of new pipelines and higher technical demands and costs on pipeline construction.

The MARCOGAZ document "General practices for managing external interference on underground pipelines" (WG_TP-121) gives a high-level overview of relevant issues in relation to external interference. One of the important issues is to establish good communication with the key stakeholders to ensure that they are aware of all potential pipeline risks. This guideline provides high-level general requirements for stakeholder management in order to involve them in "third party" damage prevention.

2 Definitions

Term	Meaning
Pipeline operator	Private or public organization authorized to design, construct and/or operate and maintain the gas infrastructure
Pipeline	Any planned or existing gas transmission pipeline
Authorities	Responsible for the health, safety, welfare of the residents, for establishing requirements and regulations and for issuing licenses and permits. The authorities are the primary source of approvals
Permit holder for "soil penetrating" activities	The person or entity that is allowed to do the activities or take the actions stated in the permit
Permit holder for pipeline route	Usually the pipeline operator
Landowner	Any person, utility, municipality, authority, or other person or entity who have pipelines on, in or near their property
Contractor or Excavator	Individual or other entity including a homeowner that will dig, bore, trench, grade, excavate or break ground with mechanical equipment in the vicinity of a pipeline.

3 Key stakeholders

Transmission pipeline operators are responsible for the safe operation and maintenance of natural gas transmission pipelines. Operator responsibilities include taking actions to avoid pipeline damage or failure.

Such actions consist of amongst others: continued maintenance of transmission pipeline facilities, adequate involvement of relevant stakeholders, development of emergency plans, surveillance of the pipeline route and the development and implementation of damage prevention and awareness programs.

In general, the pipeline operator is not in direct control of the area in which the pipeline is situated, but is dependent on cooperation of several other stakeholders.

Key stakeholders in this respect are:

1. Authorities responsible for land use planning

2. Licensing and supervising authorities
3. Permit holders
4. Emergency services
5. Land owners and land users
6. Contractors and other parties, working in the vicinity of gas pipelines
7. Neighboring infrastructure operators
8. Pipeline operator

3.1 Authorities responsible for land use planning

When performing land use planning, these authorities have to take the existing infrastructure and surroundings in consideration for properly fitting a new pipeline in the land use plans. The pipeline shall be plotted in such a way that its environment is acceptably safe. The land use planning shall guarantee that the pipeline route and required distances around it remain respected during its operational life.

3.2 Licensing and supervising authorities

The authorities have the responsibility and obligation to enforce regulations and permit conditions and ensure compliance with them. Several kinds of authorities issuing permits can be identified and might be relevant:

- issuing permits to construct and operate the pipeline in a public area;
- issuing permits to cross other infrastructure like railway's, motorway's and waterway's
- issuing permits to work in the vicinity of infrastructure, preferably to be issued by its operator
- issuing other work-related permits like allowance to cut trees, water extraction and disposal.

It is their responsibility to issue permits (to contractors, spatial developers) that are comprising conditions that ensure the safety of the pipelines which are present in or near the area where ground works are being performed.

The authorities shall supervise the adherence of permit terms and conditions.

3.3 Permit holders

Permit holders have the responsibility to ensure that all requirements as ordained by the authorities in the licenses and/or permits are properly addressed. Obtaining all necessary permits is required prior any activities in the vicinity of the gas pipeline.

3.4 Emergency services

Emergency services shall be informed in advance of the presence of a gas pipeline in order to adapt public emergency procedures. They can also advise on the possible impact on the emergency procedures of neighboring infrastructure.

3.5 Landowners and land users

When not in a public area, the pipeline is situated in privately owned land. Landowners and land users have interests in relevant obligations and the impact of the gas pipeline in using the land. In some countries, it is arranged in the cadastre. If not, it should be assured in an appropriate way.

3.6 Contractors and other parties, working in the vicinity of gas pipelines

Parties working in the vicinity of gas pipelines are responsible for preventing damage to the pipelines and other underground facilities. These parties can be either the operators own constructing organisation, parties working on behalf of the operator or a third party.

3.7 Neighboring (infrastructure) operators

Third party infrastructure operators have similar responsibilities as the pipeline operator and are responsible to construct and operate their infrastructure in such a way that there is minimum interference with existing pipelines. This is not restricted to infrastructure operators, but also applies to facilities like industrial sites and mining activities in the vicinity of pipelines.

3.8 Pipeline operator

The pipeline operator is responsible for the safe and reliable operation and maintenance of the transmission system. The pipeline operator normally holds permits for pipeline location in public area and right of way agreements if located in private land.

4 General guidelines regarding communication with stakeholders

Stakeholders should be informed about the pipeline location and the risks relating to gas transmission pipelines. Effective risk communication is very important to raise the level of understanding about these risks. The way this information is communicated may affect future pipeline projects, the development of areas near the pipeline, excavation work near pipelines and public acceptance of pipelines.

The main goal of the stakeholder management is to prevent pipeline damage by any activity and to create trust and understanding. This is of great importance for expansion projects too.

Appropriate, accurate and clear information should be provided to the stakeholders in order to ensure that they are aware of the presence of the pipeline and that all necessary damage prevention and safety issues have been considered. All relevant critical aspects shall be explained to the stakeholders. These critical aspects may include but not are limited to:

- one call / one click information, see Guidelines for safe working in the vicinity of high-pressure gas pipelines (WG_TP-144);
- general requirements in relation to the continuous safe operation of the pipeline;
- a description of the predefined safety distance and permissible/non-permissible activities within the safety distance;
- information on what activities can potentially damage the pipeline;
- excavation requirements;
- regulatory requirements;
- information regarding emergency response and emergency contacts.

5 Guidelines for communication with specific stakeholders

Since there is no one fits all communication for all stakeholders, neither regarding to content nor to style, this chapter gives some guidelines for specific stakeholders.

5.1 Authorities responsible for land-use planning

The authorities responsible for land-use planning should be informed about upcoming new pipeline projects or pipeline modification projects as early as possible so that they can take the pipeline into account of the land-use plans. The pipeline operator should provide the authorities with the intended location of the pipeline and the pipeline and operating parameters as well as the risks, conditions and restrictions that apply for the land-use in the vicinity of the pipeline.

During the operational life phase of the pipeline, it is recommended that the pipeline operator maintains regular contact with the authorities responsible for land use planning to ensure that the pipeline position, as well as the related obligations, remains well known. This should prevent permits to be issued that would lead to building unwanted structures or infrastructure too close to the pipeline.

5.2 Licensing and supervising authorities

Different types of permits and other kind of licenses are issued by a large variety of authorities and other qualified organizations. The relation towards the permit holder varies as well, as does the communication.

Some specific elements are:

- Organizations issuing permits to construct and operate the pipeline in a public area;
The pipeline operator shall inform the issuing organization about new pipeline routes to be permitted and it is strongly recommended to establish an adequate communication framework with the aim to prevent permission of structures that might cause a threat to the permitted pipeline during its operational life;
- Organizations issuing permits to cross other infrastructure like railway's, motorway's and waterway's;
Some neighboring network operations might be qualified to issue permits or allowances to cross or come close to their networks. It is likely that some interference will occur, both in just situating there and in executing works. To avoid confusion and overstrained demand, communication shall be in accordance to the level of interaction that can be expected;
- Organizations issuing permits to work in the vicinity of infrastructure, preferably to be issued by its operator
Once is determined that underground infrastructure is present at a site on which soil penetration activities are scheduled, the executing contractor shall formalize auditable consent with the network operator about exact locations and working procedures, by which the underground pipeline will maintained safe. Supervision of the pipeline operator towards the activity shall be mandatory in any case the operator finds that necessary;
- Organizations issuing other work-related permits like allowances to cut trees, water extraction and disposal.
These permits are issued by public authorities and the permit holder can be the pipeline operator or the soil penetrating contractor. The permits shall be requested in due time because there might be some serious handling time before achievement. Information provided with the request shall be accurate to prevent confusion afterwards.

In order to obtain licenses for constructing, modifying or operating a pipeline, the licensing authorities must be provided with all the required information about the project, the construction and the operating conditions. In addition, the authorities should be kept informed via phone, mail, or email on regular basis when required or desirable. The pipeline operator must also provide information about emergency response procedures and the one-call system in order to ensure the safety of natural gas pipelines during construction and operation. When required by

the authority, the pipeline operator must report periodically about safety issues regarding the pipeline.

The supervising authority may perform compliance audits.

5.3 Permit holders

The requests for permits or licences shall be accompanied with adequate information to conform the procedure of permitting. Permit holders must communicate contents and restrictions defined in the permit and explain the roles and the responsibilities to all parties involved in the excavation activity. Permit holders in this respect can be either pipeline operator or any party working in the vicinity of the pipeline.

5.4 Emergency services

Emergency services shall be informed of the (planned) presence of gas installations. During the permitting process or even before, information can be transmitted to the emergency services. Considering the risks associated to gas installations, the fire brigades are the most relevant emergency service.

Communication shall not be limited to the permitting process but shall continue on a regular basis during the lifetime of the installation.

Information relevant to emergency services:

- Inventory of hazardous products, hazard characteristics (flammable,) and operational conditions (pressure, temperature)
- Incident scenarios, effect distances and recommended evacuation distances
- Possible intervention strategies.
- Incident management: crisis organization, contact information, communication channels
- Arrangements on emergency exercises

5.5 Landowners and land users

In case of any planned construction or maintenance activities on the pipeline, a meeting with landowners and land users involved should be planned in order to acquire access to the pipeline, review plans, agree on financial compensation of the temporary use of the land, answer questions and obtain feedback. The goal of such meetings is to establish and maintain open communications and a trustful long-term relation with the landowner and land user. Information regarding plans and procedures to protect the land before and during construction and restore the land after construction should be provided and clarified. A site visit could be part of the meeting. The site visit will provide an opportunity for the pipeline operator to explain construction procedures in the field and describe how the project will be constructed.

The pipeline operator should draw an agreement or contract with the landowner and the land user in which all relevant issues regarding the temporary use of the land and financial compensation are addressed. For new to build pipelines, a "right of way" agreement shall be established.

All potential issues and/or environmental concerns shall be discussed with the landowner. All relevant information should be provided directly to affected landowners:

- contact information for landowner issues;
- financial compensation for the temporary use of the land during construction, for any damage during and after construction and for permanent restrictions of the use of the land if applicable;

- brochure with project schedule including construction and restoration activities, including environmental issues;
- regular updates on project

During the operational life phase of the pipeline, it is recommended that the pipeline operator maintains regular contact with the land owner and land user to ensure that the pipeline position, as well as the related obligations, remains well known.

5.6 Contractor or Excavator

The contractor or in fact every "soil penetrating" party shall prior to the actual work use the "one-call" system to receive relevant information about underground infrastructure located at the construction site. In case of involvement of an underground structure operator, the contractor shall contact that operator to assure proper guidance. Prevention of damage to the underground infrastructures must be a top priority. The contractor shall take notice of and respect the demands for safe working in the vicinity of high-pressure gas pipelines and shall be informed how to act in case of incidents. General guidelines for that are specified in MARCOGAZ document [WG_TP-144].

5.7 Neighboring infrastructure operators

Third party pipeline and cable operators have the same responsibility as the pipeline operator. Furthermore, they should be aware that any activity regarding their infrastructure may affect the nearby pipeline. Any work on the pipelines or cables in the vicinity of other pipelines or cables should be discussed with the respective infrastructure operators. They should consult with the pipeline operator to minimize interference between both infrastructures or facilities and the activities related to that. They should also exchange relevant information on emergency planning.

In case of industrial plants of mining area's in the close vicinity of pipelines, these pipelines shall be incorporated in the company emergency plans of the neighboring operator.

5.8 Pipeline operator

The pipeline operator is responsible for communicating all the relevant issues regarding the operation or modification of the pipeline, the restrictions that apply to activities near the pipeline, the compliance with regulations and the safety for the environment with the respective stakeholders. It must provide accurate information about the location of the pipeline and the conditions and restrictions that are applicable when excavating near the pipeline. It shall provide an adequate response on an excavating notification via the one-call system and must also provide supervision during the excavation when that contributes to the prevention of damage to the pipeline.

Pipeline operators should communicate with licensing authorities as early as possible. During the introductory meetings the pipeline operator shall outline the project, establish relationships with the authorities, identify potential issues early in the process and discuss possible and practical solution to the issues. Early involvement with the authorities can improve the overall efficiency of the many processes and help to keep projects and activities on schedule. During the project the pipeline operator keeps informing the authorities on progress and ensures that the authorities are informed about relevant issues as they arise. That can be done via phone, mail, or email.

The pipeline operator should arrange contractors meet other stakeholders, for example landowners to make a good first impression and discuss all potential issues in order to deliver a confident and clear message.

6 Conclusion

Transmission pipeline operators are responsible for the safe operation and maintenance of natural gas transmission pipelines. However, they need the cooperation of several stakeholders to manage that properly.

An effective communication framework should be established with the key stakeholders to ensure that they are aware of the pipeline, the development around it and the specific role that the stakeholder performs in that matter.

The development and the successful implementation of stakeholder management will help to achieve better communication and understanding with stakeholders. It is a vital instrument to maintain the highest levels of pipeline safety and integrity.

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