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# Changes and Updates to API RP1162

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# What is API RP1162?



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## Stakeholder Communications

An industry consensus standard that provides guidance and recommendations to pipeline operators for the development and implementation of enhanced public awareness programs regarding pipeline safety.

## Stakeholder Groups:

Public Officials

Emergency Officials

Excavators

Affected Public

# Various Editions



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The 1<sup>st</sup> Edition of the API RP1162 was published in 2003 to provide guidelines for operations in the development, implementation and evaluation of Public Awareness Programs.

The 2<sup>nd</sup> Edition was developed in 2007, the implementation of the public awareness programs under federal regulations that incorporated API RP1162. Changes were made based on the experiences of stakeholders, including key operators from all pipeline segments, and lessons learned during the initial four-year period.

Key changes included a focus on core safety information and overall reduction in the number of messages, which was well supported by research into overall message retention.

# Key Takeaways – Previous Edition



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In 2011, Federal and State pipeline regulators began conducting targeted inspections – PHMSA Form 21- on the operators’ public awareness programs for effectiveness – based on the 1<sup>st</sup> Edition.

## **Some key takeaways:**

- Public awareness program objective: inadequate focus on communication of risks, hazards and potential impacts.
- Stakeholder audiences: missed stakeholder audiences, unclear stakeholder identification processes/verification needed improvement, lack of clarity of coverage areas and information needs.
- Written public awareness programs: duplicative messages, information overload, delivery frequencies, unique attributes and process for identifying non-English speaking populations.
- Maintaining liaison with emergency: unclear on what liaison means, generic and/or inconsistent information shared.
- Program implementation: inadequate documentation of program changes, baseline and supplemental messages and activities, what was required and what was not,
- Program evaluation: misalignment with program objectives, annual audit- use of regulatory inspection, difficulty measuring behavioral changes and understandability, unclear on acceptable public awareness program effectiveness, inconsistent effectiveness approaches and unclear methodologies and/or metrics identifying program changes.

# PAPWG formed

In 2013, PHMSA formed an industry-wide Public Awareness Program Working Group (PAPWG)

## **Objective:**

- Foster Public Awareness Continuous Improvements

## **How:**

- Reviewed pipeline public awareness data and information from various sources
- Performed a SWOT (Strengths, Weaknesses, Opportunities and Threats) analysis
- Issued an analysis report of key finding on May 16, 2016.

# 3<sup>rd</sup> Edition – General Summary

Task Group used RP1162 – 1<sup>st</sup> and 2<sup>nd</sup> Editions as well as RP1173

– Adopted: August 2022

– Timing: Earliest 2023 more to come.....

- Inclusion of RP1173 introduced and four-step approach:
  - **PDCA – Plan, Do, Check, Act**
- Incorporates the terms: “can”, “may” and “should” – no “shall” statements
- Only applies to active transmission, local distribution and gather pipeline systems in the United States (versus “normal operation of existing” systems)
- Following terms were added:

Analysis	Assessment	Behavioral Intent
Census Sampling	Confident Level	Immediately Dangerous to Life and Health (IDLH)

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# Cont'd 3<sup>rd</sup> Edition – General Summary

Liaison	Margin of Error	Qualitative Research
Quantitative Research	Resident	Samples

- Removal of the requirement to obtain management support or commitment for an operator's public awareness program
- Removal of the overall requirement to "Implement Continuous Improvement"-replacement with the requirement to establish written program objectives and criteria for determining when program changes are warranted.

# Cont'd 3<sup>rd</sup> Edition – General Summary



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- Languages – developing audience contact lists, including a stakeholder identification process to determine geographic coverage when communicating with affected public
- Revised audience definitions and examples for added clarity –no changes to the Stakeholder audiences
- Maximum distance has been added to provide clarity on how far an operator can be expected to communicate effectively
- Key changes to Section 5 Table:
  - Baseline message for stakeholder audiences and all operator types: “Commodity type(s) Transported and Potential Hazards”
  - Supplemental message: “Operator’s Pipeline Safety Compliance Record”
  - Supplemental message: “Pipeline Purpose and Reliability”
  - Removed as a message topic: Information and/or overview of operator’s Integrity Management Program

# Cont'd 3<sup>rd</sup> Edition – General Summary



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- Baseline message for excavators and emergency officials, supplemental for affected public and public officials – “Sharing Pipeline Safety Information”
- Supplemental message – all stakeholder audiences – “ROW/Easement/Land Use”
- Baseline message – Public Officials and Supplemental – Emergency Officials – “Damage Prevention Importance” and “Damage Prevention Steps”
- Baseline message – All stakeholders – “Threats and Suspected Damage”
- Baseline message – All stakeholders – “Priority to Protect Life”
- Baseline message – Emergency Officials and Supplemental – Public Officials – Emergency drills and exercises
- Baseline message – All stakeholders – “Leak Recognition and Response”
- Baseline message – Affected Public, Emergency Officials and Public Officials – added as a topic – “Special Emergency Response” – IDLH

# Cont'd 3<sup>rd</sup> Edition – General Summary

## Delivery and Frequencies and Methods

Affected Public – Every two years, not to exceed 27 months

Affected Public (non-customer) – Each calendar year, not to exceed 15 months

Affected Public (LDC customers) – Twice annually – not to exceed 7.5 months

Emergency Officials – Each calendar year, not to exceed 15 months

Public Officials – Every two years, not to exceed 27 months

Excavators – Each calendar year, not to exceed 15 months

## Program Implementation and Supplements

**Program Implementation:** Removed activities that are included in Program Establishment – including: conducting base line program activities in operator's written public awareness program; identifying, planning and conducting supplemental activities, if warranted; identifying necessary resources for program activities (e.g., internal and external resources or consultants); documenting program activities.

# Cont'd 3<sup>rd</sup> Edition – General Summary

## Program Supplements:

- “Potential Hazards” and “Pipeline History in an Area” have been removed
- Section 7.2.1 – Communicate certain operational changes - Communication should occur prior to the change but not later than 180 days after the change occurs.
- These operations changes are:
- Initial operation – newly commissioned pipeline which is greater than 10 miles in length – introduces a new release hazard (e.g. installing a second pipeline within the ROW transporting a different commodity type, which introduces new hazards not previously communicated
- Initial operation of distribution pipeline outside existing geographic coverage area
- Conversion to service (e.g., liquids to gas, gas to liquids)
- Change in operator’s emergency contact information (e.g., change to 24-hour emergency number)
- There are samples when a communications is not expected

## Public Awareness Program Evaluation

- Provides more detailed guidance, examples and templates for required evaluation activities
- Provides standardized core survey questions to collect data for each stakeholder group
- Regulatory audits are excluded as an allowable method for conducting an annual review
- Develop a process to evaluate the accuracy of stakeholder contact lists
- Clarifies that required documentation of the program evaluations to make a determination regarding effectiveness and shift focus from continuous program improvement to identification of program changes
- Develop a process or method to evaluate the accuracy of stakeholder contact lists –may be performed by the operator or third-party
- The term “effective measure” changed to “effectiveness evaluation metrics” – changes metrics outlined in a table form.
- Program effectiveness evaluation section – use baseline questions provided, as well as supplemental survey questions, provided

# Cont'd 3<sup>rd</sup> Edition – General Summary

## Documentation

- Public Awareness program documentation should include the written program elements listed in Section 4.2
- Document records that should be retained include:
  - Baseline communication materials for each stakeholder audience
  - Lists, records other documentation with whom operator has communicated
  - Implementations dates
  - Postage receipts
  - Program effectiveness evaluation and annual implementation reviews
  - Stakeholder audience language analysis
  - Supplements to the baseline program
- Record retention period change to a minimum of seven years, or as defined in the operator's public awareness program, whichever is longer.



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QUESTIONS????