



**NSPE Comments to the Chemical Safety Board  
December 15, 2010**

Chairman Moure-Eraso,

The National Society of Professional Engineers is grateful for the opportunity to comment before the Chemical Safety Board today. NSPE supports safe, environmentally sound offshore oil-drilling.

NSPE commends the federal government for enacting additional safety measures since the BP Deepwater Horizon offshore rig explosion earlier this year. Offshore oil-drilling, however, is an inherently risky activity; and as the BP spill demonstrated, an accident exposes the public and environment to potential catastrophe. The combined high-risk nature of offshore drilling and accompanying possibility for disaster necessitate an additional degree of protection for the public health and safety.

NSPE believes that licensed professional engineers should have direct supervision over all engineering design, operations, and maintenance of offshore oil rigs. Professional engineers are licensed by the government, which requires them to meet and maintain an acceptable standard of competence. Professional engineers are also bound by a code of ethics to make decisions only in their areas of expertise. Most critically, professional engineers are ethically obligated to protect public health and safety above all other concerns.

Safety can be compromised when employees feel compelled to put loyalty to their employer before ethics. Professional engineers are unique in two ways: First, professional engineers are accountable to the state that licensed them, ensuring that a professional engineer's loyalty is to the public, not an employer. Like doctors and attorneys, professional engineers depend on their license to practice; and losing that license would ruin a professional engineer's reputation and end his or her career. Continued licensure carries more weight than continued employment at one company.

Second, when professional engineers make decisions, they are taking full, *personal* responsibility for those decisions. Professional engineers sign and seal plans as individuals, and they take singular responsibility for the soundness of those plans. This sense of personal responsibility renders professional engineers impervious to outside pressure and motivates them to maintain the highest safety standards.

Because of their proven competence and commitment to public health and safety, NSPE recommends that offshore oil rigs employ professional engineers to supervise all engineering design, operations, and maintenance decisions. This will help improve the safety of offshore oil-drilling and minimize the potential for disaster.

Thank you.