



Department  
of Energy &  
Climate Change

# OFFSHORE OIL AND GAS IN THE UK

Update to the Government Response to an  
independent Review of the Regulatory Regime

December 2013

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# Contents

Background to Deepwater Horizon, the Maitland Review and the Government Response to the Maitland Review .....	4
Oil and Gas Regulatory Review Recommendations Update Table – December 2013 .....	6
List of Acronyms and Abbreviations .....	49

## Background to Deepwater Horizon, the Maitland Review and the Government Response to the Maitland Review

On 20 April 2010, the Deepwater Horizon drilling rig, working on the Macondo well in the Gulf of Mexico, exploded leading to the deaths of eleven personnel and the loss of 4.9 million barrels of oil to the sea. While the offshore UK oil and gas regime is regarded as one of the strongest in the world, the Government wanted to ensure that the UK considered the findings from the official Macondo reports and their relevance to the oil and gas industry in the UK.

The Government asked Geoffrey Maitland, Professor of Energy Engineering at Imperial College London, to chair an independent review panel to carry out this task. Mick Temple (retired BAA Development Director and currently a Member of the Faculty of Sustainability Leadership at the University of Cambridge) and Professor John Shepherd (Research Fellow in Earth Systems at the University of Southampton) provided their considerable expertise to the panel.

The independent panel published its report in December 2011. The report made recommendations around ten key themes: well planning and control, environmental protection, emergency response, learning from incidents and best practice, implementation assurance, competency and training of the workforce, workforce engagement, liability and insurance, regulator issues and technology development.

A Steering Group comprising membership from the Department of Energy and Climate Change (DECC), the Health and Safety Executive (HSE), the Maritime and Coastguard Agency (MCA) and the industry representative body Oil & Gas UK (OGUK) carefully considered the Maitland Review recommendations and in December 2012 the formal Government Response to the Maitland Review was published.

The Government Response confirmed that the majority of the recommendations in the Maitland Review had been implemented in full. However, at the time of publication, some of the work was on-going and where that was the case, work plans with appropriate dates for completion were put in place and detailed in the response.

The table on the following pages provides an update on the work that has been carried out since the formal Government Response was published. It does not reiterate the information contained in the Maitland Review nor that contained in the formal Government Response, but rather is designed to be read in conjunction with these documents.

<https://www.gov.uk/government/publications/offshore-oil-and-gas-in-the-uk-independent-review-of-the-regulatory-regime>

<https://www.gov.uk/government/publications/government-response-to-an-independent-review-of-the-regulatory-regime>

The work that has been done demonstrates the offshore UK oil and gas sector's commitment to continuous improvement – a key ethos in the Maitland Review.



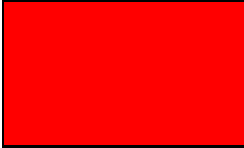
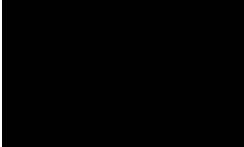
## Oil and Gas Regulatory Review Recommendations Update Table – December 2013

The table below provides an update on the work that has been carried out since the formal Government Response was published. It does not reiterate the information contained in the Maitland Review nor that contained in the formal Government Response, but rather is designed to be read in conjunction with these documents.

<https://www.gov.uk/government/publications/offshore-oil-and-gas-in-the-uk-independent-review-of-the-regulatory-regime>

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Key:

Colour	Definition
	Recommendation has been implemented in full or actions are on-going in the spirit of continuous improvements
	Recommendation has been implemented, but there is still some work to do. Actions and timescales are in place.
	Recommendation has been implemented, but there is still some substantial work to be done.
	After consideration, the Recommendation was not implemented and an alternative approach was adopted or the Recommendation has been overtaken by the publication of the EU Offshore Safety Directive

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: WELL PLANNING AND CONTROL</b>				
1.1.1	The Well Life Cycle Practices Forum (WLCPF) remains in place permanently	OGUK		<p>The WLCPF and its steering committee remain permanent. The forum is currently comprised of 9 workgroups and had a schedule of quarterly meetings in 2013. Additional work streams also exist under the forum, for example, the well status definitions work which aims to create common industry terminology for the status of wells in conjunction with DECC &amp; Common Data Access (CDA).</p> <p>In 2013 the Well Examination and Verification workgroups were not active having met the deliverables detailed below.</p> <ul style="list-style-type: none"> <li>• Relief Well Planning: Issue 2 published March 2013 <sup>1</sup>. This document will now enter the 3 year review cycle. In 2014 the workgroup will be examining the creation of guidance for determining unconstrained flow rates of wells.</li> <li>• Well examination: Review by industry of the 2011 examination guidelines established that an update is not required. This document will now enter the 3 year review cycle. The Well Examination workgroup has been resurrected and will be focusing on the transposition of wells related subject matter in the EU Offshore Safety Directive.</li> <li>• Verification: 2011 guidelines produced and will be reviewed for currency under Step Change in Safety.</li> </ul> <p>Following an update of the guidelines, the relief well planning workgroup also became inactive from March 2013.</p>

<sup>1</sup> All OGUK publications can be found on the OGUK website:  
<http://www.oilandgasuk.co.uk/publications/publications.cfm>

				<p>The High Pressure High Temperature (HPHT) workgroup having met its original deliverable (June 2013 response to Steve Walker's May 2012 letter entitled "HPHT Wells"<sup>2</sup> ) remains active.</p> <p>The group's aim is to create a HPHT specific guideline and examine the potential for further research into geo-mechanical modelling.</p>
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<sup>2</sup> Response provided current workgroup understanding on the following topics: Life of Development wells, Compaction, The use of exotic materials, Shock Loading, Elastomers, Isolation of Hod/Frigg formations and Education of tubular suppliers.



No.	Recommendation	Owner	Status	Update
<b>CHAPTER: WELL PLANNING AND CONTROL continued</b>				
1.1.2	Competent, authoritative representatives from industry and HSE meet regularly in the WLCPF to agree, review and continuously improve standards for good and best practice in well integrity and control for application in the UKCS.	OGUK		<ul style="list-style-type: none"> <li>• Members of the WLCPF comprise senior members of well operators and well management companies.</li> <li>• Representatives from DECC and the HSE are invited to, and have attended, forum meetings in 2013.</li> <li>• WLCPF chairs and OGUK met with the new head of the HSE energy division and relevant representatives on the 27th of November 2013.</li> <li>• Attending representatives are invited to raise any issues of interest for discussion.</li> <li>• Regulators are asked to present on topics of interest to the forum e.g. HSE organisational structure, rig intake and inspection.</li> <li>• Some WLCPF workgroups have HSE representatives in their membership.</li> <li>• HSE and DECC are consulted during the production or revision of guidelines</li> </ul>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: WELL PLANNING AND CONTROL continued</b>				
1.1.3	The standards take account of the Macondo blowout and encompass operating practices, adequacy and reliability of safety critical equipment (especially Blow Out Preventers (BOPs)), hardware maintenance and testing; personnel training and competency; human and organisational factors.	OGUK		<p>Further to the work detailed in the formal Government Response:</p> <ul style="list-style-type: none"> <li>• Issue 2 of the Relief Well Planning (Subsea, Platform and Jack Up) Guidelines was issued in March 2013</li> <li>• Issue 2 of Guidelines on Subsea BOP Systems set to be issued in draft for industry consultation before the end of the 2013.</li> <li>• Issue 2 of the Well Integrity Guidelines was issued in draft for industry consultation in Q4 2013.</li> <li>• Information on the deployment of the Oil Spill Prevention and Response Advisory Group (OSPRAG) capping device: The reports providing information on the mobilisation and deployment of the OSPRAG cap have now been released to all members of the WLCPF and the subscribers of the OSPRAG cap.</li> <li>• The Competency, Behaviours, Human and Organisational Factors work group has been actively collaborating with Step Change in Safety to further develop wells specific case studies. These will be included in the revision of Step Change’s “first steps” document and will align with a new self-assessment human factors tool. The case studies were launched at a networking event on August 21st. The final documents were published on 29th November 2013 and can be found on the following web link:</li> </ul> <p><a href="http://www.stepchangeinsafety.net/knowledgecentre/publications/publication.cfm/publicationid/108">http://www.stepchangeinsafety.net/knowledgecentre/publications/publication.cfm/publicationid/108</a></p>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: WELL PLANNING AND CONTROL continued</b>				
1.1.4	The standards are shared with international regulatory and industry partners and standard setting organisations.	OGUK		<ul style="list-style-type: none"> <li>• A survey was distributed in May 2013 to the WLCPF and other industry interfaces. The survey aimed to review the use and communication of the guidelines. This included a review of how useful, practical and readable the guidelines were in addition to how industry felt the guidelines had impacted safety in the UKCS.</li> <li>• The results were presented to the WLCPF and individual reports for each guideline have been produced and were communicated in Q4 to the relevant workgroups.</li> <li>• The well integrity workgroup held a successful workshop on the 6th of June to review issue 1 of the integrity guidelines and the proposals for issue 2. 44 delegates registered which included representatives from United Kingdom Onshore Operators Group (UKOOG), DECC, HSE, International Association of Drilling Contractors (IADC), Well Integrity Forum (WIF) and the International Association of Oil and Gas Producers (OGP). The working sessions provided a substantial amount of feedback on version 1 of the guidelines and the proposed content for version 2. The workgroup have addressed all feedback and where relevant, incorporated this into version 2. A draft of version 2 of the Well Life Cycle Integrity Guidelines will be released for industry comment in December 2013.</li> <li>• High level introductory packs have been developed for all current publications to aid the delivery of the guidelines throughout individual companies.</li> <li>• Where possible, the guidelines are actively presented at conferences and events. Examples include: IADC annual general meeting, 2013 Society of Petroleum Engineers (SPE) conference for well suspension and abandonment, 2013 Well Integrity Forum workshop-</li> </ul>

				<p>Norway, Energy Institute and Institute of Materials, Minerals and Mining (IOM3) dinner and the June 2013 Piper 25 conference.</p> <ul style="list-style-type: none"><li>• OGUK are looking at potentially launching training courses based around the WLCPF guidelines.</li></ul>
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No.	Recommendation	Owner	Status	Update
<b>CHAPTER: WELL PLANNING AND CONTROL continued</b>				
1.2.1	<p>The WLCPF should also promptly consider:</p> <ul style="list-style-type: none"> <li>- whether a change in well control standards is necessary to require at least two barriers to be in place (in addition to the BOP) when moving a well to an under-balanced situation with a producing zone open</li> </ul>	OGUK		<p>This recommendation was considered in the formal government response to the Maitland Review<sup>3</sup> and it was concluded that a change was not required. Please see the formal response for further details</p>
1.2.2	<p>The WLCPF should also promptly consider:</p> <ul style="list-style-type: none"> <li>- whether any change is necessary to require operators to give notice advising each time a situation is reached where the BOP plus one other barrier to a release is reached.</li> </ul>	OGUK		<p>This recommendation was considered in the formal government response to the Maitland Review<sup>4</sup> and it was concluded that a change in reporting requirements was not required. Please see the formal response for further details.</p>

<sup>3</sup> <https://www.gov.uk/government/publications/government-response-to-an-independent-review-of-the-regulatory-regime>

<sup>4</sup> <https://www.gov.uk/government/publications/government-response-to-an-independent-review-of-the-regulatory-regime>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: ENVIRONMENTAL PROTECTION</b>				
2.1	<p>Industry and DECC should continue to work together to develop and adopt improvements such as:</p> <ul style="list-style-type: none"> <li>- the “Environmental Assurance Plan” (EAP) concept, possibly using the Environmental Statement (ES) / Environmental Management System (EMS) as living tools to engender a goal-setting approach to environmental regulation aimed at continuous improvement, particularly in relation to low-frequency, high-impact incidents.</li> <li>- the identification and unified treatment of generic aspects of environmental assurance documents, to allow more effort to be devoted to other more specific or localised areas of potential impact and risk, through more extensive use of online systems, etc.</li> </ul>	OGUK, DECC		<p>The Offshore Safety Directive – in particular the requirement for a Major Hazard Report has overtaken the recommendation for an EAP.</p> <p><a href="http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:178:0066:0106:EN:PDF">http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:178:0066:0106:EN:PDF</a></p> <p>The Directive must be transposed into UK law by July 2015 and Government will be consulting with Industry and other Stakeholders during this process.</p> <p>The UK Oil Portal (UKOP) hosts environmental applications which allowed operators to apply for Directions under the Environmental Impact Assessment Regulations and Chemical Permits under the Offshore Chemicals Regulations. Operators were required to use paper based applications for approvals under other regulations for the same activity.</p> <p>The UKOP system has now been enhanced to streamline environmental applications, permitting and reporting requirements for offshore oil and gas activities. The enhancement, rolled-out on 7 October 2013, has transferred a number of paper based applications to e-business format, which has improved functionality for operators and has simplified procedures to improve efficiency for both industry and DECC.</p>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: ENVIRONMENTAL PROTECTION continued</b>				
2.2.1	The Panel also challenges the industry to take greater ownership of existing environmental regulatory requirements, including review of contractual arrangements for preparing and updating the relevant documents, to make them into tools that drive improvements in environmental assessment and protection.	OGUK, DECC		Please see the formal Government Response <sup>5</sup> . OGUK Environment Forum considered this recommendation and determined that existing contractual systems were fit for purpose, but that there might be some scope in the development of an EAP to improve the administrative requirements. However see 2.1 above – EAP proposal overtaken by the introduction of the Offshore Safety Directive.
2.2.2	The Panel recommends that the Regulator should continue to work with the industry to identify ways in which existing reporting requirements, especially regarding environmental compliance, might be simplified or rationalised, and that more might be done to demonstrate the need for, and consequent value of the detailed environmental assessments required of them, with a view to providing increased scope for innovative approaches to the improvement of environmental standards.	DECC, OGUK		As detailed in section 2.1, more environmental processes have been transferred to the UK Energy Portal.  Additional requirements have also been incorporated within the Environmental and Emissions Monitoring System (EEMS). EEMS is the mechanism through which oil companies can submit their environmental returns, which are used by DECC for government reporting requirements. The new requirements include applications to deposit materials on the seabed and for extended well tests and hydrocarbon chemical waste. EEMS was originally designed and operated by industry, but has now been taken over by DECC.

<sup>5</sup> <https://www.gov.uk/government/publications/government-response-to-an-independent-review-of-the-regulatory-regime>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: ENVIRONMENTAL PROTECTION continued</b>				
2.3	Guidance documents relating to offshore environmental impact assessment, enforcement, regulatory activities, etc. should be regularly reviewed and revised, initially in the light of changes in procedures arising from Macondo and subsequently taking account of any other relevant incidents, to reinforce the UKCS continuous improvement culture and to ensure that operators are fully aware of current requirements and environmental best practice expectations	DECC, OGUK		<p>The EIA guidance was updated in 2011: <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/193705/eiaguidancenote.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/193705/eiaguidancenote.pdf</a></p> <p>A schedule has been drawn up for the annual review of all guidance documents and FAQs are updated regularly.</p> <p>DECC is currently working on an update to the Habitats Regulations Guidance. This is expected to be completed and published on the website in Q1/2014.</p> <p>DECC has also placed consolidated OPEP guidance on the website <a href="https://www.gov.uk/oil-and-gas-offshore-emergency-response-legislation">https://www.gov.uk/oil-and-gas-offshore-emergency-response-legislation</a>.</p> <p>Work is now being carried out to fully update the OPEP guidance. A first draft has been prepared and is currently being circulated for internal comments. It is then intended to seek feedback from a representative group of operators. It is currently anticipated that the revised guidance will be placed on the website in Q1/2014.</p> <p>The Oil Spill Response Forum's OPEP sub-group have developed an OPEP framework document published through Oil &amp; Gas UK, which is available on the Oil &amp; Gas UK Extranet.</p>



No.	Recommendation	Owner	Status	Update
<b>CHAPTER: ENVIRONMENTAL PROTECTION continued</b>				
2.4	A selection of approved Environmental Statements (ESs) and Oil Pollution Emergency Plans (OPEPs), with a focus on high-risk wells, are periodically subjected to independent peer review by selected environmental experts (academics, independent consultants, members of the UK Environment Groups) to ensure that there can be continuing confidence that the identification and analysis of key issues is robust and evidence-grounded, incorporating the best scientific/ engineering practice, and that routine and unquestioned practice is challenged and lessons learned.	DECC		<p>DECC has contracted Genesis Oil and Gas Consultants (Genesis) to establish an annual review procedure to provide assurance that ESs and OPEPs are robust and fully meet the requirements of the relevant legislation.</p> <p>Genesis will manage the contract, but the reviews will be undertaken by an independent academic body. Tenders for the work were received from 4 academic bodies. Following assessment, the contract has been awarded to the University of Manchester (UoM). Work will commence in January 2014.</p> <p>In preparation, UoM have been sent information in relation to all approvals issued in 2013. UoM will randomly select a number of ESs and OPEPs for review. The only stipulation being that they must include an Environmental Statement for a high risk well. Findings will be reported annually and will be made available on the Government website.</p>
2.5.1	Where appropriate, DECC guidance for OPEPs should be updated to reflect the findings of OSPRAG's oil-spill modelling review.	OGUK, DECC		<p>Further to the modelling review meeting in July 2013, the OPEP modelling workgroup provided a response to DECC questions in relation to modelling capabilities for OPEPs.</p> <p>Due to the different requirements/ preferences of operators, DECC have confirmed the regulatory requirements with respect to model outputs. DECC have drafted an update to the modelling section in the OPEP guidance and the work group are currently considering that draft. The final version will be incorporated in the revised OPEP guidance due to be published in Q1/2014 (see 2.3 above).</p>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: ENVIRONMENTAL PROTECTION continued</b>				
2.5.2	Oil Spill Response Forum (OSRF) explores and stimulates improved oil-spill modelling techniques both at surface and subsea	OGUK		<p>A work programme was established to take this forward. The initial element of the work programme was a study to examine the existing models with respect to the three primary environments for which they are used. The work was undertaken by the Centre for Environment, Fisheries and Aquaculture Science (CEFAS) and Marine Scotland and sought to identify issues and weaknesses associated with each model and propose recommendations.</p> <p>The complexity of modelling issues means that Oil &amp; Gas UK cannot take this forward in isolation. The American Petroleum Institute (API) / Oil and Gas Producers Association (OGP), SINTEF (the largest independent research organisation in Scandinavia) and Marine Scotland are also considering this issue. The OGP Committee-managed Joint Industry projects (JIPs) (“Surveillance, Modelling and Tracking”) aim to complete their respective write-ups and publish results and recommendations by the end of December 2014.</p> <p>CEFAS report on Scoping the Use of Numerical Models in Deep Water Situations was submitted at the end of July. This report is currently under review by the OPEP modelling workgroup. The report focuses on modelling of deep subsea releases only. The results will be considered in combination with the outcomes from work being undertaken by the American Petroleum Institute (API) and OGP. As above, end of December 2014 - these timings have been taken from the OGP- International Petroleum Industry Conservation Association (IPIECA) Oil Spill Response JIP progress report October 2013.</p> <p>An oil spill modelling workshop focusing on the Faroe Shetland channel was held by Marine Scotland on the 18/19th September, the modelling workgroup is currently waiting for output proposals from the workshop to be consolidated by Marine Scotland.</p>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: ENVIRONMENTAL PROTECTION continued</b>				
2.6.1	Given the wide diversity of circumstances and environments in which capping devices might be called upon, the Panel recommends regular testing of their deployment in a range of scenarios, including during the course of relevant offshore National Contingency Plan (NCP) exercises.	OGUK, DECC		<p>As detailed in the formal government response <sup>6</sup>, it was considered that the UK industry has already demonstrated that it can deploy a capping device. However, it was agreed that there would be benefits in further enhancing the current deployment procedures. Subsea 7 &amp; Neptune, on behalf of the WLCPF, have executed studies detailing procedures for the mobilisation and deployment of the OSPRAG capping device.</p> <p>The study has also identified a suite of equipment which the workgroup recommends to be permanently available to ensure the timely mobilisation and deployment of the device.</p> <p>OGUK has communicated the findings of the OSPRAG capping device reports to all subscribers of the OSPRAG capping device and the WLCPF.</p> <p>Oil Spill Response Limited (OSRL) are responsible for storing and maintaining the OSPRAG capping device and the 4 additional devices developed for industry through the Subsea Well Response Project.</p>
2.6.2	Because such devices are not part of an offshore installation, a mechanism needs to be developed to bring them under the jurisdiction of the regulatory regime.	OGUK, DECC		The EU Offshore Safety Directive <sup>7</sup> requires a description of the independent verification schemes and an initial list of safety and environmental critical elements and their required performance to be submitted to the Competent Authority. Capping devices will be covered by this requirement.

<sup>6</sup> <https://www.gov.uk/government/publications/government-response-to-an-independent-review-of-the-regulatory-regime>

<sup>7</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:178:0066:0106:EN:PDF>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: ENVIRONMENTAL PROTECTION continued</b>				
2.6.3	<p>Given the need to ensure that any stand-by capping device will perform its key function, we recommend that the Regulators and Industry should agree requirements for:</p> <ul style="list-style-type: none"> <li>• Their regular maintenance</li> <li>• Appropriate testing of their ability to operate on demand</li> <li>• Appropriate training for their deployment and operation</li> <li>• Verification that these activities have been properly conducted.</li> </ul>	OGUK, DECC		<p>In order to provide reassurance that these checks are taking place, DECC has put a process in place whereby an annual update on tests, checks and inspections is sought from all capping device owners on the UKCS. This exercise is currently taking place and should be completed by the end of December 2013.</p>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: ENVIRONMENTAL PROTECTION continued</b>				
2.7.1            2.7.2	<p>The research and development relating to subsea application of dispersants should continue, to better understand the potential benefits of this approach for different water-depths and oil release flow-rates, compared to surface spraying or natural dispersion.</p> <p>The industry should define (through representative bodies such as the Oil Spill Response Forum) optimised dispersant systems and injection processes which give maximum benefits with low toxicity in accelerating dispersal and degradation to minimise the risks of oil reaching the shoreline or damaging bird and sea life.</p>	OGUK, DECC		<p>This work was initially going to be taken forward by the Oil Spill Response Forum Joint Industry Project (JIP).</p> <p>However, the JIP concept was found not to be an appropriate approach to deliver the work packages and these are now being taken forward by OGUK.</p> <p>Two studies have been completed: a review of subsea modelling (CEFAS) and a review of the extent and diversity of benthic habitats in the vicinity of deep-water drilling areas on the UKCS (Heriot Watt University). A third piece of work to review UK capabilities and to provide guidelines for environmental monitoring has been initiated and will complete in Q2/2014.</p>
2.7.3	The regulatory bodies should develop subsea application guidelines for dispersant and injection process selection.	DECC		See 2.7.1 and 2.7.2 above. In the meantime, DECC has amended its regulatory regime so that it is always necessary to have approval before subsea dispersants are utilised (see 2.7.4 below).
2.7.4	There is a requirement for speedy clarification of the regulatory position and relevant competent authorities in relation to dispersant use in near-shore and offshore areas.	DECC		<p>This recommendation was accepted and guidance published on the ONE Gov website:</p> <p><a href="https://www.gov.uk/oil-and-gas-offshore-emergency-response-legislation">https://www.gov.uk/oil-and-gas-offshore-emergency-response-legislation</a></p>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: EMERGENCY RESPONSE</b>				
3.1.1	The point at which command responsibility for the containment/clean-up operation should transfer from operator/contractor to the Secretary of State's Representative (SoSREP)/Government is clarified in the National Contingency Plan (NCP). The roles and responsibilities of the various organisations and personnel involved following such a transition should also be clarified.	MCA, DECC		<p>The Maritime and Coastguard Agency (MCA) is responsible for and is leading the review of the existing NCP. This work includes consideration of the Maitland Review recommendations 3.1, 3.2 and 3.3.</p> <p>Consultation on the first draft of a revised NCP closed on 12 November 2012.</p>
3.1.2	The NCP should clearly state who should assume overall command and control of all aspects of oil spill containment and response operations, including safety, regardless of location, should there be conflicting interests between cells.			<p>Following consideration of the responses to the consultation, the NCP Steering group agreed that a shorter more strategic document should be produced and this is being drafted by the Department for Transport (the MCA's parent Department). It was circulated to the Devolved Authorities and relevant Government Departments in early June 2013. Following this consultation, further amendments were made to the plan and a Steering Group Meeting was held on 15 October 2013 to discuss redrafted outcomes. A revised draft of the NCP is due to go out for further public consultation in January 2014.</p>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: EMERGENCY RESPONSE continued</b>				
3.2	The establishment of a communication function with authoritative and unambiguous responsibility to brief media and Government Ministers in the event of an incident of national significance	MCA, DECC		Although the NCP Review has not yet been completed, a Press Protocol has been established and will be included in the new plan. In relation to briefing on oil and gas issues, DECC will lead.
3.3.1	The MCA instigates a training programme for all potential members of the Marine Response Centre (MRC) and DECC maintains its training commitment for the Operations Control Unit (OCU). Particular attention should be paid to the numbers of support staff required to ensure that sufficient resilience is in place to maintain a qualified presence during a protracted incident.			<p>The MCA training programme for MRC activity is in place and was exercised in November 2013. An additional Salvage Control Unit/MRC/Local Resilience Fora exercise is under development for March 2014.</p> <p>DECC continues to maintain its training commitment – seven sessions have been carried out in 2013, with further training planned for 2014. This will include a session designed to ensure that OCU Administrative Support staff are aware of the roles and responsibilities of all external members of the OCU – i.e. the MCA Counter Pollution and Salvage Officer, the Joint Nature Conservation Committee, Marine Scotland and Oil Spill Response Ltd.</p>
3.3.2	The MCA training programme for local authority personnel should continue, thus ensuring a mechanism is in place to ensure non-statutory authorities have capability to conduct clean-up on the shore.			Local Authority training has continued with 9 courses planned for the second half of the Financial Year 13/14

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: EMERGENCY RESPONSE continued</b>				
3.4.1	<p>The panel considers that only through more frequent testing of the full range of response cells which would be mobilised in the event of a major incident can the requisite experience be gained by the key individuals involved. It does not consider that the present frequency is sufficient to ensure this, and therefore recommends that:</p> <ul style="list-style-type: none"> <li>• The frequency of the NCP exercises should be increased to at least every three years to ensure a high level of response preparedness by all parties.</li> <li>• A programme of smaller scale exercises should be initiated by the MCA in a similar manner to those conducted by DECC and the OCU, to aid the development of the MRC, to test the communications within the cell and its integration with Shoreline Response Centres, Environment Groups and the Maritime Rescue Co-ordination Centres (MRCC).</li> </ul>	MCA, DECC		<p>Although the NCP Review has not yet been completed, it has been agreed that the NCP National Exercise in relation to offshore installations will now be carried out every 3 years.</p> <p>A planning team has been established comprising of DECC, MCA, OGUK and BHP as the operator. The team has met on a number of occasions. The exercise (Exercise Dragon) is scheduled to take place over the period 10th-11th September 2014.</p> <p>MCA have undertaken a number of smaller scale NCP exercises – an exercise was carried out in the South West in Feb/March 2013. Further exercises are planned as noted in 3.3.1 and 3.3.2 above. The MCA also tested the MRC at a SoSRep OCU exercise on the 13th November.</p>



No.	Recommendation	Owner	Status	Update
<b>CHAPTER: EMERGENCY RESPONSE continued</b>				
3.4.2	The Panel also suggests that the frequency of the DECC OCU exercises with operators should reflect the risk particular installations pose to the environment	DECC		The next round of SoSRep exercises have commenced (programme in place up to 2016). Selection of operators now dovetails with DECC's inspection strategy and the risk particular installations pose to the environment. Following the reduction of the exercise time frame for Operator/SOSREP exercises to every three years, the Department is committed to exercising members of the Inspectorate and the OCU teams on a rolling programme almost every month for the foreseeable future.
3.4.3	The current requirement of Tier 2/3 response contractors is to provide evidence to DECC every five years of their ability to respond and deploy mechanical equipment including aerial surveillance and spraying capability. The Panel recommend the frequency of the response demonstration is increased to align with the NCP exercises.	DECC		Although the NCP Review has not yet been completed, it has been agreed that the NCP National Exercise in relation to offshore installations will now be carried out every 3 years. Discussions have commenced regarding the next exercise (Exercise Dragon), which will be held in September 2014. It is also intended that evidence of ability to deploy will be aligned with future National Exercises - this aspect has been discussed at the Exercise Dragon planning meetings and will be progressed accordingly. See 3.4.1.

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: LEARNING FROM INCIDENTS AND BEST PRACTICE</b>				
4.1	Installation operators and licensees should review their safety and environmental management systems to ensure they take sufficient account of ambiguous or uncertain signals of process abnormality and their scope to have a compounding effect in critical aspects of major hazard risk control. The signals should be treated as indicators that an operation may be unstable or unsafe and prompt the necessary action to ensure that risk is kept under control.	OGUK		<p>The 2008/09 one-day training programme on asset integrity and process safety issues was updated and it has been available on demand on a permanent basis since Spring 2013.</p> <p>Step Change has developed a specific workforce flyer aimed at all offshore workers to help them understand what major accidents hazards are and how to prevent them becoming actual incidents. Over 8,000 copies were distributed in 2012.</p> <p>Further copies of the awareness tools continue to be sent offshore. This has been combined with engagement packs containing short videos and presentation material supporting long term sustainability.</p>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: LEARNING FROM INCIDENTS AND BEST PRACTICE continued</b>				
4.2.1	<p>The industry should agree principles to ensure concerns about proprietary information and legal exposure do not prevent rapid sharing amongst operators of lessons which could help mitigate the risk of a serious incident.</p> <p>Regulators should use existing powers and influence to help ensure learning is shared on a timely basis.</p>	OGUK		<p>An industry graduate was recruited for a six month period (September 2012 – February 2013) to work in the Step Change team. Their role was to work with industry and regulators to support improved learning from the hydrocarbon release database. This work also involved discussions with the Norwegian oil and gas sector so that lessons can be learned and shared for mutual benefit.</p> <p>This project has completed its first phase. Limited progress was made due to resource constraints with external stakeholders. A follow-on project has now started focused on redeveloping the Hydrocarbon Release Frequency (HCRF) database. This will be combined with a sharing of learning target for hydrocarbon releases (HCR) moving forward.</p> <p>Step Change in Safety’s Asset Integrity Steering Group announced in June 2013 that the focus will now turn to sharing of both good practice and identified lessons in the area of unplanned hydrocarbon releases. The industry target “to share lessons from ALL reportable releases” through existing framework of Step Change in Safety’s Safety Alert and Data Information Exchange (SADIE)</p> <p>Work continues with the Health and Safety Executive to find opportunities to improve reporting and recording of HCRs via their database.</p>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: LEARNING FROM INCIDENTS AND BEST PRACTICE continued</b>				
4.2.2	<p>The industry, under the auspices of Oil &amp; Gas UK (OGUK), should develop and implement proposals to:</p> <ul style="list-style-type: none"> <li>• measure the performance and effectiveness of industry arrangements for the timely (days-weeks rather than months-years) sharing and learning from incidents and near-misses,</li> <li>• demonstrate that best practice is being identified and spread in an effective and transparent way and on an on-going basis,</li> <li>• routinely review industry performance to identify and resolve any issues that could hinder company to company sharing, learning and best practice implementation,</li> <li>• secure a more strategically coordinated approach for the gathering and dissemination of lessons from incidents and standards of good/best practice within the UK regime and internationally.</li> </ul>	OGUK		<ul style="list-style-type: none"> <li>• The WLPCF continue to review the currency of their guidelines. The review schedule is as defined in table 2 of the Maitland response <sup>8</sup>.</li> <li>• The HPHT workgroup are now discussing the creation of detailed HPHT specific guidelines. Following a gap analysis of existing industry documentation, the workgroup will assess the feasibility and need for a HPHT guideline. A timeline will then be constructed as appropriate.</li> <li>• WLCPF members continue to be invited to share learning from safety incidents at forum meetings.</li> <li>• Workgroups creating or revising guidelines continue to welcome any relevant learning from well control incidents. Additionally, well control incidents can trigger a review of guidelines ahead of their established review date.</li> <li>• National reporting of offshore incidents and the sharing of major incident information are requirements of the Offshore Safety Directive which aims to ensure that Member States are able to learn from each other's experiences internationally as well as within the EU.</li> </ul>

<sup>8</sup> <https://www.gov.uk/government/publications/government-response-to-an-independent-review-of-the-regulatory-regime>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: LEARNING FROM INCIDENTS AND BEST PRACTICE continued</b>				
4.2.3	Regulators should increase their level of scrutiny and monitoring of how companies learn from incidents and share experience rapidly, and take action to secure improvements, including the use of formal enforcement measures.	HSE, DECC		<p>The first meeting of the Senior Oversight Board took place on the 29th July 2013 and the discussion included the principles for an effective offshore regulatory regime.</p> <p>As detailed in the formal government response<sup>9</sup> the current enforcement powers of both DECC and HSE allow each regulator to take enforcement action should an individual operator fail to learn from an incident. DECC and HSE do not have powers to use formal enforcement action to require individual operators and companies to share learning across industry.</p> <p>However, national reporting of offshore incidents and the sharing of major incident information are requirements of the Offshore Safety Directive which aims to ensure that Member States are able to learn from each other's experiences internationally as well as within the EU.</p> <p>In addition, the Senior Oversight Board is to focus on the issue of learning from incidents at one of their quarterly meetings in the first half of 2014. It is intended that this will include consideration of the effectiveness of the current DECC Environmental and HSE Safety Alert Systems.</p> <p><a href="https://www.gov.uk/oil-and-gas-environmental-alerts-and-incident-reporting">https://www.gov.uk/oil-and-gas-environmental-alerts-and-incident-reporting</a></p> <p><a href="http://www.hse.gov.uk/safetybulletins/recentbulletins.htm">http://www.hse.gov.uk/safetybulletins/recentbulletins.htm</a></p>

<sup>9</sup> <https://www.gov.uk/government/publications/government-response-to-an-independent-review-of-the-regulatory-regime>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: LEARNING FROM INCIDENTS AND BEST PRACTICE continued</b>				
4.2.4	HSE should review and strengthen the guidance in its Loss of Containment manual, which emphasises the legal requirements under the Management of Health and Safety at Work Regulations to investigate the causes of accidents/incidents, learn appropriate lessons and implement appropriate remedial action and changes to future practice.	HSE		Manual revised and available on the HSE website.  <a href="http://www.hse.gov.uk/offshore/loss-of-containment-manual-2012.pdf">http://www.hse.gov.uk/offshore/loss-of-containment-manual-2012.pdf</a>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: IMPLEMENTATION ASSURANCE</b>				
5.1	OGUK develop within six months (or as soon as possible thereafter) industry guidelines of best practice for implementation assurance, and that these are used by the regulators in their ongoing scrutiny of management control systems for prevention of, or dealing with, major incidents.	OGUK, HSE, DECC		<p>This is fully embedded in ‘Joined-up Thinking’ a series of simple, high quality engagement packs aimed at supporting a sustained knowledge transfer. The packs have been widely adopted across industry with positive feedback coming from all levels and are available on the following link</p> <p><a href="http://www.joinedup-thinking.co.uk/">http://www.joinedup-thinking.co.uk/</a></p> <p>The development of industry guidelines and sharing of information is also being addressed by the requirements of the EU Offshore Safety Directive <sup>10</sup>.</p> <p>In addition, the European Union Offshore Oil and Gas Authorities Group (EUOAG)<sup>11</sup> is working on this issue, with two of their key aims being:</p> <ul style="list-style-type: none"> <li>• Facilitation of relevant information exchange concerning occurrence, causes and responses to major accidents and high-potential near-misses; and</li> <li>• Sharing intelligence on industry practices and standards and to promote - where appropriate - guidelines on best practice.</li> </ul>

<sup>10</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:178:0066:0106:EN:PDF>

<sup>11</sup> <http://euoag.jrc.ec.europa.eu/>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: COMPETENCY AND TRAINING OF WORKFORCE</b>				
6.1.1	The regulators work with the industry (through Oil & Gas UK) to develop clear competency guidelines for different offshore job functions and develop appropriate audit processes to ensure their effective implementation.	OGUK, IADC		<p>IADC's Accreditation and Credentialing Division have been working on a project to update and expand on their existing Knowledge, Skills and Abilities (KSA). The KSA project is nearing completion and an online database allowing users to access general specific-purpose KSAs is scheduled to go "live" by the end of January 2014. This database will allow users to generate KSAs for more than 70 specific rig based positions that will identify unique characteristics required for different rig types and equipment and different operating environments. The database, once launched, will be available on the IADC website at no charge to users.</p> <p>In addition, KSAs are being defined for well servicing positions and the company man.</p> <p>IADC is also launching the Well Control Institute (WCI) in response to the need for and recommendation of a globally accepted, single well control training standard. The standard will, in part, be based upon the recommendations of the Oil and Gas Producers' Wells Experts Committee (OGP WEC). The first deliverable for the new organisation is to revise the well control training and assessment requirements to align with 5 levels of training and delivery of a standardised, controlled assessment of the learner's knowledge and skills. Appropriate Crew Resources Management (CRM) courses will be developed and incorporated into the various levels of training once the institute is functional.</p> <p>The drilling courses will be brought online first, with the well servicing courses realigned to the new standard at a later date.</p>



No.	Recommendation	Owner	Status	Update
<b>CHAPTER: COMPETENCY AND TRAINING OF WORKFORCE continued</b>				
6.1.2	Operators of drilling installations ensure that emergency exercises cover realistic worst case major accident hazard scenarios, including events in which control of a well is lost and a blowout develops.	OGUK, IADC		As detailed in the formal government response <sup>12</sup> , emergency exercises as detailed in the recommendation were already in place.
6.1.3	The WLCPF undertakes research to learn from practices used in other high hazard industries for training and exercising crews for emergency scenarios and applies any resultant learning in standards and guidelines for UKCS best training practice.	OGUK, IADC		<p>This work is progressing with 4 new well related case studies being delivered as part of an update of 'First Steps'. The human factors in each oil and gas case study are being compared to a case study from another industry. The document will show what procedures and training have been developed by other industries in response to the human factor.</p> <p>The competency, behaviours and human factors workgroup under the WLCPF have been actively collaborating with Step Change in Safety to further develop wells specific case studies. These will be included in the revision of Step Change's "first steps" document and will align with a new self-assessment human factors tool. The case studies were launched at a networking event on August 21st. The final documents were published in November 2013 and can be found on the following web link:</p> <p><a href="http://www.stepchangeinsafety.net/knowledgecentre/publications/publication.cfm/publicationid/108">http://www.stepchangeinsafety.net/knowledgecentre/publications/publication.cfm/publicationid/108</a></p>

<sup>12</sup> <https://www.gov.uk/government/publications/government-response-to-an-independent-review-of-the-regulatory-regime>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: COMPETENCY AND TRAINING OF WORKFORCE continued</b>				
6.1.4	The WLCPPF examines, and periodically reviews, standards of training and certification for personnel involved in drilling operations. The standards should be revised as necessary to ensure a common approach in the UK basin and should apply to all personnel involved in a drilling operation, including those provided by third-party companies.	OGUK. IADC		<p>OGP proposed a single body for UKCS well control training. The International Well Control Forum (IWCF) and the provider of WellCAP (IADC) created a joint working group to assess how they could meet this proposal. IADC is now implementing the recommendations that were jointly agreed by both IWCF and IADC through the creation of a dedicated Well Control Institute (WCI) to develop a single global standard with independent governance. A project manager has been contracted to facilitate this work and the WCI is scheduled to begin operation in early 2014 and be fully functional by mid-2014.</p> <p>IADC are amending the toolkit and will notify currently accredited WellCAP training providers of pending changes in the curriculum and assessment procedure. The approved curriculum and curriculum cross-reference tool will then be available on the IADC/Accreditation website and the WCI Web Site.</p>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: WORKFORCE ENGAGEMENT</b>				
7.1	Individual operators and industry organisations such as OGUK and the International Association of Drilling Contractors (IADC) continue to develop management systems and best practices for rig crew engagement which drive a continuously improving culture of safety and environmental protection within their workforce.	OGUK		<p>A practical guide, survey and toolkit were published in September 2012. The industry has reacted positively to the toolkit to date with over 5000 individuals having completed the workforce engagement survey.</p> <p>The first analysis of over 4000 responses has been completed with a secondly analysis of 8500 responses currently being undertaken (circa 50% of fixed, manned offshore installations). The current benchmarks have proven to be a robust measure of industry wide performance with regard to engagement in safety.</p>
7.2.1	<p>Operating companies take steps to ensure that safety representatives:</p> <ul style="list-style-type: none"> <li>• remain freely and fairly elected and candidates are committed and capable to undertake the requirements of the role;</li> <li>• are provided with appropriate access to training over and above the statutory minimum requirements to develop competence in the identification of major risk hazards and communication skills, in addition to occupational safety matters;</li> <li>• are appropriately involved in the preparation and maintenance of safety cases,</li> </ul>	OGUK		<p>OPITO (Offshore Petroleum Industry Training Organisation) have delivered the new additional standard training for elected safety representatives. Work will now continue with all stakeholders to support a successful implementation.</p> <p>Uptake from industry has been very positive with courses typically being over-subscribed and wait-listed. Delegate feedback has on the whole been very encouraging.</p>

	<ul style="list-style-type: none"><li>• are encouraged to exercise their powers to report process safety concerns, inspect installations and investigate incidents, as part of their normal duties and without any fear of reprimand.</li></ul>			
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No.	Recommendation	Owner	Status	Update
<b>CHAPTER: WORKFORCE ENGAGEMENT continued</b>				
7.2.2	The Panel also recommends that operating companies expand the scope of existing, non-statutory workforce involvement in environmental roles to include offshore environmental protection issues, particularly the development, maintenance and implementation of OPEPs.	OGUK		<p>The E-Reps Forum was established in 2012. The first e-Reps Forum was held on the 21st November 2012 with the second taking place on the 9th October 2013.</p> <p>Results of the one-to-one interviews with operators, initiated by OGUK, indicate that operators will continue with individual approaches to workforce involvement.</p> <p>This issue will also be considered as part of the transposition of the EU Offshore Safety Directive, which requires that workers' representatives are consulted at the relevant stages in the preparation of the Major Hazards Report.</p>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: LIABILITY AND INSURANCE ISSUES</b>				
8.1	The Panel strongly recommends that expert, independent third party verification by an insurance expert of both the estimated costs and the ability to pay, including suitability of the insurance cover to meet them, should be submitted to DECC prior to consent being given to drill a well.	DECC, OGUK		As detailed in the formal government response <sup>13</sup> , it has been decided, after careful consideration, not to include third party verification of estimated costs.  DECC and OGUK published Financial Responsibility Guidance/Guidelines in December 2013.  <a href="https://www.gov.uk/oil-and-gas-legislation-on-emissions-and-releases">https://www.gov.uk/oil-and-gas-legislation-on-emissions-and-releases</a>  <a href="http://www.oilandgasuk.co.uk/publications/viewpub.cfm?frmPubID=463">http://www.oilandgasuk.co.uk/publications/viewpub.cfm?frmPubID=463</a>  Evidence of Insurance/indemnity cover is now required before Oil Pollution Emergency Plans are approved for all exploration and appraisal wells.
8.2.1	The Indemnity and Insurance Review Group (IIRG) should conclude their findings with urgency and that DECC should ensure that these inform new procedures and guidelines, which should also include a requirement for independent verification that insurance/indemnity cover is sufficient to meet third party costs.			
8.2.2	The Panel also recommends that third party costs for high-risk deep-water wells should be revised upwards. Despite the availability of caps, the costs should cover a 90 day release, which would reflect the typical time required to drill a relief well and so plug the original well at source.	DECC, OGUK		This recommendation has not been taken forward, please see formal Government Response for further details <sup>14</sup> .

<sup>13</sup> <https://www.gov.uk/government/publications/government-response-to-an-independent-review-of-the-regulatory-regime>

<sup>14</sup> <https://www.gov.uk/government/publications/government-response-to-an-independent-review-of-the-regulatory-regime>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: LIABILITY AND INSURANCE ISSUES continued</b>				
8.3	DECC should discuss the issue of damage to the ecosystem/biodiversity with industry (OGUK) with a view to introducing provision to cover this aspect. The Panel recognises that quantifying these costs can be challenging and suggest that the provision might take the form of a charge in the event of an incident (essentially a fine or payment of ‘damages’) to provide a further incentive to avoid any release of oil during Exploration and Production operations. Such damages should be used to fund long-term remedial work required to restore the area to its original environmental condition.	OGUK, DECC		<p>The EU Offshore Safety Directive now addresses the issue of such damage<sup>15</sup> and the EC is currently preparing a series of reports into financial security instruments, claims for compensation and wider issues of liability. These reports will be accompanied by proposals which the UK will wish to consider together with other Member States.</p> <p>DECC have opened discussions with Defra in relation to amendment of the Environmental Damage Regulations to meet the requirements of the Directive.</p>
8.4	Liability and insurance issues should be taken forward as a matter of urgency by OGUK and a clear claims and compensation procedure adopted by all operators in the UKCS, taking into account the evaluation that is to be carried out of the Gulf Coast Claims Facility once all claims in relation to Macondo have been paid out.	OGUK		OGUK have started work on claims and compensation guidance and draft guidance is expected to be completed by the end of Q1 2014.

<sup>15</sup> Article 39 of the EU Offshore Safety Directive: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:178:0066:0106:EN:PDF>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: REGULATOR ISSUES</b>				
9.1	<p>The regulatory bodies or, where appropriate, their parent Departments, develop strategies to ensure that each authority is in a position to recruit and retain inspectors and managers of the right number, quality, experience and range of specialities. The strategies should also consider issues around age profile plans for career progression through both technical and managerial routes and commit to an ongoing programme to market-test remuneration rates amongst relevant, specialist staff.</p>	DECC, HSE		<p>HSE: New pay ranges were implemented from October 2012. A directed recruitment campaign took place in Spring/Summer 2013 and continuous recruitment for offshore specialist vacancies continues.</p> <p>DECC: A project considering current retention and recruitment issues for specialist staff has been undertaken. The 2013 Oil and Gas Specialist Pay Offer has created two new pay and grading structures, known as “job families” – one of which is for environmental specialist staff within the Offshore Oil and Gas Environment and Decommissioning Unit and the other for oil and gas specialist staff in the Licensing, Exploration and Development Unit. Recruitment is continuing to fill specialist vacancies.</p>
9.2.1	<p>More formal mechanisms should be established to ensure seamless, strategic and coordinated working between the regulatory authorities.</p> <p>The Panel’s preferred option is the creation of a joint “Competent Authority”, similar to that currently operating on the mainland.</p> <p>As a less satisfactory, but easier to implement, alternative, the new Memorandum of Understanding (MoU) recently</p>	DECC, HSE		<p>This recommendation has been overtaken by the EU Offshore Safety Directive<sup>16</sup>, which requires the creation of a Competent Authority for offshore activities and sets out detailed requirements. The implementation of this recommendation will be taken forward via the wider implementation package for the Directive by mid-2015.</p>

<sup>16</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:178:0066:0106:EN:PDF>



	agreed between HSE and DECC should be developed further in order to capture the key benefits of the “Competent Authority” model.			
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No.	Recommendation	Owner	Status	Update
<b>CHAPTER: REGULATOR ISSUES continued</b>				
9.2.4	<p>The MoU should form a binding agreement between HSE and DECC to operate in an integrated and coordinated manner and should provide for:</p> <ul style="list-style-type: none"> <li>• a 'Joint Regulatory Steering Board' comprising suitably senior officials from each regulator to meet at least annually to monitor and coordinate the operation of regulatory activity and report annually on actions taken to ensure continuous improvement of the regime,</li> <li>• specific mechanisms for ensuring coordinated and joint action and for sharing experience and best practice,</li> <li>• an assumption in favour of joint inspection wherever practical,</li> <li>• agreement on a shared risk-assessment tool to aid prioritisation of joint activity.</li> </ul>	DECC, HSE		<p>A Senior Oversight Board has been established comprising senior officials from DECC, HSE and MCA to provide assurance that the regulatory regime remains fit for purpose. The Board met twice in 2013 and a programme of meetings has been put in place for 2014.</p> <p>Annexes to the MoU have been agreed which outline the working arrangements between HSE and DECC for the undertaking of visits to offshore installations and onshore premises to regulate against the provisions of their separate regulations and jurisdictions.</p> <p>These working arrangements help to ensure that the HSE and DECC work in a collaborative and supportive way to enable each Regulator to deploy resources in a way that is efficient and minimises the burden for those who have duties under the two legislative regimes of health and safety and environment for the regulation of major accident hazards and environmental incidents. The Annexes, which are due to be published in December 2013, cover:</p> <ul style="list-style-type: none"> <li>• Joint Drilling Strategy,</li> <li>• Joint Inspection and Investigation,</li> <li>• Assessment and Review of Regulatory Submissions: <ul style="list-style-type: none"> <li>➤ well notifications,</li> <li>➤ pipelines,</li> <li>➤ permissioning of installations and approval of Field Development Plans and</li> <li>➤ decommissioning.</li> </ul> </li> <li>• Monitoring of upstream oil and gas Industry, activities and trends: <ul style="list-style-type: none"> <li>➤ Sharing statistics on Hydrocarbon release, and</li> </ul> </li> </ul>

				<ul style="list-style-type: none"><li>➤ sharing of incident data/enforcement activity of relevance to respective regulatory body,</li><li>• Disclosure of Information</li></ul>
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No.	Recommendation	Owner	Status	Update
<b>CHAPTER: REGULATOR ISSUES continued</b>				
9.2.5	A senior representative of the MCA should participate in the meetings of the Steering Board, and other existing Memoranda of Understanding between the three organisations should be reviewed and, where appropriate, strengthened.	DECC, HSE		<p>The inaugural meeting of the Senior Oversight Board was held on 29th July 2013. A further meeting was held on 5th November and a programme of 3-monthly meetings has now been set up. A Senior MCA Representative sits on the Board.</p> <p>As well as ensuring that the outstanding Maitland Review recommendations are fully implemented and that the offshore regulatory regime remains fit for purpose, the Oversight Board will also oversee the transposition of the EU Offshore Safety Directive, including the development of the Competent Authority.</p> <p>The MCA have also attended meetings of the Joint Co-ordinating Group which oversees the functioning of the MoU between HSE and DECC</p>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: THE EUROPEAN DIMENSION</b>				
	Particular care should be taken to ensure that any future changes at an EU level neither dilute the fundamental strengths of the UK system or undermine the authority of the relevant regulatory bodies within it nor, through the mechanism and process of their introduction, frustrate or delay the potential improvements highlighted elsewhere in this report.	DECC, HSE		<p>The European Offshore Safety Directive<sup>17</sup> was published on 28 June 2013 and came into force 20 days later. It is largely based on the existing UK Regime. The Directive must be transposed into UK law by 19 July 2015.</p> <p>The introduction of the Directive has not impacted on the desire of all parties to take forward the improvements detailed in the Maitland Review as demonstrated both in the formal Government Response and in this update.</p>

<sup>17</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:178:0066:0106:EN:PDF>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: TECHNOLOGY DEVELOPMENT</b>				
11.1.1	<p>The industry, through OGUK, IADC and other industry organisation, should work with the operating and service companies to:</p> <ul style="list-style-type: none"> <li>• identify potential technology solutions to lower the risks of deepwater drilling, to monitor compliance, to improve and aid implementation of best drilling practice, oil spill remediation and clean-up, with particular emphasis on the conditions and challenges of operating in the North Sea;</li> <li>• invest in R&amp;D and bring new devices, tools and methodologies to market rapidly as a key part of future risk management of these operations.</li> </ul>	OGUK		<ul style="list-style-type: none"> <li>• As part of the UK Oil and Gas Business and Government action plan, Oil &amp; Gas UK has a dedicated resource to develop the UK technology strategy. The strategy will be published in March 2014.</li> <li>• This initiative will be run in conjunction with the Department for Business Innovation and Skills (BIS) and PILOT. ITF (Industry Technology Facilitator) and other relevant industry bodies will also be consulted.</li> <li>• The strategy aims to ensure that technology (development and application) plays a major role in enhancing the future of the North Sea</li> </ul>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: TECHNOLOGY DEVELOPMENT continued</b>				
11.1.2	<p>The Regulators should take a proactive approach to new technology to guide and encourage the industry to develop and implement new technology addressing offshore drilling safety and environmental concerns. Examples of initiatives they might take are:</p> <ul style="list-style-type: none"> <li>• the Joint Competent Authority or Joint Steering Board to have a panel of technical expert(s) to identify and monitor new technology developments with significant offshore safety and environmental benefits.</li> <li>• The Regulators to pro-actively encourage industry take-up, deployment and incorporation into guidelines and standards where appropriate.</li> </ul>	DECC, HSE		Support continuing as detailed in the formal government response. <sup>18</sup>

<sup>18</sup> <https://www.gov.uk/government/publications/government-response-to-an-independent-review-of-the-regulatory-regime>

No.	Recommendation	Owner	Status	Update
<b>CHAPTER: TECHNOLOGY DEVELOPMENT continued</b>				
11.1.3	The same group should also be charged with identifying key offshore safety and environmental technology gaps and through the regulators encourage the industry to address these.	DECC, HSE		Support continuing as detailed in the formal government response. <sup>19</sup>
11.1.4	The Government should make this a priority area for joint industry-government funding of projects through e.g. the Energy Technologies Institute (ETI), the Technology Strategy Board.			

<sup>19</sup> <https://www.gov.uk/government/publications/government-response-to-an-independent-review-of-the-regulatory-regime>



## List of Acronyms and Abbreviations

### A

API - American Petroleum Institute

### B

BHP – BHP Billiton

BIS – Department for Business, Innovation and Skills

BOPs - Blow Out Preventers

### C

CDA – Common Data Access

CEFAS - Centre for Environment, Fisheries and Aquaculture Science

CRM - Crew Resource Management

### D

DECC - The Department of Energy and Climate Change

### E

EAP - Environmental Assurance Plan

EEMS – Environmental and Emissions Monitoring System

EIA - Environmental Impact Assessment

ES - Environmental Statement

ETI - Energy Technologies Institute

EUOAG – European Union Offshore Oil and Gas Authorities Group

### G

Genesis - Genesis Oil and Gas Consultants

### H

HCR – HydroCarbon Release

HCRF - HydroCarbon Release Frequency

HPHT - High Pressure High Temperature

HSE - Health and Safety Executive

I  
IADC - International Association of Drilling Contractors  
IPIECA - International Petroleum Industry Environmental Conservation Association  
IOM3 – Institute of Materials, Minerals and Mining  
ITF - Industry Technology Facilitator  
IWCF - International Well Control Forum

J  
JIP – Joint Industry Project

K  
KSA - Knowledge, Skills and Abilities

M  
MCA - Maritime and Coastguard Agency  
MoU - Memorandum of Understanding  
MRC - Marine Response Centre

N  
NCP - National Contingency Plan

O  
OCU - Operations Control Unit  
OGP - International Association of Oil and Gas Producers  
OGP WEC – Oil and Gas Producers' Well Expert Committee  
OGUK - Oil & Gas UK  
UKOP – UK Oil Portal  
OPEP - Oil Pollution Emergency Plan  
OPITO - Offshore Petroleum Industry Training Organisation  
OSPRAG Oil Spill Prevention and Response Advisory Group  
OSRL Oil Spill Response Limited

P  
PILOT – Joint programme involving the Government and the UK oil and gas industry which aims to secure the long-term future of the UK continental shelf

## S

SADIE - Safety Alert and Data Information Exchange

SPE – Society of Petroleum Engineers

SOSREP - Secretary of State's Representative

## U

UKCS - United Kingdom Continental Shelf

UKOOG - United Kingdom Onshore Operators Group

UoM – University of Manchester

## W

WCI – Well Control Institute

WIF – Well Integrity Forum

WLCPF - Well Life Cycle Practices Forum

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