

11 March 2024

The Birmingham and Solihull Coroner's Court,  
Steakhouse Lane,  
Birmingham,  
B4 6BJ.

For the attention of: Mr James Bennett (H.M. Area Coroner)

Dear Coroner,

We acknowledge receipt of your Regulation 28 report which was received by the British Drilling Association (BDA), on January 16, 2024.

The BDA offers its condolences to all those affected by these events.

The purpose and aims of the BDA are to improve health and safety and raise technical and training standards in the ground drilling industry. All work undertaken by BDA in preparing guidance notes, safety alerts and best practise documents is completed by its members on a voluntary basis. The Association is essentially administered through committees which determine the strategic direction and complete and undertake the work of the organisation.

For clarity, the BDA currently does not have any members who undertake horizontal directional drilling which uses the equipment and pipework which appears to be the subject of particular concern. The Association therefore lacks the expertise and experience needed to comment or provide specific guidance to members on either the events around Mr Harper's tragic death or the Coroner's concerns as set out in Section 5 of his report.

The BDA has however been working with Balfour Beatty Vinci Joint Venture and the Pipeline Industries Guild, to understand what action they have taken following the incident and to offer support to the proposed industry safety standard improvements.

Whilst not in a position to provide specific guidance to members on the matters concerning the Coroner, the BDA will notify its members of this incident and share any safety alerts it receives via our Newsletter and on our website, to highlight the findings of the investigations and make them aware of the published information. Furthermore, the BDA will remind its members of the need to follow documented Safe Systems of Work (RAMS) in accordance with the Management of Health and Safety at Work Regulations 1999 and CDM Regulations 2015, and obligation to adhere to manufacturer instructions when utilising any work equipment in accordance with the Provision and Use of Work Equipment Regulations 1998.

The above actions will be completed and distributed via our Newsletter and website by April 2024.

Thank you for writing to the BDA. We trust that our response is considered appropriate and satisfactory, however should you have any further comments, questions or queries, please do not hesitate to contact us. We understand you will forward a copy of our letter to the Chief Coroner who may publish it in a complete, redacted or summary form, and confirm we would appreciate notification of such an intent.

Yours sincerely

For and on behalf of the British Drilling Association



Chairman