Department for
Business, Energy
& Industrial Strategy

Guidance Notes for Preparing Oil Pollution Emergency Plans

For Offshore Oil and Gas Installations and Relevant Oil Handling Facilities

June 2022

Any enquiries regarding this publication should be sent to us at:
enquiries@beis.gov.uk or bst@beis.gov.uk

Revision	Date	Comment
0	January 2015	First Issue
1	May 2015	Amended to reflect Industry comments
2	August 2015	Amended version issued following implementation of amendments to the OPRC Regulations
3	December 2016	Amended to address queries arising throughout 2015 and 2016
4	October 2017	Amended to reflect introduction of the Competent Authority Portal OPEP submission/update process
5	March 2019	Amended to address queries arising throughout 2017, 2018 and 2019
6	September 2021	Amended to address queries arising throughout 2020 and 2021. Includes new OPEP ‘variation’ process and amended worst case instantaneous release scenarios to be included in modelling.
7	June 2022	Amendment to Appendix F – Dispersants Use and Approval. Removes redundant telephone number and corrects email address in section F.9.

Contents

1. Introduction 7
2. Legislative Background 7
   2.1 The OPRC Convention 7
   2.2 The Offshore Safety Directive 7
   2.3 The Amended OPRC Regulations 8
   2.4 The Offshore Installations (Emergency Pollution Control) Regulations 2002 8
   2.5 OPEP Approval 9
   2.6 Inspection, Regulatory Compliance and Enforcement 9
   2.7 Offences 9
3. When is an OPEP Required? 10
   3.1 How to Determine if an OPEP is Required 10
   3.2 Additional Guidance for Operators of Oil Handling Facilities that are Pipelines (Pipeline Operators) 11
4. Administrative Process 11
   4.1 OPEP Submissions 11
   4.2 Responsibility for OPEP Submission 12
   4.3 Regulatory Review Period 13
      Temporary Operations OPEP (TOOPEP) – Drilling Operations/Workover/Intervention 13
      Communication and Interface Plans 13
      OPEP Submissions in relation to new Safety Cases 13
      OPEP Submissions in relation to Material Change(s) to a Safety Case 13
   4.4 Consultees 13
   4.5 The Department Assessment Process 14
      Clarification Requests 14
      Non-Approval Issues 14
   4.6 OPEP Approval and Controlled Copies 14
   4.7 Variations to OPEPs 15
   4.8 Five Year Review 16

4.9 Withdrawal of OPEPs and Communication and Interface Plans 16
4.10 Financial Responsibility 16
Appendix A – Structure and Content of OPEPs 18
A.1 OPEP Types 18
Onshore OPEP 18
Production Installation/Field OPEP 19
Consolidated OPEP 19
Non Production Installation (NPI) OPEP 19
Temporary Operations OPEP (TOOPEP) 19
Communications and Interface Plan 20
Pipelines 20
Suspended and Abandoned Wells 21
Installations not in Offshore Waters 21
Decommissioning 21
Operations from Vessels 22
A.2 OPEP Type Requirements 24
A.3 OPEP Content Requirements 25
A.4 OPEP Assessment Templates 26
A.5 Guidance on Requirements for Consolidated OPEPs 28
A.6 Guidance on Requirements for Non Production Installation (NPI) OPEPs 40
A.7 Guidance on Requirements for Communication and Interface Plans 42
Appendix B – Modelling Guidance 45
B.1 Modelling Requirements 45
B.2 Model Input 46
B.3 Model Output Requirements 47
Appendix C – Training and Exercises 53
C.1 Training 53
C.2 Exercises 54
C.3 Retention of Records 60
Appendix D – Oil Spill Reporting Arrangements 61
Appendix E – Oil Spill Sampling Requirements 63
E.1 Oil Sampling Capability 63
E.2 When to Obtain Oil Samples from the Sea Surface 63

E.3 Number of Samples to be Obtained 63
Appendix F – Dispersants Use and Approval 64
F.1 Regulatory Regime 64
F.2 Decision Making Process 64
F.3 Request for Advice 64
F.4 Standing Approval 65
F.6 Dispersant Use to Protect Life or the Installation 66
F.7 Record Keeping 67
F.8 Dispersant Stocks 67
F.9 Contacting the Department 67
Appendix G – Shoreline Response Planning 71
Appendix H – OCU Requirements 73
H.1 OCU Interface Arrangements 73
H.2 Roles and Responsibilities of Identified Positions 73
H.3 OCU Room Requirements 74
Appendix I – Aerial Surveillance Requirements 75
Appendix J – Definitions and Abbreviations 77
J.1 Definitions 77
J.2 Abbreviations 80

1. Introduction

This document provides guidance to Installation Operators, Well Operators and Owners of Non Production Installations for all offshore oil and gas operations conducted in the territorial sea adjacent to the UK or any area designated under section 1(7) of the Continental Shelf Act 1964.

For the purposes of this Guidance and as per The Merchant Shipping (Oil Pollution Preparedness, Response and Co-operation Convention) Regulations 1998 (as amended) (OPRC Regulations), Installation Operators, Well Operators and Owners of Non Production Installations are referred to as 'Responsible Persons'. Operators of pipelines and relevant Oil Handling Facilities are defined as 'Operators of Oil Handling Facilities'.

An OPEP is a legally required emergency response document which will facilitate the implementation of a robust and effective response to an oil pollution incident and minimise the impact on the marine environment. Persons who submit an OPEP are reminded that OPEPs may be made publicly available.

This Guidance supersedes all previous OPEP Guidance issued by the Department for Business, Energy and Industrial Strategy (the Department).

2. Legislative Background

2.1 The OPRC Convention

The International Convention on Oil Pollution Preparedness, Response and Cooperation (OPRC Convention) as adopted by the International Maritime Organisation (IMO) in 1990 entered into force in the United Kingdom (UK) on 16 December 1997 and was implemented for offshore oil and gas operations by the OPRC Regulations.

2.2 The Offshore Safety Directive

On 28 June 2013 EU Directive 2013/30/EU on the safety of offshore oil and gas operations (The Offshore Safety Directive - OSD) was published. The OSD requires that certain information regarding emergency response measures is included in the Internal Emergency Response Plan (IERP) which forms part of the Report on Major Hazards (Safety Case). In the UK the IERP is delivered jointly by the OPEP and the emergency response plan required by PFEER.

In order to implement those elements of the IERP relating to oil pollution response the OPRC Regulations were amended on 19 July 2015. The amended regulations introduce the concept of the Responsible Person and require that the Responsible Person or Operator of the Oil

Handling Facility must have an OPEP in accordance with the requirements of the amended OPRC Regulations which must be prepared in accordance with this Guidance.

2.3 The Amended OPRC Regulations

The OPRC Regulations apply to all UK waters and in any area designated under the Continental Shelf Act 1964 and state that every Responsible Person and operator of relevant Oil Handling Facilities must ensure that all offshore oil and gas operations for which they are responsible are subject to an OPEP approved by the Secretary of State for Business, Energy and Industrial Strategy. The Department requires that OPEPs are in place for all operations in relation to offshore installations, connected infrastructure, Oil Handling Facilities or wells which present a risk of an oil pollution incident.

For the purposes of the OPRC Regulations and this Guidance all pipelines that are not connected infrastructure or any facility that would be an Offshore Installation were it located in Offshore Waters are considered to be Oil Handling Facilities.

The 2015 amendments to the OPRC Regulations introduce different provisions for those Offshore Installations (including connected infrastructure) located in Offshore Waters as opposed to pipelines and Oil Handling Facilities. The content of OPEPs required for pipelines and Oil Handling Facilities are unchanged by the 2015 amendments to the OPRC Regulations.

2.4 The Offshore Installations (Emergency Pollution Control) Regulations 2002

The Offshore Installations (Emergency Pollution Control) Regulations 2002 (the EPC Regulations) are made under section 3 of the Pollution Prevention and Control Act 1999 to provide the Secretary of State with intervention powers to prevent and reduce pollution and the risk of pollution following an accident involving an offshore installation.

The Secretary of State's Representative (SOSREP) is authorised to exercise the intervention powers specified in the EPC Regulations. The powers conferred to the SOSREP are exercisable in the event that an accident involving an offshore oil and gas installation has occurred and, in the opinion of the Secretary of State, the accident will, or may cause significant pollution.

To allow for the potential involvement of the SOSREP all OPEP's must reflect the requirements specified in relevant sections of this Guidance and be consistent with the National Contingency Plan (NCP).

2.5 OPEP Approval

The Department is the regulatory authority, on behalf of the Secretary of State, for determining the suitability of OPEPs for all offshore oil and gas operations (including pipelines) in UK waters and in any area designated under the Continental Shelf Act. The OPEP review, assessment and approval process is conducted by the Department's Offshore Environmental Inspectorate within the framework of the Offshore Major Accident Regulator (OMAR).

OPEPs which relate to certain operations (e.g. exploration well operations, appraisal well operations, deep water well operations, HPHT well operations) require sign off by the Department's senior management.

2.6 Inspection, Regulatory Compliance and Enforcement

During Offshore Environmental Inspections OPEP arrangements may be inspected by the Department. Any inspection may include, but is not limited to:

- Review of relevant offshore personnel's understanding of the OPEP;
- Confirming that the training of relevant personnel meets requirements of the amended OPRC Regulations and this Guidance;
- Examination of the equipment available for use in the event of an oil release; and
- Review of the exercises undertaken to test the arrangements in the OPEP.

The Department will also request returns on an annual basis from Responsible Persons and Operators of Oil Handling Facilities to confirm the status of training certification and the exercises that were undertaken to test the OPEP.

2.7 Offences

Regulation 7 of the amended OPRC Regulations details the offences in relation to OPEPs.

Regulation 7(1)

Any Operator of an Oil Handling Facility or any Responsible Person who, without reasonable cause:

a) Fails to submit or re-submit and OPEP in accordance with regulation 4(3), (4) or (5);

b) Does not maintain an OPEP as approved (with altercations directed by the Secretary of State, as the case may be, if so directed) under regulation 4(5) to (7); or

c) Fails to implement its OPEP in contravention of regulation 4(8),

shall be guilty of an offence punishable on summary conviction by a fine not exceeding the statutory maximum or on conviction on indictment by a fine.

Regulation 7(2)

Any Person required to make a report under regulation 5 or 6, as the case may be who, without reasonable cause, fails to comply with that requirement in all respects shall be guilty of an offence punishable on summary conviction by a fine not exceeding the statutory maximum or on conviction on indictment by a fine.

Regulation 7(3)

Any Responsible Person who without reasonable cause:

a) Fails to comply with a duty under regulation 4(9); or

b) Breaches the obligation in relation 4(10),

is guilty of an offence punishable on summary conviction by a fine not exceeding £5,000, or on conviction on indictment by a fine.

Regulation 7(4)

Any Operator of an Oil Handling Facility who, without reasonable cause, breaches the obligation in regulation 4 (11) is guilty of an offence punishable on summary conviction by a fine not exceeding £5,000, or on conviction on indictment by a fine.

3. When is an OPEP Required?

3.1 How to Determine if an OPEP is Required

Responsible Persons and Operators of Oil Handling Facilities must review the OPRC Regulations and this Guidance when determining if an OPEP is required.

Responsible Persons and Operators of Oil Handling Facilities must determine whether the proposed/ongoing oil and gas operations present a risk of an oil pollution incident.

All operations carried out on or in relation to offshore installations (including connected infrastructure) or Oil Handling Facilities which present a risk of an oil pollution incident must be detailed within the scope of an OPEP approved by the Secretary of State for Business, Energy and Industrial Strategy.

Where the Responsible Person or Operator of an Oil Handling Facility considers there is no risk of an oil pollution incident there is no requirement for an OPEP. In such circumstances the Department may require details of this determination.

Additional guidance for oil and gas operations conducted from vessels is provided in section A.1 of this Guidance.

3.2 Additional Guidance for Operators of Oil Handling Facilities that are Pipelines (Pipeline Operators)

All UKCS pipelines (including interconnectors and any pipeline operated by those companies who are solely responsible for pipelines and not any other offshore oil and gas infrastructure) with the potential for an oil pollution incident must have an approved OPEP. If a Pipeline Operator states that a pipeline contains 100% dry gas with no possibility of an oil pollution incident there is no requirement for an OPEP. In such circumstances the Operator of the dry gas pipeline must provide a justification document to the Department which is to include:

- Details and/or schematic of the pipeline system;
- Operatorship responsibility limits; and
- A demonstration that there is no potential for an oil pollution incident from the pipeline.

If the nature of the pipeline inventory changes such that an oil pollution incident becomes possible, the Department must be notified and an OPEP must be submitted without delay.

4. Administrative Process

4.1 OPEP Submissions

All OPEP submissions must be made through the Competent Authority Portal (CA Portal) which is accessed via the UK Oil Portal.

The CA Portal is an online system that must be utilised by all Responsible Persons and Operators of Oil Handling Facilities to submit OPEPs. The Department will review and manage all OPEP submissions through the CA Portal. All notifications, Non-Approval Issues (NAIs) and Approvals will be issued to the Responsible Person or Operator of the Oil Handling Facility through the CA Portal.

To facilitate the assessment process Responsible Persons or Operators of Oil Handling Facilities should also upload a completed Assessment Template to the CA Portal with each OPEP submission, which identifies the location of the required information within the OPEP.

Assessment templates can be obtained from the OSDR website:
http://www.hse.gov.uk/osdr/guidance/oil-pollution.htm

If the installation(s) to be included in the scope of the OPEP submission, or if the name of the Responsible Person or Operator of the Oil Handling Facility is not available in the CA Portal data, please contact UK Oil Portal (UKOP) (ukop@ogauthority.co.uk) or the Support Line on

0300 067 1682. UKOP will check with the Department prior to updating the CA Portal data base.

4.2 Responsibility for OPEP Submission

Table 1 below details who has the responsibility to submit each specific OPEP type.

Table 1

OPEP Type	Responsibility for OPEP Submission
Onshore	Well Operator, Installation Operator or Pipeline Operator.
Production Installation/Field ('Offshore')	Installation Operator (where the Well Operator of a subsea tie-back is different to the host installation Operator, the Well Operator may apply for a field offshore OPEP specifically that tie-back).
Consolidated OPEP	Where the Installation Operator and the Well Operator are the same a consolidated OPEP may be submitted to cover the tier 1, 2 and 3 responses. Where the installation Operator and the Well Operator are different, a consolidated OPEP may be written in collaboration. In such cases the OPEP must be submitted by the Installation Operator and final approval would be issued to both the Installation and Well Operator.
Temporary Operations OPEP (TOOPEP)	Well Operator.
Consolidated TOOPEP	Tier 1, 2 and 3 responses may be consolidated into one Temporary Operations OPEP. In such cases the Consolidated Temporary Operations OPEP must be submitted by the Well Operator
Non Production Installation (NPI)	NPI Operator
Communication and Interface Plan (CIP)	Installation Operator (or Well Operator where operations are undertaken within a tied-back field which holds a separate Offshore OPEP).
Pipeline OPEP	Pipeline Operator.

4.3 Regulatory Review Period

Subject to the sections below the Responsible Person or Operator of the Oil Handling Facility is required to submit the OPEP a minimum of two months before;

- The proposed start-date of operation(s); or
- Any proposed changes to take effect.

Temporary Operations OPEP (TOOPEP) – Drilling Operations/Workover/Intervention

The Regulatory review period for a TOOPEP is 21 days where the NPI holds an approved NPI OPEP and intends to undertake oil and gas operations where an approved Onshore OPEP is in place. In any other circumstances the regulatory review period for a TOOPEP is two months.

Communication and Interface Plans

The Department requires that CIPs are submitted a minimum of 21 days prior to the commencement of the proposed operations with the CIP being assessed as a variation to the Production Installation/Field OPEP.

OPEP Submissions in relation to new Safety Cases

When any OPEP is submitted to accompany a new Safety Case the OPEP should ideally be submitted at the same time as the Safety Case. However the regulatory review period for such OPEP submissions is two months prior to commencement of operations.

OPEP Submissions in relation to Material Change(s) to a Safety Case

When any OPEP is being re-submitted due to a Safety Case Material Change the OPEP submission should ideally be made in conjunction with the Safety Case submission. If the Material Change to the Safety Case does not affect the OPEP there is no requirement to re-submit the OPEP.

4.4 Consultees

The Department may consult with a range of organisations/Government Departments during the OPEP approval process. The Department will identify the appropriate consultee(s) and forward the OPEP for comment via the CA Portal. Any consultee comments received will be assessed by the Department and will be included within any clarifications or Non-Approval Issues (NAIs).

4.5 The Department Assessment Process

The Department will assess the OPEP against the relevant Assessment Template. Where there is a need for clarification on aspects of the OPEP the Department will liaise with the Responsible Person or Operator of the Oil Handling Facility to determine the appropriate mechanism to resolve/clarify these areas. Where NAIs are identified these will be sent to the Responsible Person or Operator of the Oil Handling Facility via the CA Portal for action.

Clarification Requests

During the assessment process the Department may identify the need for the Responsible Person or Operator of the Oil Handling Facility to clarify certain aspects of the OPEP.

Communications regarding any matters to be clarified will occur outside of the CA Portal during the Department's assessment of the submission. Should the Department identify that amendments are required to OPEP the Department may either request that they be made during the assessment process and the amended OPEP resubmitted, or the Department may approve the OPEP with the expectation that the amendments will be made to Controlled Copies.

Non-Approval Issues

If the Department determines that any OPEP submission fails to demonstrate compliance with the OPRC Regulations and this Guidance the reasons for non-compliance will be raised as NAIs. All NAIs will be communicated to the Responsible Person or Operator of the Oil Handling Facility via the CA Portal. The OPEP will not be approved until such time as all NAIs have been addressed.

All responses to NAIs must be provided to the Department via the CA Portal. Any changes made to the OPEP in response to the NAIs must be highlighted within any amended OPEP submission that accompanies the NAI response via the CA Portal.

4.6 OPEP Approval and Controlled Copies

Once an OPEP has been deemed to meet the requirements of the OPRC Regulations and this Guidance, an Approval Letter will be issued by the Department via the CA Portal. The approved OPEP must be available for use by all response personnel prior to operations commencing or a variation taking effect. A minimum of one hard copy of all relevant OPEPs must be available on each offshore installation. All onshore response centres must hold hard copies of all relevant OPEPs.

The Responsible Person or Operator of the Oil Handling Facility must upload the controlled copy of the final approved OPEP to the CA Portal. This should be completed prior to operations commencing or a variation taking effect.

OPEP Approval Letters issued by the Department should not be included in the final controlled copies of approved OPEPs.

All organisations that were previously supplied with an electronic version of final approved OPEPs will now access controlled copy OPEPs via the CA Portal.

Where there is a change in operatorship/ownership the new Responsible Person or Operator of the Oil Handling Facility must submit an OPEP for approval via the CA Portal at least two months prior to the transfer taking place. The Department will not issue an updated OPEP Approval Letter until the appropriate legal transfer has completed.

4.7 Variations to OPEPs

There may be a requirement for a Responsible Person or Operator of the Oil Handling Facility to vary an approved OPEP or a Communications and Interface Plan. It should be noted that the initial submission of a CIP is considered to be a variation to the production installation/field or consolidated OPEP it interfaces with.

The Department no longer differentiates between major and minor changes and the following process applies to all changes to OPEPs, CIPs and to all initial submission of a complete CIP.

All variations to an existing OPEP or CIP are managed through the CA Portal. To make any variation the Responsible Person or Operator of the Oil Handing Facility must locate the relevant OPEP/CIP in the CA Portal and follow the functionality of the ‘Work on this OPEP’ section.

All variations must be uploaded to the CA Portal in the form of updated OPEP page(s) or updated CIP page(s) or the complete CIP if an initial submission (see Section A.1 for more information on CIPs).

Responsible Persons and Operators of Oil Handling Facilities must upload either a copy of the amended pages highlighting all proposed variations or a CIP to the CA Portal a minimum of 21 days before the variation is due to come into effect.

A completed Assessment Template should also be uploaded to the CA Portal with all CIPs.

The Department will assess the proposed variation to determine compliance with the requirements of the OPRC Regulations and this Guidance.

Should the Department determine that the proposed variation cannot be approved the Responsible Person or Operator of the Oil Handling Facility will be directed to undertake appropriate action to comply with the OPRC Regulations and the Guidance. Approval Letters will be issued via the CA Portal by the Department for all variations to OPEPs or CIPs and all complete CIPs that are deemed to meet the requirements of the OPRC Regulations and this Guidance.

Material Changes to a Safety Case or certain documents required to be submitted to the Competent Authority under The Offshore Installations (Offshore Safety Directive) (Safety Case etc.) Regulations 2015 (SCR 2015) and PFEER.

Any material change to a Safety Case or any documents prepared and submitted to the Competent Authority by virtue of regulation 15(1), 15(3), 19(1), 21(1) or 22(1) of SCR2015 or regulation 8(1) of PFEER only requires the OPEP to be amended if the material change impacts on the oil spill response arrangements as detailed in the OPEP. If any OPEP requires amendment as the result of such a material change Responsible Persons or Operators of Oil Handling Facilities must submit the amended OPEP via the CA Portal as per the above requirements.

4.8 Five Year Review

Every Responsible Person or Operator of the Oil Handling Facility must carry out a full review of each OPEP within five years of the date upon which the OPEP was first approved and a minimum of every five years thereafter.

The five year review may be brought forward to coincide with a variation to the OPEP. In such circumstances the Responsible Persons or Operators of Oil Handling Facilities must undertake a full review of their OPEP utilising the ‘Work on this OPEP’ section of the CA Portal.

All five year reviews must be submitted to the Department via the CA Portal at least two months before the end of the five year review period.

4.9 Withdrawal of OPEPs and Communication and Interface Plans

Responsible Persons or Operators of Oil Handling Facilities must notify the Department and all controlled copy holders when:

- The oil and gas operations that were in the scope of an approved OPEP or CIP have been concluded; and
- That the OPEP or CIP is to be withdrawn.

Only after these discussions with the Department may the Responsible Persons or Operators of Oil Handling Facilities withdraw the OPEP via the CA Portal using the functionality of the ‘Work on this OPEP’ section.

4.10 Financial Responsibility

The Financial Responsibility assessment is not part of the OPEP review process, with the information provided being assessed under the provisions of the Offshore Petroleum Licensing

(Offshore Safety Directive) Regulations 2015. Installation and/or Well Operators must provide brief details of the licensed operator(s) holding OPOL membership (or other comparable arrangements) for the offshore oil & gas operations covered by the relevant OPEP. See Section A.5 (24) Oil Spill Response for further information.

If you have queries on an aspect of an OPEP submission you should contact the Department at the following email address bst@beis.gov.uk

Appendix A – Structure and Content of OPEPs

An OPEP is an operational document that must be implemented in the event of an oil pollution incident and must be prepared in a manner which enables all users, including external stakeholders, to promptly gather the key information required to identify and implement the most effective response strategy.

This Appendix details all information which the Department requires to be contained in an OPEP. Assessment Templates used by the Department when reviewing OPEP submissions are available on the OSDR website at:

http://www.hse.gov.uk/osdr/guidance/oil-pollution.htm

Responsible Persons or Operator of Oil Handling Facilities should provide a completed Assessment Template with each OPEP submission referencing where all information required by this Guidance can be found in the OPEP. Responsible Persons or Operators of Oil Handling Facilities are encouraged to utilise the Assessment Template to quality check the OPEP prior to submission.

Guidance on the use and completion of Assessment Templates is contained in Sections A.3 and A.4 of this appendix.

A.1 OPEP Types

There are a number of approaches Responsible Persons or Operators of Oil Handling Facilities can adopt when preparing an OPEP. It is for the Responsible Person or Operator of the Oil Handling Facility to determine how to structure their oil spill response documentation in a manner which ensures full compliance with The OPRC Regulations and this Guidance.

Onshore OPEP

Responsible Persons or Operators of Oil Handling Facilities may prepare an ‘onshore’ OPEP which will detail Tier 2/3 response arrangements applicable to the installation(s) for which they have responsibility. Such ‘onshore’ OPEPs will be supplemented by an ‘offshore’ OPEP which details the Tier 1 response arrangements plus any production installation/field specific Tier 2/3 information not included in the onshore document (such as relief well arrangements detailed in Section A.5). It is recognised that under certain circumstances the Tier 1 and Tier 2/3 response documents may be the responsibility of different organisations e.g. Tier 1 by the Installation Operator, Tier 2/3 by the Well Operator.

Production Installation/Field OPEP

These OPEPs will detail the production installation(s)/field Tier 1 response arrangements and any other pertinent information required by the On-Scene Commander to implement an effective response to an oil pollution incident.

It is acceptable for a Production Installation/field OPEP to contain response arrangements for more than one installation provided the required information, as defined in this Guidance, is included for each installation and there is effective delineation within the OPEP between installations to allow for ease of reference between the relevant sections.

Where the Well Operator of a subsea tie-back is different to the host Installation Operator, the Well Operator of the tie back may hold a separate offshore Field OPEP (Tier 1) specifically for that tie-back. This OPEP must be held on the host installation.

Consolidated OPEP

Responsible Persons or Operators of Oil Handling Facilities may combine the requirements of an Onshore OPEP and a Production Installation/Field OPEP into a single OPEP which includes the Tier 1, 2 and 3 response arrangements. Such an approach would necessitate the OPEP to outline both offshore and onshore roles and responsibilities. In such cases the Department requires separation in the OPEP of the actions to be taken offshore and onshore to provide clear delineation of the information required to facilitate an effective response to an oil pollution incident.

Non Production Installation (NPI) OPEP

All NPIs must hold an approved NPI OPEP which must interface with the OPEP arrangements of the Well or Installation Operator when the NPI is undertaking offshore oil and gas operations.

Any vessel that holds an accepted Safety Case compliant with the requirements of SCR2015 and undertakes offshore oil and gas operations is considered to be an NPI.

The NPI OPEP details aspects of the Tier 1 response arrangements that are specific to that NPI. The intention is that the NPI OPEP will not change from operation to operation, and will only require amendment in the event that the specific arrangements on that NPI have changed. As NPI OPEPs are not site specific, the information contained within will be limited and this will be supplemented by information provided in the Production Installation/Field OPEP, the TOOPEP and the CIP as appropriate. This is represented in Table A.1 below. These OPEP arrangements will demonstrate that appropriate internal emergency response arrangements are in place.

Temporary Operations OPEP (TOOPEP)

This is required in conjunction with an NPI OPEP where the NPI is undertaking non-combined operations (and certain combined operations - see CIP requirements below) which are not detailed within an existing Production Installation/Field OPEP. It must include all information

required within a Production Installation/Field OPEP with the exception of that which has already been provided with the NPI OPEP and any relevant onshore OPEP. Roles and responsibilities, reporting requirements and the interface arrangements between different OPEP types must be clearly detailed within the TOOPEP.

Communications and Interface Plan

Any NPI holding an accepted Safety Case compliant with SCR2015 undertaking Combined Operations must be included in the OPEP arrangements. In such circumstances a CIP may be submitted to the Department in accordance with this Guidance.

The CIP will act as a link between the OPEP of the NPI undertaking combined operations, the Production Installation/Field OPEP and any relevant Tier 2/3 response plan. It must detail any operation specific requirements such as roles, responsibilities, reporting requirements and response options prior to the commencement of any combined operations. This document will be considered to be a variation to the Production Installation/Field OPEP which must be approved by the Department.

During combined operations that are well operations and where the well operator holds a production installation / field OPEP a CIP updating that OPEP can be submitted. Where the well operator does not hold a relevant Production Installation / Field OPEP and the responsibility for Tier 1 response will rest with that well operator a TOOPEP must be submitted.

Where a NPI intends to undertake non-combined operations in a location within the scope of an existing Production Installation/Field OPEP it is for the Responsible Person(s) to determine if a CIP or a TOOPEP is used to provide the OPEP arrangements required by the OPRC Regulations and this Guidance.

It is acceptable for the Responsible Person to submit an existing Bridging Document which meets the requirements of the CIP. This should be clearly referenced in the relevant section of the Assessment Template.

Pipelines

All pipelines which contain oil must be included within the scope of an approved OPEP. Pipelines which are connected infrastructure are considered part of an installation and should be included in the relevant Production Installation/Field OPEP or have OPEP arrangements in place which contain the relevant Tier 1/2/3 response arrangements. If a pipeline is not connected infrastructure it is considered to be an Oil Handling Facility and in this case a specific Oil Handling Facility OPEP must be prepared which contains the information detailed within the Consolidated OPEP Assessment Template, subject to the OPEP contents requirements in Table A.2. The Oil Handling Facility OPEP should detail specific roles and responsibilities and contain information applicable to that pipeline.

The OPRC Regulations allow for joint OPEPs in respect of Oil Handling Facilities and associated installations/connected infrastructure. For example a pipeline from an installation to

an onshore terminal would be defined as an Oil Handling Facility from the point beyond the installation 500 m zone to the terminal. The Responsible Person or Operator of the Oil Handling Facility can include this pipeline within the scope of either a Production Installation/Field OPEP or a dedicated Oil Handling Facility OPEP.

Suspended and Abandoned Wells

Response arrangements relating to suspended or abandoned wells must be detailed within an OPEP if an assessment by the Responsible Person has determined that the well could give rise to an oil pollution incident.

The Responsible Person must undertake an assessment to determine the risk of an oil pollution incident. As a minimum the assessment should consider the following aspects:

- Whether the well has been suspended or abandoned in accordance with industry guidelines;
- The flow potential of the well; and
- Any ongoing monitoring of the suspended or abandoned well which may indicate that the integrity of the suspended well has/may become compromised.

The Department may require the assessment be provided where the Responsible Person considers there is no risk of an oil pollution incident and therefore no requirement for an OPEP. Operators may refer to the OGUK Guidelines for the Abandonment of Wells when considering the well status and the risk of an oil pollution incident.

Installations not in Offshore Waters

If any facility which would otherwise be regarded as an offshore installation is not located in offshore waters, it is regarded as an Oil Handling Facility for the purposes of the OPRC Regulations. Such facilities are out with the scope of the OSD and the additional requirements of the 2015 amendments to the OPRC Regulations do not apply. Table A.2 below identifies the OPEP requirements for such a facility.

Decommissioning

The OPRC Regulations require OPEPs to remain in place during decommissioning activities where there is a risk of an oil pollution incident.

If the Responsible Person or Operator of the Oil Handling Facility has determined that there is no longer any risk of an oil pollution incident from the installation being decommissioned there is no requirement for an OPEP to be in place. In such circumstances the Responsible Person or Operator of the Oil Handling Facility can request that the OPEP is withdrawn. The Department may require further demonstration from the Responsible Person or Operator of the Oil Handling Facility to confirm there is no risk of an oil pollution incident from the installation being decommissioned. Where a Safety Case remains in place but there is no longer any risk of an oil pollution incident there is no requirement for an OPEP to form part of the IERP.

If following withdrawal of the OPEP the Responsible Person or Operator of the Oil Handling Facility proposes further operations which reintroduce a risk of an oil pollution incident and the proposed operations necessitate obtaining a new, or the variation of an existing, Consent to Locate (as issued by the Department under Part 4a of the Energy Act 2008), e.g. use of an accommodation unit or a heavy lift vessel, the Responsible Person or Operator of the Oil Handling Facility must detail the proposed operation within an OPEP and submit to the Department for approval.

Operations from Vessels

Oil and gas operations undertaken from vessels must be included in the scope of an OPEP in the following circumstances:

- There is a risk of oil pollution from any well, pipeline or other oil and gas infrastructure as a result of the oil and gas operations (e.g. the removal of barriers, breaking containment, well abandonment where the operation introduces a risk of oil pollution etc); or
- The oil and gas operations necessitate the vessel obtaining or the variation of an existing Consent to Locate (as issued by the Department under Part 4a of the Energy Act 2008)

If the risk of oil pollution during the oil and gas operations undertaken from a vessel is restricted to the vessel oil inventory only and there is no Consent to Locate requirement for the vessel the operations can be undertaken under the vessel SOPEP (i.e. an OPEP is not required).

In the event that oil and gas operations undertaken from a vessel must be included in the scope of an OPEP, the OPEP arrangements must detail the response arrangements to an oil release from the well, pipeline or other oil and gas infrastructure and/or from the vessel oil inventory.

The Responsible Person or Operator of the Oil Handling Facility may prepare the Production Installation/Field OPEP in anticipation of such vessel operations (i.e. the Production Installation/Field OPEP is ‘front loaded’ to include the oil spill response arrangements from oil and gas operations undertaken from vessels) or amend an approved Production Installation/Field OPEP to reflect the proposed vessel operations in accordance with the variation procedure as per section 4.7 of this Guidance.

If there is no approved Production Installation/Field OPEP relevant to the proposed operation the Responsible Person or Operator of the Oil Handling Facility must submit a TOOPEP.

For example, a Well Operator proposes to undertake well abandonment operations utilising a vessel that does not hold an NPI OPEP. The operation concerns a remote suspended well that the Well Operator had previously determined did not present a risk of oil pollution (and therefore has no approved OPEP). If the Well Operator now determines that the proposed abandonment operations introduce a risk of oil pollution from the well the Well Operator must submit a TOOPEP.

Any vessel operating under an accepted safety case is considered to be an NPI and the oil and gas operations conducted must be included within the scope of an approved OPEP in line with Section 3.1 of this Guidance.

A.2 OPEP Type Requirements

Table A.1 below identifies which OPEP types are required for different operational activities

Table A.1

Activities		**OPEP Type**				
		Onshore	Production Installation / Field	NPI OPEP	TOOPEP	Communication and Interface Plan
Production Operations	Installation (inc sub-sea tiebacks)	X	X			
	Field Multiple Installations	X	X			
	Pipelines / Oil Handling Facilities	X	X			
	FSU	X	X			
Temporary Operations	Combined Operations	X	X	X	X**	X
	Non-Combined Operations	X	X*	X	X	X
Suspended / Abandoned Wells		X	X			

*See Section A.1 for the applicability of a CIP in relation to the non-combined operations.

**See Section A.1 for the applicability of a TOOPEP in relation to combined operations

A.3 OPEP Content Requirements

Table A.2 below specifies which aspects from the Assessment Templates are required for inclusion within each OPEP type. The numbers correspond to the Consolidated OPEP Assessment Template.

Guidance for NPI OPEPs and CIPs are provided in Sections A.6 and A.7.

Table A.2

Assessment Template / supporting guidance reference (from Section A.5 and the Consolidated OPEP	**Consolidated OPEP**		**Oil Handling Facility OPEP**
	Offshore OPEP (Production Installation / Field / TOOPEP)	**Onshore OPEP**	
1. Scope of OPEP	Required	Required	Required
2. Fast Facts	Required		Required
3. Infrastructure Diagram	Required		Required
4. Response Initiation / Direction	Required	Required	Required
5. Contractor Mobilisation		Required	Required
6. Cap / Relief Well Mobilisation		Required	Required if applicable
7. Notification of Onshore Response Team	Required		Required if applicable
8. Sourcing of Real Time Modelling		Required	Required
9. Notification and Liaison with Regulatory Authorities and Statutory Bodies	Required (Initial Notifications)	Required	Required
10. Details of Regulatory Authorities and Statutory Bodies		Required	Required
11. Training		Required	Required
12. Exercises		Required	Required
13. Oil Inventories	Required		Required
14. Oil Characteristics	Required		Required
15. Worst Case Release	Required		Required
16. Limiting Environmental Risk and Response Arrangements	Required	Required	Required

17. Relief Well Details and Timing	Required in either OPEP		Required if applicable
18. Well Capping and Timings	Required in either OPEP		Required if applicable
19. Inventory of Oil Spill Response Equipment	Required	Required	
20. Dispersant Information	Required		Required if applicable
21. Response Effectiveness		Required	
22. Dispersant Product Approval	Required in either OPEP		Required if applicable
23. Dispersant Type and Efficacy	Required in either OPEP		Required if applicable
24. Oil Spill Response	Required in either OPEP		Required
25. Response Strategies	Required in either OPEP		Required
26. Oil Spill Volume Calculation	Required		Required
27. Modelling	Required in either OPEP		Required
28. Sensitivities	Required		Required
29. Emergency Contact Details	Required (Relevant to On Scene Commander)	Required	Required
30. Reporting Mechanism	Required	Required	Required
31. Response Tiers	Required	Required	Required
32. Transboundary Impacts		Required	Required
33. OCU		Required	Required
34. OCU Members		Required	Required

A.4 OPEP Assessment Templates

The following tables detail the information which must be included within each OPEP type and are aligned to the Assessment Templates available from the OMAR website. The Assessment Template will be used by the Department when reviewing OPEPs.

To facilitate the review process there is an expectation that the Responsible Person or Operator of the Oil Handling Facility will complete the ‘Location of Information’ column within the Assessment Template referencing where the relevant information can be found within the

OPEP. The completed Assessment Template should be submitted to the Department with the OPEP. Failure to provide a completed Assessment Template will prolong the review period and potentially delay the approval of the OPEP.

A.5 Guidance on Requirements for Consolidated OPEPs

Assessment Table Requirement	Guidance
1. Scope of OPEP	The OPEP must include the following: • Details of the organisation responsible for the OPEP. • Details of all infrastructure to which the OPEP relates. • Details of operations to which the OPEP relates (this should include any future operations which may be undertaken). • Where applicable an estimated spud date/date of commencement and an estimation of the operation duration. • Details of any additional OPEPs which may be required to interface with the plan e.g. third party tie-backs, NPI OPEPs etc. Where additional OPEPs exist, the relevant parties must agree who takes primacy when responding to an oil pollution incident. The agreed roles must be clearly defined within the relevant OPEP.
2. Fast Facts	The OPEP must include consolidated 'Fast Facts' which detail specific information relating to the installation(s). If the OPEP relates to multiple installations 'Fast Facts' for each must be included. The following details are required: • Installation Name • Installation Type (steel jacket, concrete gravity, FPSO, etc.) • Installation Operator Name • Well Operator Name • Field Name • UKCS Block Number • Latitude and Longitude (deg, min, sec)

	• Water Depth (m) • Direction, Location and Distance to Nearest UK Landfall (e.g. Fraserburgh, 130km, WSW) • Direction, Location and Distance to Nearest UK Protected Area (e.g. Dogger Bank, 30km, SW) • Direction, Location and Distance to Nearest median line (e.g. Norwegian, 30km, NE) • Details of neighbouring installation(s) (Name, Direction and Distance(km)) • Hydrocarbon Type (oil, condensate, gas) • Worst-Case Well Flow Rate (m^3/day) • Maximum Possible Hydrocarbon Inventory (m^3) • Largest Single Pipeline Inventory (m^3) • State if well is HPHT and/or Deep Water • Details if within Sensitive Areas or any area protected by domestic or international legislation. • Name of Pollution Response Contractor The information should be presented in a tabular form. Where OPEPs contain details of more than one installation, the worst case oil release scenario must be described for each installation as the OPRC regulations require each installation to describe its worst case scenario. However, only the Field worst case is required to be modelled.
3. Infrastructure Diagram	The OPEP must include a diagram showing all relevant field layouts. Diagrams must as a minimum include the location of all installations, tie-backs, subsea infrastructure, pipelines which are within the scope of the OPEP.
4. Response Initiation/Direction	The OPEP must state the positions of the person authorised to initiate emergency response procedures. This is usually the installation OIM. The OPEP must also state the position of the person responsible for directing the internal emergency response. This will usually be a senior member of the onshore response team.

5. Contractor Mobilisation	The OPEP must summarise the activation process and interface arrangements relating to any accredited response organisation/contractor employed. It must also identify the position responsible for undertaking the activation.
6. Cap/Relief Well Mobilisation	Where applicable, the OPEP must identify the position responsible for authorising the mobilisation of a capping operation and/or relief well operations.
7. Notification of Onshore Response Team	The OPEP must detail how offshore personnel will notify relevant onshore response teams.
8. Sourcing of real time Modelling	The OPEP must state how real time spill modelling will be sourced.
9. Notification and Liaison with Regulatory Authorities and Statutory Bodies	The OPEP must detail positions with responsibility to undertake initial notifications to the relevant Regulatory Authorities and Statutory Bodies. The OPEP must also detail the positions with responsibility for the on-going liaison with the relevant Regulatory Authorities and Statutory Bodies. This information is generally presented within a checklist. The relevant authorities and reporting requirements are listed in Appendix D.
10. Details of Regulatory Authorities and Statutory Bodies	The OPEP must contain a narrative or diagram detailing the roles, responsibilities and jurisdictions of any relevant Regulatory Authorities and Statutory Bodies. Examples include: • Maritime Coastguard Agency (MCA); • Department for Business, Energy and Industrial Strategy (BEIS); • Marine Scotland (MS); • Marine Management Organisation (MMO); • Joint Nature Conservation Committee (JNCC);

	• NatureScot/Natural England (NE)/Natural Resources Wales/Northern Ireland Environment Agency; • Scottish Environment Protection Agency (SEPA)/Environment Agency (EA); • Local Authorities; • Isle of Man Department of Infrastructure
11. Training	The OPEP must detail all relevant Oil Pollution Response training requirements in accordance with the guidance provided in Appendix C.
12. Exercises	The OPEP must detail all relevant Oil Pollution Response exercise requirements in accordance with the guidance provided in Appendix C.
13. Oil Inventories	The OPEP must detail all relevant installation/field oil inventories. This must include the following: Wells • Unique identification name/number • Worst case flow rates (m^3/day) for all wells detailed within the OPEP. The flow rate must be consistent with information provided in all other regulatory submissions • Latitude and Longitude (deg, min, sec) of wellhead(s) if located remotely from installation • Confirm if HP/HT Pipelines • Name/PL number • Maximum pipeline oil inventory (m^3) • Operator • Internal diameter (mm) • Length (km)

	Crude Oil • Maximum possible crude oil inventory on installation(s) (m^3) Diesel • Maximum possible diesel inventory on installation(s) (m^3)
14. Oil Characteristics	The OPEP must detail specific characteristics relating to the oil produced from each reservoir and the export oil. As a minimum these characteristics must include the following: • ITOPF Grouping • Specific Gravity • Viscosity • Wax Content • Asphaltene Content • Pour Point Where this information is incomplete a justification must be provided detailing why specific characteristics are unavailable. Missing characteristics must be determined at the earliest opportunity and the OPEP updated as they are established.
15. Worst Case Release	Worst case oil release information related to major accident hazards: To comply with the OPRC regulations the OPEP must detail the worst case oil release arising from the identified major accident hazard scenarios as presented in the Safety Case. This should include release quantity (m^3) and release rate (where applicable). Where OPEPs contain details of more than one installation, the worst case oil release arising from the identified major accident hazard scenario must be detailed for each installation. Worst cases oil release information for modelling purposes:

	The worst case oil release scenarios which must be used for modelling purposes are specified in appendix B.
16. Limiting Environmental Risk and Response Arrangements	The OPEP must confirm that adequate arrangements are in place to limit risks to the environment. The OPEP must contain a statement that confirms the Responsible Person or Operator of the Oil Handling Facility: • has systems and procedures in place to ensure environmental risks are identified and minimised. This includes a Safety and Environmental Management System, a process to identify and assess operational risks to the environment and ensure appropriate measures are in place to eliminate and/or mitigate them. • has systems to manage inspection and maintenance of equipment and systems to ensure all personnel are trained and competent to undertake their assigned duties. The OPEP must identify all relevant pollution response roles and responsibilities. This should sequentially detail actions required from the initiation of the response to its conclusion and should effectively highlight 'who does what and when'. This requirement may be delivered by the use of checklists.
17. Relief Well Details and Timing	If drilling a relief well has been identified as a response option, the OPEP must detail any technical or location specific constraints (e.g. deep water) that limit the number of suitable MODUs capable of this work and describe any possible delays in sourcing a suitably configured MODU. An estimation of the time required to complete the relief well operation must be included in the OPEP. This is an estimation of time required from the day the relief well operation is mobilised to the day the well is killed. A justification must be provided within the OPEP if a relief well is not deemed an appropriate response option.
18. Well Capping and Timings	If a well capping device has been identified as a source control option, the OPEP must contain the following: • Details of the capping device(s) deemed suitable for use • Confirmation that the suitability of the capping device(s) has been fully assessed and is compatible with the well infrastructure and well control equipment and is certified for the anticipated well pressures • Details of the specialist contractor(s) providing the device(s)

	• Contact details of the specialist contractor(s) A justification must be provided within the OPEP if a capping device is not deemed an appropriate source control option. An estimation of the time required to complete the well capping operation must be included in the OPEP. This is an estimation of time required from the day the capping operation is mobilised to the day the well is successfully capped.
19. Inventory of Oil Spill Response Equipment	The OPEP must fully describe the inventory of oil spill response equipment (including dispersants) available. This should reference any register of equipment held by any contracted oil spill response provider and be supplemented by any additional equipment not included in the register e.g. installation/field specific pollution response equipment and/or other prepositioned onshore equipment. The following details must be provided with regards to any such equipment: • Details of ownership • Storage locations • Transport arrangements to deployment site • Mode of deployment • Measures in place to ensure that the oil spill response equipment and procedures are maintained in an operable condition. The OPEP must confirm that an oil spill sampling strategy is in place as detailed
20. Dispersant Information	If dispersant use is identified as part of the oil spill response strategy the OPEP must confirm that the Responsible Person or Operator of the Oil Handling Facility has determined that all dispersants selected (including onsite and offsite stocks) are suitable for use. In making this determination Responsible Persons or Operators of Oil Handling Facilities should consult documentation such as IPIECA/OGP JIP19 'Guidelines on Oil Characterization' and JIP4 'At-sea Monitoring of Surface Dispersant Effectiveness' to ensure dispersant selection has been based on a consideration of relative dispersant efficacy, oil characteristics, impact of oil weathering, dispersant availability, deployment logistics etc. Should oil characteristic information be unavailable e.g. in the case of exploration drilling the OPEP must state this. In such circumstances the OPEP must confirm that all dispersants selected (including onsite and offsite stocks) have been determined as suitable for use and include a description of how this determination was made.

	The OPEP is not required to specify trade names or type of dispersants selected for use, however Responsible Persons or Operators of Oil Handling Facilities must ensure that all information used to determine the suitability of selected dispersants is retained and available for review on request by the Department. If the oil spill response strategy utilises onsite dispersant stocks held on the ERRV, other response vessel or offshore installation the OPEP must detail the following: • The dispersant quantity held onsite (m^3), location of onsite stocks, method of deployment and the measures in place to ensure the deployment method is maintained (e.g. $5m^3$ of dispersant is held on the ERRV which would be deployed using spray booms. Testing of the spray booms is undertaken monthly to ensure their continued availability); and • Confirmation that onsite dispersant capability will be maintained if the vessel holding stock is replaced with an alternative vessel. If the oil spill response strategy utilises offsite dispersant stocks such as those held by an appointed oil spill response contractor or other prepositioned onshore stocks available to the Responsible Person or Operator of the Oil Handling Facility, the OPEP must detail the following: • Confirmation that the Responsible Person or Operator of the Oil Handling Facility has access to offsite dispersant stocks available for deployment following a tier 2/3 incident; • Confirmation that the Responsible Person or Operator of the Oil Handling Facility has access to appropriate method(s) to deploy the offsite stocks; and • The estimated time to deploy offsite stocks to the offshore installation or Oil Handling Facility. This information may be provided by describing how these requirements are delivered by an appointed oil spill response contactor or other organisation. This description should be supplemented by link(s) to documentation detailing the capability of the oil spill response contractor. If dispersant is not identified as part of the oil spill response strategy justification must be provided within the OPEP.

21. Response Effectiveness	The OPEP must contain a link to the OGUK Oil Spill Response Effectiveness Register in UK Waters Guidelines (http://www.oilandgasuk.co.uk/publicationssearch.cfm) and/or detail the relevant location and operation specific information from that document.
22. Dispersant Product Approval	If chemical dispersants have been identified as part of the response strategy, Responsible Persons or Operators of Oil Handling Facilities must ensure that the dispersants selected are included within the MMO list of approved dispersants.
23. Dispersant Type and Efficacy	Where dispersant use has been identified as a response strategy, the OPEP must include all relevant dispersant use and approval requirements of the Guidance detailed in Appendix F.
24. Oil Spill Response	The OPEP must detail the arrangements in place with any specialist oil spill response contractor. Details must include the following: • Name and contact details of the accredited oil spill response contractor, • Response capabilities of the contractor. This may be demonstrated by a link to the contractor capability statement. Evidence of contracts, mobilisation arrangements and capabilities may be requested by the Department prior to approval of the OPEP. Where the Responsible Persons or Operator of Oil Handling Facilities have additional oil spill response equipment available e.g. location specific equipment, the OPEP must provide details and describe the capability of the equipment. For all response resources identified the OPEP must detail the time taken to deploy the resource on location. If the worst case spill modelling indicates that the oil pollution is likely to beach, the OPEP must provide confirmation that appropriate spill response resources can be mobilised and deployed to any beaching location in the UK in sufficient time to allow response measures to be implemented and minimise the impact of any pollution. Where necessary, has confirmation been provided that a Shoreline Protection Plan (SPP) has been created and that the Local Authority has been consulted on this plan. See Appendix G for the SPP requirements.

	The OPEP must detail the name of the licensed operator(s) with Offshore Pollution Liability Association Ltd (OPOL) membership for the potential liabilities arising from the offshore oil and gas operations that are within the scope of the OPEP.
25. Response Strategies	The OPEP must identify appropriate strategies to facilitate a prompt and effective response to a pollution event, including details of how and when they would be employed. These details must include strategies which are specific to the location(s) within the OPEP (e.g. surveillance, dispersants, oil recovery, etc.). Appendix I details specific aerial surveillance requirements. The following strategies are available. A brief justification must be provided if they are not deemed appropriate: • Monitoring and Surveillance (from installation, vessel, aircraft, satellite); • Dispersion (natural or chemically/mechanically assisted); • Containment and Recovery (booming and mechanical recovery); • Source Control (well capping and relief well operations). If controlled burning is identified as a potential response option justification to support this must be provided.
26. Oil Spill Volume Calculation	Responsible Persons or Operator of Oil Handling Facilities must establish the quantity of any oil released to sea. The OPEP must detail how such quantifications will be undertaken acknowledging that there are a number of methods to achieve this: • Measured, e.g. quantities are determined based on level indication, tank drop, tank volume, metering etc; • Calculated, e.g. quantities are determined based upon a known flow rate to sea for a known duration, an estimated flow rate and duration, or calculated from known quantities and known concentrations; • Bonn Agreement Oil Appearance Code (BAOAC) estimations of oil on the sea, e.g. quantities are determined based upon observations of sheen size and appearance on the sea surface. A maximum and minimum figure shall be provided where BAOAC are utilised in order to allow a suitable assessment of potential pollution, in accordance with the Department's PON1 Guidance. Responsible Persons or Operators of Oil Handling Facilities should use all available methods at their disposal to ensure that quantification of oil to sea is as accurate as possible.

	The movement of any visible pollution must also be tracked and methods used to undertake this must be detailed within the OPEP. A conversion table to aid reporting (e.g. m^3 to tonnes) should be included.
27. Modelling	The OPEP must include modelling which meets the requirements of the Guidance detailed in Appendix B.
28. Sensitivities	The OPEP must contain details of relevant environmental sensitivities. These include: • Seabird vulnerability spanning a calendar year for each block within the scope of the OPEP and all adjoining blocks; • Fishery sensitivities, spawning and nursery grounds spanning a calendar year within the appropriate ICES square; • Cetacean sensitivities spanning a calendar year in the surrounding area; • Location and name of all UKCS protected areas which may be impacted in the event of a worst case release.
29. Emergency Contact Details	The OPEP must contain a list of all relevant emergency contact details, which include: • Regulatory Authorities and Statutory Bodies (including relevant Conservation Agencies); • Relevant Local Authorities; • Oil Spill/Emergency Response Contractor(s); • All relevant onshore and offshore emergency contact details. This means that the OPEP must include permanently manned 24hr contact telephone numbers for all relevant offshore installations and for the relevant onshore emergency response team (duty manager etc). • Contact details for neighbouring installations or pipelines.
30. Reporting Mechanism	The OPEP must confirm that all releases of oil to sea, regardless of quantity must be reported in accordance with the Department's PON1 Guidance. The OPEP must detail all relevant reporting requirements, mechanisms and timelines. The OPEP must define the different situations by which each statutory body should be contacted and by what method.

	The PON1 Guidance contains the current reporting requirements and timelines. A summary of reporting requirements is provided in Appendix D of this Guidance and the relevant sections must be included within the OPEP.
31. Response Tiers	The OPEP must provide a description of how response tier levels are identified and escalated. Tier level response must be consistent with the NCP. Where response arrangements transfer from one Responsible Person or Operator of an Oil Handling Facility to another, the mechanism and management for this must be described in the OPEP (e.g. where an Installation Operators Tier 1 response transfers or escalates to the Well Operators Tier 2/3 response).
32. Transboundary Impacts	The MCA have responsibility, via various international agreements, to notify Coastal States if pollution is likely to enter their waters. Responsible Persons or Operators of Oil Handling Facilities must therefore assess any potential for transboundary impact and describe in the OPEP how the MCA would be informed.
33. Operations Control Unit	The OPEP must detail the relevant interfaces with the OCU and must also identify the location and address of the OCU and confirm that it meets all requirements provided in Appendix H.
34. Operations Control Unit Members	The OPEP must detail the positions identified to fulfil key roles in the event that an OCU is established. These roles are: • The Emergency Operations Manager (EOM); • The Operator's Representative (or Representatives if more than one Operator involved); • The Operator's Technical Representative who would attend the OCU. It is not acceptable to have one position fulfil all roles within the OCU. Selected positions must have the authority to speak and act on behalf of the Responsible Persons' or Operator of the Oil Handling Facilities' organisation. The EOM, and other relevant response personnel, must be appropriately trained, as detailed in Appendix C and the Oil Spill Response Training guidelines for the UK offshore oil and gas industry

A.6 Guidance on Requirements for Non Production Installation (NPI) OPEPs

Assessment Table Requirements	Guidance
1. Response Initiation / Direction	The NPI OPEP must detail the positions of persons on the installation who will initiate and direct the oil spill response. The NPI OPEP must state that, in the scenario when the response to any incident is directed by person(s) who are not the owner of the NPI that further arrangements explaining the interface will be described in the relevant TOOPEP or CIPs.
2. Notification and Liaison with Regulatory Authorities and Statutory Bodies	The NPI OPEP must detail the positions of persons responsible for the notification of any oil release to the relevant authorities. The NPI OPEP must state that when the response requires liaison with the authority responsible for the NCP (MCA) it will be described in the relevant TOOPEP or CIP. The relevant authorities and reporting requirements are listed in Appendix D.
3. Training and Exercises	The NPI OPEP must detail all relevant Oil Pollution Response training and exercise requirements in accordance with the guidance provided in Appendix C.
4. Worst Case Release	The NPI OPEP must describe the worst case oil release applicable to the NPI. The Production Installation/Field OPEP or TOOPEP will detail the worst case oil release applicable upon commencement of oil and gas activities. This will likely be a loss of well control or pipeline inventory. However it is accepted in certain circumstances the NPI oil inventory may represent the worst case (e.g. when drilling dry gas wells). In such cases the release of this inventory must be modelled in the TOOPEP or CIP in accordance with the modelling guidance in Appendix B.
5. Limiting Environmental Risk and Response Arrangements	The NPI OPEP must contain a description of the steps taken to limit the risks to the environment. This may include references to the safety case and / or by demonstrating that suitably robust systems to train staff and assess competence and that relevant procedures are in place particularly with regard to emergency response. The OPEP must identify all relevant pollution response roles and responsibilities. This should sequentially detail actions required from the initiation of response to its conclusion and should effectively highlight ‘who does what and when’. This requirements may be delivered by the use of the checklists.

6. Resources Available	The NPI OPEP must state that the required well / location specific inventory of oil spill response equipment will be provided in the Production Installation / Field OPEP or TOOPEP.- The NPI OPEP must also detail any additional oil spill response equipment maintained by the NPI owner that is not listed in the Production Installation / Field OPEP or TOOPEP.
7. Response Effectiveness	The NPI OPEP must state that the required well / location specific oil spill response effectiveness information will be provided in the Production Installations / Field OPEP or TOOPEP.
8. Dispersants	The NPI OPEP must state that any well / location specific information relating to dispersants will be detailed within the Production Installation / Field OPEP or TOOPEP.
9. Potential Environmental Effects	The NPI OPEP must state that the location specific TOOPEP, Installation OPEP or CIP will contain an assessment of the potential environmental effects resulting from a release of oil including modelling and environmental sensitivities. The NPI OPEP must state that measures identified to prevent, reduce or offset the potential effects resulting from a release of oil will be provided in the Production Installation / Field OPEP or TOOPEP.
10. Reporting Requirements	The NPI OPEP must detail the method by which reporting to the relevant Authorities will take place (i.e. PON1 reporting arrangements). See Appendix D. The NPI OPEP must state that the location specific contact details will be provided within the Production Installation / Field OPEP, TOOPEP or CIP.

A.7 Guidance on Requirements for Communication and Interface Plans

Assessment Table Requirement	Guidance
1. OPEP Interface	The CIP must detail the NPI Owner, the Installation Operator and the Well/Pipeline Operator. The document must also identify the OPEPs to which it relates e.g. Onshore OPEP, NPI OPEP or Production Installation / Field OPEP The CIP must also include the contact details for the NPI undertaking the operations
2. Oil Inventories	The CIP must provide any well / pipeline details relevant to the proposed operation. This should include any oil inventories / well flow rates which have not been referenced in either the Production Installation / Field OPEP or the NPI OPEP. When required, it must include the following: **Wells** • unique identification name/number • worst case flow rates (m^3/day) for all wells detailed within the OPEP. The flow rate must be consistent with information provided in all other regulatory submissions; • location of wells – Latitude and Longitude (deg, min, sec); • HP/HT **Pipelines** • name/PL number; • maximum pipeline oil inventory (m^3); • pipeline operator; • internal diameter (mm); • length (km); and

	Diesel • maximum possible diesel inventory on installation(s) and/or vessel(s) (if applicable) (m^3).
3. Description of Operation	The CIP must provide a brief description of the operations to be undertaken, the infrastructure which is to be worked on, the duration of operations and a description of the worst case release. The anticipated commencement date of the operations should also be provided.
4. Scope	The CIP must clearly describe the interfaces between all OPEPs to which the Plan relates. It must also provide details of response roles and responsibilities and identify who would take primacy in the event of potential oil pollution scenarios
5. Notifications and Liaison with Regulatory and Statutory Bodies	The CIP must detail the positions which have responsibility to make the initial notification to the relevant Regulatory Authorities and Statutory Bodies following a pollution event. It should also detail the positions which have responsibility for the on-going liaison with these Regulatory Authorities and Statutory Bodies. If the positions responsible for the on-going liaison are detailed in the Onshore OPEP and/or Production Installation/Field OPEP, the CIP should confirm this and reference the relevant OPEP stating where the information can be located within that document.
6. Roles and Responsibilities	The CIP should provide a description of the positions with responsibility to provide a response to an oil pollution incident. If this information is contained in the relevant Onshore OPEP and/or Production Installation / Field OPEP stating where the information can be located within that document.
7. Additional Oil Spill Response Equipment	If additional oil spill response equipment e.g. dispersant or booming / containment equipment is required for the operation, details should be provided in the CIP. The following details must be provided with regards to any such additional equipment: • Details of ownership; • Storage locations; • Transport arrangements to deployment site; • Mode of deployment; and • Measures in place to ensure that the oil spill response equipment and procedures are maintained in an operable condition.

8. Modelling	If the operation gives rise to a new worst case oil release scenario (either ongoing or instantaneous), spill modelling must be updated. The updated model should be provided within the CIP if the new worst case is not a permanent change. If the new worst case is a permanent change the Production Installation / Field OPEP should be amended.
9. Exercises	The CIP should describe any additional spill response exercise requirements resulting from the operaion. See Appendix C for further guidance on exercise requirements.
10. Operations Control Unit	If additional OCU membership is required as a result of the proposed operation, the CIP must highlight which positions may attend the OCU following a SOSREP invitation.

Appendix B – Modelling Guidance

B.1 Modelling Requirements

Where applicable OPEPs must contain modelling which illustrates the worst case oil release associated with the following categories.

It is for the Responsible Person or Operator of the Oil Handling Facility to assess which categories are relevant to their operation and to determine the worst case scenario for each.

(i) Reservoir Fluids:

Worst case well oil release scenario. If applicable, a declining flow rate (e.g. on cessation of artificial lift / reservoir pressure support) can be modelled if appropriate justification is provided.

This should be modelled as an ongoing release in accordance with B.2 below.

If the scope of the OPEP includes an oil release scenario from a well this modelling must be provided.

(ii) Stored Crude Inventory:

On installations where crude is stored the following should be modelled:

- maximum possible stored crude inventory on-board an FPSO or FSU
- maximum possible stored crude inventory in any connected subsea storage facility or vessel

This should be modelled as an instantaneous release.

(iii) Operations within 40km of the coast:

Where the installation or in-field pipeline is within a block wholly or partly within 40 km of the coast the largest of the following inventories should also be modelled in addition to (i) and (ii) above:

- maximum possible oil inventory of any in-field pipeline (modelled from the point closest to the shore)
- maximum possible diesel inventory on-board the installation, MODU or vessel (whichever is greatest)

This should be modelled as an instantaneous release.

The modelling of a smaller volume of pipeline inventory is acceptable if appropriate justification is provided to show that it would be worst case.

There is no requirement to model in field pipeline or diesel inventories if a model has already been completed as per section (ii) above for a larger hydrocarbon inventory.

(iv) Major Trunk Pipeline:

Maximum oil inventory of a major trunk pipeline modelled from three locations, installation, mid-point and near-shore (15km from coast).

This should be modelled as an instantaneous release.

It is for the Responsible Person or Operator of the Oil Handling Facility to assess which categories are relevant to their operation and to determine the worst case scenario for each.

In addition a Responsible Person or Operator of the Oil Handling Facility may model other scenarios if it would facilitate the response to smaller oil releases.

If there is a reduction in the significance of any modelled worst case remodelling is not required until the next 5 year review of the OPEP. At the next 5 year review the model(s) should be updated to reflect the reduced worst case or a justification provided in the OPEP to demonstrate why the previous modelling remains suitable.

B.2 Model Input

The model should accurately represent the worst case scenarios detailed in B.1 above (e.g. if the worst case release location is subsurface, appropriate subsurface modelling must be carried out).

A minimum two year data-set of hydrodynamic and meteorological parameters must be used.

When selecting analogous oil the following minimum parameters should be used. If these minimum parameters cannot be used a justification must be provided:

- Specific Gravity
- Viscosity
- Wax Content
- Asphaltene Content
- Pour point

Modelling of the actual oil, based on appropriate weathering studies should be undertaken whenever possible.

Stochastic modelling must be undertaken as follows:

- Using a minimum two year time series data-set;
- A minimum of 100 runs should be performed (a lower number of runs may be acceptable when accompanied by sound scientific or statistical justification);

- The duration of the model period must be appropriate to the scenario. The duration of the release period must be justifiable and should consider any discrepancy between the duration of the modelling and the identified time period required to stop the release;
- For production operations or operations extending over a year, modelling must be carried out for each season; Winter (Dec-Feb), Spring (Mar-May), Summer (Jun-Aug) and Autumn (Sept-Nov);
- For temporary operations e.g. drilling/well intervention; the season(s) during which the operation is to be undertaken must be used for modelling purposes. For operations which could be subject to change it is recommended that all four seasons are modelled;
- The model results must be displayed to an oil thickness of 0.3µm.

B.3 Model Output Requirements

The OPEP must include a pictorial representation of the stochastic time series data to illustrate the minimum arrival time for oil to cross median line(s) and to reach beaching location(s). A generic example is provided in Figure B.1.

The information in Table B.2 must be included within the OPEP, presenting the beaching/median crossing probability to at least 1%.

The OPEP must include a pictorial representation of a seasonal probability plot with the probability threshold displayed to at least 10%. A generic example is provided in Figure B.2.

Diagram colour schemes are at the discretion of the Responsible Person or Operator of the Oil Handling Facility.

The information shown in Table B.3 must be included within the OPEP.

Figure B.1 – Generic seasonal arrival time plot illustrating the worst case scenario

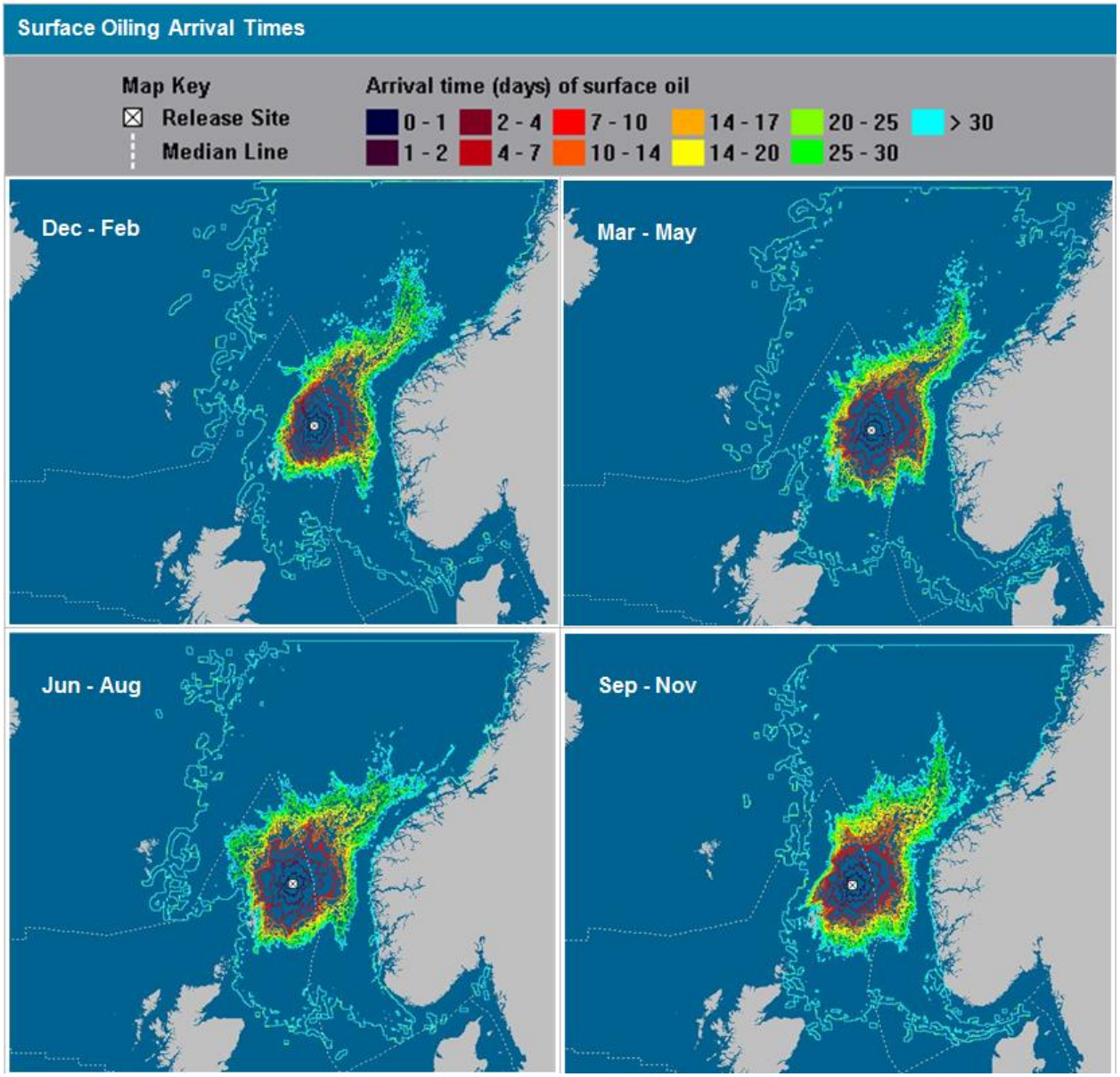

Table B.2 – Template of required information to support Figure B.1 and B.2

Oil Spill Modelling Summary								
Spill Scenario / Descriptor	*e.g. Well Blowout*				*e.g. Loss of diesel inventory*			
Median Crossing								
Identified Median Line	**Probability and shortest time to reach**							
	Dec – Feb	Mar – May	Jun – Aug	Sep – Nov	Dec - Feb	Mar – May	Jun – Aug	Sep - Nov
e.g. Norway	%	%	%	%	%	%	%	%
	hrs	hrs	hrs	hrs	hrs	hrs	hrs	hrs
e.g. Denmark	%	%	%	%	%	%	%	%
	hrs	hrs	hrs	hrs	hrs	hrs	hrs	Hrs
Landfall								
Predicted Locations	**Probability and shortest time to reach**							
	Dec – Feb	Mar – May	Jun – Aug	Se – Nov	Dec – Feb	Mar – May	Jun – Aug	Sep – Nov
e.g. Aberdeenshire	%	%	%	%	%	%	%	%
	hrs	hrs	hrs	hrs	hrs	hrs	hrs	hrs
e.g. Moray	%	%	%	%	%	%	%	%
	hrs	hrs	hrs	hrs	hrs	hrs	hrs	hrs
Volume Beached (m^3)								
Key sensitivities at risk								
Sensitivities / sites of concern								

Predicted locations within the UK should specify the geographical location of the beaching e.g. Moray Coast, West coast of Shetland. International beaching locations may use a broader geographical description e.g. West coast of Norway.

Figure B.2 – Generic diagram illustrating the probability of oil beaching and crossing median lines

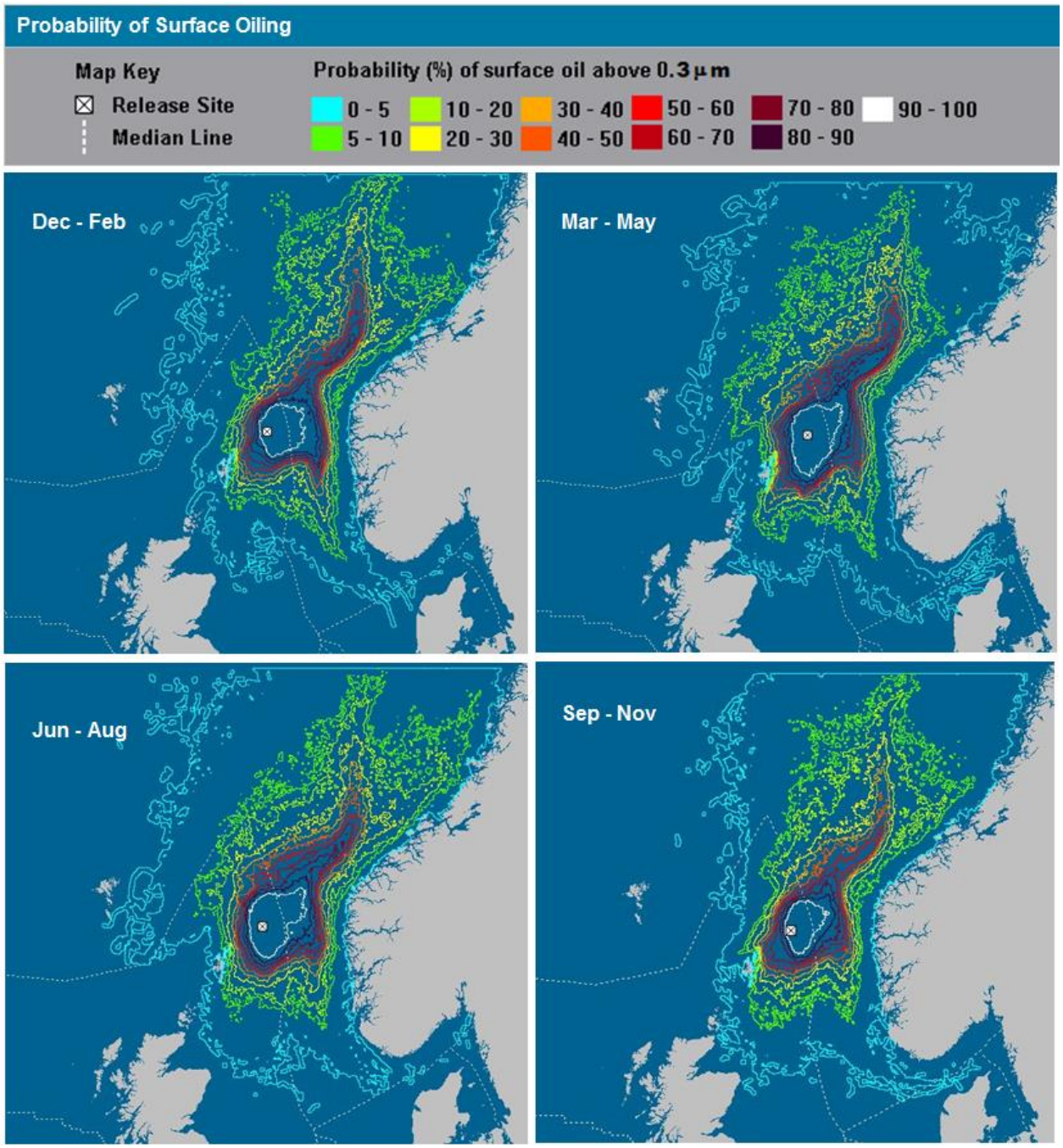

Table B.3 – Oil spill modelling parameters

Oil Spill Modelling parameters								
Well / inventory loss parameters								
Loss from Well / FPSO / Rig / Other (please specify)					Instantaneous loss?		Yes / No	
Worst case volume			m^3		Will the well self-kill?		Yes / No	
Flow rate			m^3 per hour or day		If yes, when?		Days / Hours	
Justification for predicted worst case volume								
Location								
Spill Source Point			Latitude			Longitude		
Installation / Facility name						Quad / Block		
Hydrocarbon properties								
Hydrocarbon name								
Assay available			Yes / No	Was an analogue used for spill modelling?				Yes / No
	Name	ITOPF Category	Specific Gravity	API	Viscosity at temp	Pour Point (°C)	Wax Content (%)	Asphaltene Content (%)
Hydrocarbon								
Analogue								
Fuel loss	Diesel							
Metocean parameters								
Air Temperature			°C		Sea Surface Temperature		°C	
Wind data			Data period				(minimum of 2 years required)	

Wind data reference			
Current data	Data period		(minimum of 2 years required)
Current data reference			
Modelled release parameters			
Surface or Subsurface	Surface/Subsurface/Both	Depth	m
Release duration	Days	Instantaneous?	Yes / No
Persistence duration	Days	Release rate	m^3 per hour
Total simulation time	Days	Total release	m^3
Oil spill modelling software			
Name of software		Version	

Appendix C – Training and Exercises

C.1 Training

Personnel with oil spill response duties must be trained appropriately.

A summary of relevant accredited training courses is detailed in Table C.1 below.

Table C.1

Course Title	OPEP Training Level	IMO Equivalent	Suggested Course Duration	Refresher Frequency Requirement
On-Scene Commander	1	-	4 Hours	Every 3 years
Corporate Management	2	-	4 Hours	Every 3 years *
Onshore Emergency Responder	3	-	24 Hours	Every 3 years *
IMO Level 2 Onshore Emergency Responder	4	Level 2	32 Hours	Every 3 years * (1 day refresher)

* Refresher training must be completed within 3 months of certificate expiry. Failure to do so will require full re-certification by completing the entire training course.

The OPEP must confirm the following:

- Personnel who undertake the role of On Scene Commander are trained to OPEP Training Level 1;
- Personnel who undertake the roles of Emergency Operations Manager and the Operators Representative within the OCU are trained to at least OPEP Training Level 2;
- Personnel who undertake the roles of Duty Manager, Emergency Room Manager and/or Incident Commander (within the Incident Command System) must be trained to at least OPEP Training Level 2;
- Personnel who undertake the role of Environmental Advisor within the Emergency Room are trained to at least OPEP Training Level 3; and
- The Responsible Person or Operator of the Oil Handling Facility has access to personnel trained to OPEP Training Level 4.

For the purposes of this Guidance 'Duty Managers' are considered to be persons who initially assess the circumstances of any reported incident, determine its significance and if required make the decision to mobilise the emergency response teams and activate the Responsible Person's or Operator of the Oil Handling Facilities emergency response facility. An 'Emergency Room Manager' is considered to be the person who takes charge of the Responsible Person's or Operator of the Oil Handling Facilities emergency response room to ensure the efficient operation of the room and effective delivery of its emergency response function.

For NPI Owners the OPEP Training Level requirements are only mandatory in circumstances where the role of On-Scene Commander is undertaken by NPI personnel and/or any onshore emergency oil spill response role is undertaken by the NPI Owners.

C.2 Exercises

The OPEP must state the frequency of oil pollution exercises in line with Table C.2 below.

Exercises conducted must be relevant to the specific OPEP and the programme of exercises should encompass all relevant aspects of the operations being undertaken (e.g. production and drilling scenarios).

Table C.2

Type of Exercise	**Exercise Frequency**	**General Requirements**
Offshore Production Operation	Persons with pollution response duties identified in the OPEP must participate in a minimum of 1 exercise per calendar year	A sufficient number of exercises must be completed to ensure all persons with responsibilities for implementing the OPEP participate in at least one exercise per calendar year. It is acceptable in the case of Normally Unmanned Installations (NUI) that exercises are undertaken onshore. In the case of NPI operations it is acceptable for OPEP exercises to be undertaken onshore prior to NPI mobilisation. The scenario should incorporate a sufficiently large liquid hydrocarbon release to sea to enable consideration of escalation of the response to Tier 2. To achieve this, it is likely that the release quantity will be >1 tonne.
Offshore Drilling Operation	Persons with pollution response duties identified in the OPEP must participate in a minimum of 1 exercise per calendar year for each OPEP*	
Offshore Vessel Operation	Persons with pollution response duties identified in the OPEP must participate in a minimum of 1 exercise	

	per calendar year for each OPEP*	It should be noted that when operations commence which are within the scope of a new TOOPEP or Installation/Field OPEP all relevant personnel must participate in an exercise at the earliest opportunity. NPI personnel with roles and responsibilities identified within a TOOPEP or Installation/Field OPEP must participate in oil spill response exercises at the required frequency. If two or more installations commence combined operations all relevant personnel should participate in an exercise to jointly test pollution response requirements at the earliest opportunity.* It is the responsibility of the well/installation operator to ensure exercises undertaken fully test the relevant roles and responsibilities of NPI personnel. *The OPEP should state this as a minimum requirement. If it is not operationally feasible to achieve, Responsible Persons or Operators of Oil Handling Facilities should contact their assigned BEIS Environmental Inspector and provide a justification as to why the requirement cannot be met. Assessment will be made on a case by case basis.
Deployment of ERRV Dispersant Application Equipment	Monthly	If identified as part of the pollution response strategy, dispersant spraying equipment must be tested monthly. Records must be retained for a minimum of three years and made available to the Department on request. Records should as a minimum consist of: Date when test was undertaken Name of person(s) undertaking test Details of actions identified during test

Deployment of Offshore Oil Recovery Equipment	Minimum 1 per calendar year	If identified as part of the location specific pollution response strategy, oil recovery equipment must be tested and deployed annually. Records must be retained for a minimum of three years and made available to the Department on request. Records should as a minimum consist of: Date when test was undertaken Name of person(s) undertaking test Details of actions identified during test
Onshore OPEP Response	Minimum 1 per calendar year	The scenario must ensure that all relevant onshore personnel are exercised with regard to the roles and responsibilities identified within the 'onshore' OPEP. The scenario must be relevant to the operations being undertaken and incorporate a sufficiently large release to sea of liquid hydrocarbon which fully mobilises the Responsible Persons or Operator of the Oil Handling Facilities emergency response teams. Where large organisations have multiple emergency response teams, the Responsible Person or Operator of the Oil Handling Facility must ensure that sufficient numbers of personnel are involved in oil pollution exercises on an annual basis to ensure that there is sufficient resilience in place. The exercise must test communication interfaces between onshore and offshore teams and also with any relevant oil spill response contractor. This exercise may also incorporate an offshore pollution response exercise. For NPI Owners the exercise requirements are only mandatory in circumstances where any NPI personnel have roles and

		responsibilities identified within the Operation specific OPEPs. Exercises must be undertaken annually and may be combined (at the appropriate frequency) with the Tier 3 exercise referenced below.
Tier 3 Exercise Operators of Production Installations/Connected Infrastructure	Every 3 years or within 12 months of initial approval of certain OPEPs as specified in the General Requirements.	A Tier 3 Exercise must be held within 12 months of a Responsible Person or Operator of the Oil Handling Facility receiving approval for an OPEP which details a Tier 2/3 response involving a production installation/connected infrastructure and the Responsible Person or Operator of the Oil Handling Facility has not held a Tier 3 Exercise in the previous three years. The timing for this will be agreed with the Department in consultation with the SOSREP and other participating agencies. Thereafter all Responsible Persons or Operators of Oil Handling Facilities holding an approved OPEP which details a Tier 2/3 response involving a production installation/ connected infrastructure are required to hold an exercise every three years. The location and timing of such exercises must be discussed and agreed with the Department. All Tier 3 Exercises will be evaluated by the Department to ensure the requirements of the OPRC Regulations and this Guidance are demonstrated.
Oil Spill Response Workshop Non Production Installation Owners, Well Operators and Pipeline Operators	Attendance at Workshop (every 3 years)	All NPI Owners, Well Operators and Pipeline Operators involved in oil and gas operations employing personnel trained to OPEP Training Level 1, 2, 3 or 4 who are not required to undertake a Tier 3 Exercise must attend an oil spill response workshop every three years.

		The workshop will enable key personnel to gain a better understanding on the interaction between the various pollution responders, their respective functions and how the National Contingency Plan supports the OPEP. The workshop is intended for personnel with a pollution response role and highlights aspects such as the role of the Responsible Persons or Operators of Oil Handling Facilities the Department, MCA, SOSREP, Environment Group and key pollution response contractors. Responsible Persons and Operators of Oil Handling Facilities required to attend this workshop will be notified by the Department of the date and location of workshops. It should be noted that a well operator may in specific cases be required to undertake a full Tier 3 Exercise as detailed below in this table.
Tier 3 Exercise Oil Pipeline Operators/ Well Operators	Attendance at Workshop (every 3 years)	Well operators or operators of oil pipelines may have a specific Tier 2/3 pollution response role which will be detailed in the relevant OPEP arrangements. To recognise this role such operators, if they have not held a Tier 3 Exercise in the previous three years, must attend a workshop led by the Department every three years. The workshop is intended for personnel with a pollution response role and highlights aspects such as the role of the pipeline or well operator, the Department, MCA, SOSREP, Environment Group and key pollution response contractors. The workshop will enable key response personnel to gain a better understanding on the interaction between the various pollution responders, their respective functions and how the National Contingency Plan supports the respective OPEP.

		Pipeline and well operators required to attend this workshop will be notified by the Department of the date and location of workshops. It should be noted that a well operator may in specific cases be required to undertake a full Tier 3 Exercise as detailed below in this table.
Tier 3 Exercise – Well Operators	Before or during Well Operation (in specific cases)	In certain specific cases the Department can require that a well operator undertakes a Tier 3 Exercise before or during the well operation where an OPEP detailing a Tier 2/3 response has been approved by the Department and where the well operator has not held a Tier 3 Exercise in the previous three years. Such requirements would be determined on a case by case basis and would consider aspects such as the location, the nature and complexity of the proposed well operation and the type of fluids associated with the operation.
Tier 3 Exercise Gas / Gas Condensate Operator	Attendance at Gas Operators Workshop (every 3 years)	Due to the difficulties in exercising an oil pollution incident which necessitates a Tier 3 response, Responsible Persons or Operators of Oil Handling Facilities holding an approved OPEP which details a Tier 2/3 response involving a production installation/ connected infrastructure only producing gas/gas condensate must attend a workshop led by the Department every three years. The workshop is intended for personnel with a pollution response role and highlights aspects such as the role of the Responsible Person or Operator of the Oil Handling Facility, the Department, MCA, SOSREP, Environment Group and pollution response contractors. The workshop will enable key personnel to gain a better understanding of the interaction between the various pollution responders, their respective functions and how the National Contingency Plan supports the respective OPEP.

		For gas condensate producing installations where the fluids produced are limited to ITOPF category Group 1, Responsible Persons or Operators of Oil Handling Facilities may be able to attend the above workshop instead of a Tier 3 Exercise. This will be determined on a case by case basis. Should you wish to attend the workshop you should contact the Department to confirm eligibility. The Department deems attendance at the workshop as meeting the Tier 3 Exercise requirements of this Guidance. The Department will advise of the timings and location of workshops. Those who fail to attend will be required to undertake an evaluated Tier 2/3 response exercise.
Deployment of counter pollution response equipment	Every 3 years	Responsible Persons or Operators of Oil Handling Facilities must ensure that equipment owned or contracted for counter pollution response purposes is deployed and tested at least every three years. It is incumbent upon the Responsible Persons or Operators of the Oil Handling Facilities to ensure all such equipment is tested and evidence of such tests may be required by the Department at any time.

C.3 Retention of Records

As a minimum the following records must be retained for a period of five years at the site of the exercise and made available to the Department on request:

- Scenario details
- Exercise participants
- Log of actions undertaken
- Copies of any PON1 notifications
- Copies of other documents generated during exercise (calculations of oil quantities, response checklists etc.)
- Debrief report
- Details of any actions/improvements resulting from the exercise

Appendix D – Oil Spill Reporting Arrangements

Table D.1

Hydrocarbon volume to sea	Organisation	Areas within 40 km of the shoreline	Environmentally sensitive areas	Any other areas
0-1 tonnes	Aberdeen CGOC	PON1	PON1	PON1
	Coastguard	Telephone	Telephone	PON1 (also telephone if release is ongoing)
	BEIS	Telephone and PON1	PON1	PON1
	JNCC	PON1	PON1	PON1
	MS*	PON1	PON1	PON1
	MMO*	PON1	PON1	PON1
	SNCB**	N/A	N/A	N/A
1-25 tonnes	Aberdeen CGOC	PON1	PON1	PON1
	Coastguard	Telephone	Telephone	Telephone
	BEIS	Telephone and PON1	Telephone and PON1	Telephone and PON1
	JNCC	Telephone and PON1	Telephone and PON1	PON1
	MS*	Telephone and PON1	Telephone and PON1	PON1
	MMO*	PON1	PON1	PON1
	SNCB**	Telephone	Telephone	N/A
More than 25 tonnes	Aberdeen CGOC	PON1	PON1	PON1
	Coastguard	Telephone	Telephone	Telephone
	BEIS	Telephone and PON1	Telephone and PON1	Telephone and PON1
	JNCC	Telephone and PON1	Telephone and PON1	Telephone and PON1
	MS*	Telephone and PON1	Telephone and PON1	Telephone and PON1
	MMO*	PON1	PON1	PON1
	SNCB*	Telephone	Telephone	N/A

* PON1/Telephone notifications (where applicable) are to be provided to MS and/or MMO in following circumstances:

- any release occurring at or North of 56° 46’ 39“ must be reported to MS
- any release occurring at or South of 55° 45’ 01“ must be reported to MMO.
- any release between 56° 46’ 39“ and 55° 45’ 01“ must be reported to MS and MMO.

Note – The IRS automatically distributes PON1 notification to MS and/or MMO based on the reported location of the release. In the event that IRS is unavailable the PON1 proforma directs the reporter to include MS and/or MMO on the PON1 distribution list.

** Statutory Nature Conservation Bodies are: NatureScot/Natural England (NE)/Natural Resources Wales/Northern Ireland Environment Agency (NIEA). The OPEP should detail which are relevant in each case.

Note - all telephone notifications must be made without delay and within one hour. All electronic PON1 submissions must be made within 6 hours in accordance with the Department’s PON1 Guidance.

Appendix E – Oil Spill Sampling Requirements

E.1 Oil Sampling Capability

All OPEPs must contain details outlining the strategy with regards to taking samples of oil from the sea surface. The required information must include the following:

- Confirmation that the OPEP holder has the ability to obtain an oil sample from the sea surface in accordance with the methodology described in MCA STOp Notice 4/2001 (Advice to Local Authorities on the collection and Handling of Oil Samples); and
- Confirmation that the OPEP holder can access the relevant equipment and expertise to comply with the oil sampling methodology in MCA STOp Notice 4/2001 at all times.

E.2 When to Obtain Oil Samples from the Sea Surface

The OPEP must confirm that consideration will be given to taking samples of oil from the sea following every incident which has resulted in visible pollution.

The OPEP must also confirm that the Responsible Person will, if sea state and vessel operating restrictions allow, comply with any request from the Department or the MCA to obtain sea surface samples of oil and to arrange for the subsequent analysis or facilitate the transportation to any location specified by the Department and/or the MCA.

E.3 Number of Samples to be Obtained

The OPEP must state that three samples of oil from the sea surface will be obtained if it is appropriate and deemed safe to do so. The samples must be retained for the following purposes:

- Analysis specified by the Department or MCA;
- Evidential purposes (if required);
- Responsible Persons or Operators of Oil Handling Facilities own purposes.

The Department/MCA will advise what actions should be taken with regard to any samples obtained.

Appendix F – Dispersants Use and Approval

F.1 Regulatory Regime

The regulatory regime covering the use of oil dispersants in relation to oil and gas activities is described in The Regulation of Oil Spill Treatment Products in the UK (https://www.gov.uk/guidance/oil-and-gas-offshore-emergency-response-legislation). Approval of products for use in the UK is administered by the Marine Management Organisation (MMO) and a list of approved products can be found at:

https://www.gov.uk/government/publications/approved-oil-spill-treatment-products

With the exception of the internal and controlled waters of Scotland, Wales and Northern Ireland, the Department is the controlling authority for the use of dispersants. The strategy for the use of such products is considered as part of the review and approval process for OPEPs.

Once the OPEP is approved, all dispersants detailed within the OPEP can be used subject to the Responsible Person or Operator of the Oil Handling Facility seeking advice from the Department prior to the use of those dispersants (with the exceptions stated in F4 and F5 below). This commitment must be detailed within the OPEP.

F.2 Decision Making Process

All OPEPs must include the decision making process to be used for determining whether the use of dispersants is the appropriate response in a particular situation i.e. the use will significantly reduce the impact of an oil pollution incident and result in the least environmental harm. It is recommended that a checklist is developed and used as part of this process. The process should ensure that rapid decisions for dispersant use can be made and recorded and that those decisions are justifiable. It is for the Responsible Person or Operator of the Oil Handling Facility to determine the process that they will use; guidance is available from a number of sources including the Energy Institute's Operational Guidelines, the International Tanker Owners Pollution Federation and the International Maritime Organisation.

The Responsible Person or Operator of the Oil Handling Facility must ensure that persons with responsibility for authorising dispersant use as well as those personnel involved in the practical application of dispersant have received suitable training and are deemed competent.

F.3 Request for Advice

As a minimum requirement following a pollution event, where the Responsible Person or Operator of the Oil Handling Facility intends to use dispersant as part of their response, they

must contact the Department to discuss their intentions and to seek advice regarding the appropriateness of the response under the prevailing circumstances.

The outcome of the decision making process described above must be presented to the Department at this stage together with the information given in Table F.1.

The Department will contact the relevant Environmental Advisers (MS, MMO, NRW or NIEA) to seek their comments before providing the advice, which will be provided by telephone in the first instance, followed by a confirmation email.

F.4 Standing Approval

The Department may grant a waiver from the requirement to seek advice in the form of a 'Standing Approval'. This will only be granted for the use of in-field resources, within an agreed area that is not considered to be environmentally sensitive. The Standing Approval process takes into account the appropriateness of the response i.e. that the dispersant use will be likely to reduce the impact of oil pollution and result in least harm to the environment, together with the potential for the oil to be dispersible.

Where Standing Approval is sought, this must be identified in the OPEP submission sheet. If Standing Approval is granted, this will be stated in the approval letter. Standing Approval will be granted, provided the OPEP includes the following:

- Identification of environmentally sensitive areas in which dispersant use would not be appropriate and confirmation that dispersant will not be used in these areas;
- A demonstration, with reference to the modelling outputs and environmental and socio-economic sensitivities data included in the OPEP, that a release of oil is likely to significantly impact:
- Birds, marine mammals, or other flora and fauna at the water surface;
- Shorelines, structures and facilities;
- Confirmation that an assessment which includes laboratory dispersibility tests has been carried out on oil samples;
- A requirement that, where practicable, (i.e. taking safety issues into account), a suitable bottle test of a sample of oil will be carried out. Note, suitable sampling and testing kits must be available for this purpose;
- A requirement for a test spray from either a vessel or aircraft to be carried out with a maximum of 500 litres dispersant;
- Details of the criteria to be used for determining whether the test spray has been effective; and
- A requirement for regular monitoring of the effectiveness of any further in-field dispersant.

Any failure to adequately provide the above information will result in a non-approval issue. Failure to resolve the non-approval issue will result in the Standing Approval not being granted. Where Standing Approval has not been granted the Responsible Person or Operator of the Oil Handling Facility must update the OPEP accordingly and request advice from the Department prior to applying any dispersant.

The MCA and relevant environmental advisory bodies are consulted on all OPEPs, and would therefore have an opportunity to comment on proposed Standing Approvals as part of the OPEP approval process. Taking account of these comments the Department may deem it inappropriate to grant a Standing Approval and in this case the owner of the OPEP will notified of the Department's decision.

If the Responsible Person or Operator of the Oil Handling Facility intends to use dispersant not covered by a Standing Approval they must contact the Department to obtain advice, prior to using that dispersant.

F.5. Dispersant Use where Prior Approval is Required

Irrespective of the MMO approval stated in F1, the use of dispersant under the following circumstances requires additional approval from the Department:

- in, or within 1 nm of, waters of 20 metres depth or less;
- beneath the surface of the sea; or
- if the oil spill treatment product is not being used in accordance with any MMO product approval, or the conditions of that approval.

In these circumstances following an oil pollution incident Prior Approval must be obtained before any dispersant is used. The Department will contact the relevant Environmental Advisers (MS, MMO, NRW or NIEA) to seek their comments before making a determination regarding approval. The Department will notify the Responsible Person or Operator of the Oil Handling Facility of their decision by telephone, followed by a confirmation email.

If seeking Prior Approval, the details in Table F.1 must be provided and any further details required by the Department at the time the request for approval is submitted.

F.6 Dispersant Use to Protect Life or the Installation

If the use of dispersant is deemed necessary to protect human life or to protect the integrity of the installation, no prior approval or advice is required. The OPEP should include a statement to this effect and should confirm that the Department will be notified as soon as possible using the forms in Table F.2.

F.7 Record Keeping

All use of dispersant must be logged and the information retained. This information must be made available to the Department on request. Details of the information to be retained are highlighted in Table F.2 below and must be included in the OPEP. Records must be kept for 5 years from the date of use.

F.8 Dispersant Stocks

Dispersant stocks stored in the manufacturer's original unopened and undamaged packaging must be tested for efficacy within 10 years of the date of manufacture, and at a maximum of five yearly intervals thereafter.

All other dispersant stocks must be tested for efficacy within five years of the date of manufacture, and at a maximum of five yearly intervals thereafter.

F.9 Contacting the Department

The OPEP must specify the arrangements for contacting the Department to request advice. Initial requests should be made by telephone to the on-call Offshore Inspector on 0330 135 0010. This is the 24/7 call handling service operated by the Met Office and callers must request to be connected to the BEIS on-call Offshore Inspector.

Relevant contact email addresses will be advised by the on-call Offshore Inspector. All email communications must also be copied to: bst@beis.gov.uk

Table F.1 Information Required if Seeking Advice or Prior Approval on Dispersant Use

Installation / Oil Information	
Name and contact details for person requesting approval / advice	
Name of the Responsible Person or Operator of the Oil Handling Facility:	
Name / identifier of field(s) / installation(s):	
Location(s) – Quadrant(s) / block(s):	
Properties of oil to be treated with dispersant: Crude type Specific gravity Wax content Viscosity Asphaltene content Pour point	If full details are not available, please confirm and provide the relevant information as soon as possible
Dispersant Information	
Proposed dispersant type(s) and dispersant proprietary name(s):	
MMO approval status of all proposed dispersants to be used:	
Quantity / quantities of dispersant proposed for use:	
Proposed method(s) of application:	
Summary of how the efficacy of the proposed dispersant(s) on the oil to be treated has been demonstrated. This is to include the results of field bottle tests, test sprays etc.	
Proposed location(s) of dispersant application – Quadrants / blocks and boundaries of application area(s) using Lat/Long (degrees, minutes & seconds)	
Water depth (m) in proposed dispersant application area(s)	

Distance (km) and details of nearest shoreline to proposed area(s) of dispersant application	
Distance (km) and details of nearest median line to proposed area(s) of dispersant application	
Latest and forecast weather conditions in proposed area(s) of application. To include: Wind speed Wind direction Wave height	
Summary of the outputs from the decision making process utilised to determine why the proposed use of dispersants is an appropriate response to the oil pollution incident. This summary must demonstrate why the use of dispersant will significantly reduce the impact of the oil pollution incident and result in the least environmental harm (This may be relevant output of a NEBA/SIMA analysis or by any other equally effective means)	
Details of the environmental sensitivities in the proposed area(s) of dispersant application that may be impacted by the use of dispersant and the nature of these impacts	
Details of the environmental sensitivities in the area(s) that may be impacted by the oil pollution incident based on actual modelling if dispersant were not utilised.	

Table F.2 Information to be Recorded when Using Dispersant

Installation Information	
Name of Responsible Person or Operator of the Oil Handling Facility e.g. Well/Installation Operator:	
Name / identifier of field(s) / installation(s):	
Location(s) – Quadrant(s) / block(s):	
Dispersant Use Information	
Date:	
Dispersant proprietary name(s):	
Quantity / quantities used:	
Method(s) of application:	
Location(s) of application – Quadrant(s) / block(s):	
Prevailing weather conditions at time of use: Wind speed Wind direction Wave height	
Reason for use	
Was approval or advice obtained prior to use?	
Comments on effectiveness of treatment:	
Other relevant observations / comments on use:	
Name and contact details for person reporting use:	
Date and time report was completed:	

Appendix G – Shoreline Response Planning

The potential for oil to beach must be included in all OPEPs using appropriate worst case oil spill modelling. Where modelling indicates the potential for oil to beach, the OPEP must confirm that appropriate response resources are capable of reaching prioritised locations in sufficient time to allow response measures to be implemented to minimise the impact of any oil pollution. In sensitive locations where the risk of shoreline impact is likely to occur before the arrival of resources from existing Tier 2 or 3 stockpiles, consideration should be given to the establishment of dedicated pre-positioned resources.

A Shoreline Protection Plan (SPP) must also be developed for all installations (including pipelines) operating in Blocks wholly or partly within 40 km of the coast and pipelines coming ashore which have a potential for released oil to beach. The OPEP should confirm that an SPP has been developed, but it should not be submitted with the OPEP unless specifically requested by the Department.

The OPEP arrangements for any installation (not pipelines) located within 40 km of the coast should also confirm that:

- an appropriate dispersant can be applied within 30 minutes of a pollution incident; and
- sufficient dispersant stocks are available to treat a minimum oil release of 25 tonnes;
- appropriate at sea and shoreline response resources can be available on scene in sufficient time to allow response measures to be implemented to minimise the impact of any oil pollution.

Pipeline operators should detail the arrangements they have in place to respond to an oil spill which occurs from the pipeline within 40 km of the coast. This should include confirmation that appropriate at sea and shoreline response resources can be available on scene in sufficient time to allow response measures to be implemented to minimise the impact of any oil pollution.

For both pipelines and installations, where the time taken to deploy appropriate shoreline protection response resources exceeds the minimum time predicted for oil to beach, the OPEP must provide a justification as to why these response arrangements are appropriate.

When constructing the SPP Responsible Persons or Operators of Oil Handling Facilities should consult with any relevant Local Authorities and statutory consultees to ensure that all aspects of the SPP, including shoreline protection priorities and clean up arrangements are fully considered.

The SPP should as a minimum contain:

- procedures for shoreline protection, response initiation, mobilisation and implementation, including resource mobilisation and deployment times;

- arrangements to integrate with local authorities and other incident responders including management of waste, informing relevant third parties, providing advice to the general public and media management. The SPP should also coordinate with the NCP;
- details of environmental sensitivities likely to be impacted as determined by oil spill modelling;
- location of any required pre-positioned resources; and
- relevant contact details for contracted response resources.

Appendix H – OCU Requirements

The SOSREP's role is to represent the over-riding interests of the State and to prevent or reduce pollution in the event of an incident where there is or may be a risk of significant pollution. The role does not extend to the clean-up of pollution; this remains with the Responsible Person or Operator of the Oil Handling Facility through their oil spill response arrangements, which are detailed in their OPEP.

The OCU is established by the SOSREP and its function is to monitor plans for control and prevention of pollution and to provide a forum for discussion of these, environmental impacts and the interests of other key parties, States and organisations, which may be affected by the incident. Normally the OCU will act to monitor and, where appropriate, advise the incident response team. The OCU is not a committee; the SOSREP is in charge and will resolve differences of opinion. The SOSREP will always have responsibility for all decisions taken.

H.1 OCU Interface Arrangements

The OPEP must clearly demonstrate how the OCU interfaces with the established emergency response processes and procedures of the Responsible Person or Operator of the Oil Handling Facility and ensure all communication routes are clearly identified. Diagrams/flow charts are an acceptable way of representing such arrangements. The OPEP should include the Department's OCU email address ocu@beis.gov.uk which should be used once the OCU has been established.

H.2 Roles and Responsibilities of Identified Positions

Should an OCU be established the Responsible Person or Operator of the Oil Handling Facility will be required to provide an Emergency Operations Manager, an Operator's Representative(s) and an Operator's Technical Representative. The roles and responsibilities of these personnel must be clearly detailed within the OPEP.

The **Emergency Operations Manager (EOM)** role is to provide the SOSREP and the OCU with situation reports and developments of the incident having direct contact with first line response resources. The EOM will also act as the communications link between SOSREP and those in command of the emergency response on scene. This person must have sufficient authority to make decisions on behalf of the company.

The Operator's Representative(s) role is to act with regards to the physical property and liability insurers, provide the strategic view of the Responsible Persons or Operators of the Oil Handling Facilities interests to the SOSREP. There is scope for additional representatives if more than one Responsible Person or Operator of an Oil Handling Facility is involved.

When a third party contractor such as a drilling company is involved it may also be necessary for a representative from this company to attend the OCU.

There may be circumstances when a representative of the Offshore Licensee will be required to attend the OCU.

The Operator's Technical Representative role is to provide specialist knowledge to the SOSREP on behalf of the Responsible Person or Operator of the Oil Handling Facility and this may include areas such as engineering, subsea, pipelines, wellheads etc. In addition, this role will maintain liaison with the SOSREP's Independent Technical Advisor.

H.3 OCU Room Requirements

The OPEP must specify the location of the OCU. In selecting a location for the OCU relevant Responsible Persons must ensure the room meets the following minimum requirements:

- There must be adequate provision to transfer information, material and persons between the ERC and OCU without undue delay;
- The room must be suitable to accommodate a minimum of 13 people;
- The room must contain a minimum of 6 operational telephones;
- Sufficient power sockets must be available;
- There must be sufficient space for wall boards and diagrams/charts; and
- The facility to provide a live log of actions from the ERC to OCU is optional and viewed as best practice.

Appendix I – Aerial Surveillance Requirements

Table I.1

Aerial Resource Response Time Requirements			
Oil Spill Verification	Oil Spill Quantification	Dispersant Test Spray	Large Scale Dispersant Application
Within 4 Hours*	Within 6 Hours*	Within 6 Hours*	Within 18 Hours*

* from time of mobilisation request.

Aerial surveillance must be on site within four hours of the Responsible Person or Operator of the Oil Handling Facility requesting mobilisation. The use of aerial surveillance is vital to confirm the presence of pollution and/or to determine the extent of pollution allowing for a more detailed determination of size, appearance and trajectory to be made. This determination will facilitate the development of an appropriately targeted response strategy. Aerial surveillance will also provide an estimation of the quantity of oil visible on the sea surface and whether the oil is dispersing or emulsifying. Surveillance is also useful to identify any environmental sensitivities such as cetaceans or rafting seabirds.

As a minimum, the following should be available on the verification aircraft:

- Marine VHF radio;
- Digital still and video capabilities;
- Satellite telephone;
- Suitable navigation equipment including a Global Positioning System (GPS) to ensure the accurate display of search areas and dispersant spray patterns and to control the activities of other resources during counter-pollution operations; and
- Suitably trained and experienced personnel to ensure an adequate, continuous response capability.

As a minimum, the following should be available on the quantification aircraft:

- Marine and Aviation VHF radio;
- Digital still and video capabilities;
- Infrared imaging equipment;
- Ultra Violet imaging equipment;
- Satellite telephone;

- Suitable navigation equipment including a Global Positioning System (GPS) to ensure the accurate display of search areas and dispersant spray patterns and to control the activities of other resources during counter-pollution operations; and
- Suitably trained and experienced personnel to ensure an adequate, continuous response capability.

It should be noted that whilst crew change helicopters may provide details as to the size and location of pollution, they cannot be used for formal verification and quantification of pollution. Effective aerial surveillance requires the observers to be fully trained and competent in techniques for detecting and assessing hydrocarbons, both visually and through use of remote sensing technologies.

Appendix J – Definitions and Abbreviations

J.1 Definitions

Combined Operation	Operations undertaken on an installation working in conjunction with another installation(s) where the risks to the safety of persons or the environment are materially affected on any of the involved installations.
Connected Infrastructure	(a) any well or supplementary unit connected to an offshore installation; and (b) the following which are within the safety zone which applies to an offshore installation, namely— (i) any associated structure or device which is connected to the installation; (ii) any apparatus or works on, or affixed to, the main structure of the installation; and (iii) any pipeline apparatus or works attached to the installation.
Deep Water	Water depth of 300 metres or more
High Pressure High Temperature	HP/HT is defined as a well having an undisturbed bottom-hole temperature of >300 °F (149 °C), with a pore pressure of at least 0.8 psi/ft or an anticipated worst case surface pressure (including a safety factor) requiring pressure control equipment with a rating in excess of 10,000 psi (68.95 MPa).
Installation Operator	The person appointed to conduct any offshore oil and gas operations, but excluding the planning and execution of a well operation.
National Contingency Plan	The national plan for pollution emergencies prepared by the Secretary of State pursuant to Section 293(2)(za) of the Merchant Shipping Act 1995. It is available at www.gov.uk.
Non Production Installation	An offshore installation other than a production installation and includes mobile offshore drilling units, light well intervention vessels, flotels and jack-up accommodation/maintenance/light well intervention barges.
Offshore Installation	A stationary, fixed or mobile facility or a combination of facilities permanently inter-connected by bridges or other structures, which is used in offshore waters and for offshore oil and gas operations or in connection with such operations. Mobile offshore drilling units are considered to be Offshore Installations only when they are stationed in offshore waters for drilling, production or other activities associated with offshore oil and gas operations.

Offshore Licensee	As defined in the Offshore Petroleum Licensing (Offshore Safety Directive) Regulations 2015: a person who— (a) holds an offshore licence; or (b) held an offshore licence and has been required(c) to submit an abandonment programme (within the meaning of section 29 of the Petroleum Act 1998) to the Secretary of State in relation to activities carried out pursuant to the licence except where— (i) the programme has been approved by the Secretary of State; and (ii) that person is not subject to any obligations under the approved programme.
Offshore oil and gas operations	All activities associated with an offshore installation or connected infrastructure, including design, planning, construction, operation and decommissioning thereof, relating to exploration and production of oil or gas, but excluding conveyance of oil and gas from one coast to another.
Offshore Safety Directive	Directive 2013/30/EU of the European Parliament and of the Council on safety of offshore oil and gas operations and amending Directive 2004/35/EC(b).
Offshore waters	The territorial sea adjacent to the United Kingdom or any area designated under Section 1(7) of the Continental Shelf Act 1964(c).
Oil	Oil means petroleum in any form including crude oil, condensate, fuel oil, sludge, oil refuse and refined/synthetic products.
Oil Handling Facility	A facility which presents a risk of an oil pollution incident and includes, inter alia, an oil terminal, pipeline and any other facility handling oil but does not include an offshore installation or its connected infrastructure For the purposes of this Guidance any facility which is a pipeline or would be an Offshore Installation were it in Offshore Waters is considered to be an Oil Handling Facility.
Oil Pollution Emergency Plan	A contingency plan (other than the National Contingency Plan) setting out arrangements for responding to incidents which cause or may cause an oil pollution incident, with a view to preventing such pollution or reducing or minimising its effect.
Oil pollution incident	An occurrence which may result in a release of oil which poses or may pose a threat to the marine environment, or to the coastline or related interests of the United Kingdom and which requires emergency action to be taken.

Operator	(a) In relation to an Oil Handling Facility means a person having, for the time being, the management of such facility in the UK; (b) In relation to a production installation, means the “Installation Operator”; (c) In relation to the connected infrastructure of a production installation (i) for matters relating to a well, means the well operator (ii) in relation to all other matters means the “installation Operator”.
Owner	The person entitled to control the operation of a Non Production Installation.
Petroleum Operations Notice Number 1 (PON1)	The Petroleum Operation Notice which is used by Responsible Persons or Operators of Oil Handling Facilities, to notify relevant authorities of a release to sea of oil and/or offshore chemicals.
Production	Offshore extraction of oil and gas from the underground strata of the geographical area covered by a license including offshore processing of oil and gas and its conveyance through connected infrastructure.
Production Installation	An offshore installation used for the offshore extraction of oil and gas from the underground strata of the geographical area covered by a license, including offshore processing of oil and gas and its conveyance through connected infrastructure, this includes floating storage units.
Responsible Person	In relation to a Production Installation and its connected infrastructure, the operator of that installation is the Responsible Person. In relation to an NPI the Owner is the Responsible Person. The ‘Responsible Person’ is a legal term for an operator of a production installation, owner of a Non-Production Installation or a well operator. It is used in a similar manner to duty holder. It is not aimed at an individual.
Tier 3 Exercise	An exercise to test the interface between the SOSREP and the Responsible Person or Operator of the Oil Handling Facility, during a significant oil pollution incident. During the exercise the Responsible Person or Operator of the Oil Handling Facility, must demonstrate the implementation of an approved OPEP including the establishment of the OCU.
Subsurface	Area below the sea surface extending to and including the seabed only.
Tier levels	Oil pollution incidents must be classified according to the response levels they are most likely to require and NOT the volume of oil pollution, unless this is supported by a location specific risk assessment. For example, if a pollution incident requires the use of resources from a regional centre, this would be used to classify the

	necessary response level, irrespective of its size. If in doubt, a default principle of over-classification is more desirable than under-classification and escalation. For consistency with the NCP, the following Tier definitions apply: • Tier 1 Local (within the capability of the offshore installation); • Tier 2 Regional (beyond the capability of the offshore installation or requires additional contracted response); • Tier 3 National (requires the use of national resources).
Well operation	Well operation means The drilling of a well, including the recommencement of drilling after a well has been completed, suspended, or abandoned by plugging at the seabed; and Any operation in relation to a well during which there may be an accidental release of fluids from that well that could give rise to the risk of a major accident.
Well operator	In relation to a well or proposed well means the person appointed to conduct the planning and execution of well operations.

J.2 Abbreviations

API	American Petroleum Institute
BAOAC	Bonn Agreement Oil Appearance Code
BEIS	Department for Business, Energy and Industrial Strategy
Bonn	The Bonn Agreement (1969)
CGOC	Coastguard Operations Centre
EA	Environment Agency
EG	Environment Group
EOM	Emergency Operations Manager
EPC	Offshore Installations (Emergency Pollution Control) Regulations 2002
ERC	Emergency Response Centre
ERRV	Emergency Response and Rescue Vessel
FOI	Freedom of Information
FPSO	Floating, Production, Storage and Offloading vessel
FR	Financial Responsibility
HMCG	Her Majesty's Coastguard
HPHT	High Pressure High Temperature
IERP	Internal Emergency Response Plan

IMO	International Maritime Organization
ITOPF	International Tanker Owners Pollution Federation Limited
JNCC	Joint Nature Conservation Committee
MCA	Maritime and Coastguard Agency
MMO	Marine Management Organisation
MODU	Mobile Offshore Drilling Unit
MS	Marine Scotland
NAI	Non-approval Issue
NCP	National Contingency Plan
NE	Natural England
NEBA	Net Environmental Benefit Analysis
NIEA	Northern Ireland Environment Agency
NORBRIT	Norway and Britain Agreement
NPI	Non-Production Installation
NRW	Natural Resources Wales
OCR	The Offshore Chemicals Regulations 2002 (as amended)
OCU	Operations Control Unit
OIM	Offshore Installation Manager
OPEP	Oil Pollution Emergency Plan
OPPC Regs	The Offshore Petroleum Activities (Oil Pollution Prevention and Control) Regulations 2005 (as amended)
OPRC	International Convention on Oil Pollution Preparedness, Response and Co-operation.
OPRC Regulations	The Merchant Shipping (Oil Pollution Preparedness, Response and Co-operation Convention) Regulations 1998
OSD	Offshore Safety Directive
OMAR	Offshore Major Accident Regulator
PFEER	The Offshore Installations (Prevention of Fire and Explosion, and Emergency Response) Regulations 1995
PON	Petroleum Operations Notice
PPC Act	Pollution Prevention and Control Act 1999
SCR2015	The Offshore Installations (Offshore Safety Directive) (Safety Case etc.) Regulations 2015
SEPA	Scottish Environment Protection Agency
SIMA	Spill Impact Mitigation Assessment
SNCB	Statutory Nature Conservation Bodies
SOSREP	Secretary of State’s Representative
SOPEP	Shipboard Oil Pollution Emergency Plan

SPP	Shoreline Protection Plan
STOp Notice	Scientific, Technical and Operational Advice Note
UKCS	United Kingdom Continental Shelf

This publication is available from: www.gov.uk/beis

If you need a version of this document in a more accessible format, please email enquiries@beis.gov.uk. Please tell us what format you need. It will help us if you say what assistive technology you use.