

OPPC PETS FAQs – March 2014

- 1) Q - What Start Date should I input into “general” page of application?
A – For all operations the start date should be at least 28 days after the date of submission of the application. For time limited operations (e.g. drilling) you must also enter an end date.

- 2) Q – Can I apply for a time-limited discharge operation within a production permit?
A – Yes. This can be achieved by including the dates of the duration of the operation within the circumstances of use field for the relevant system in Table 1 of the application.

- 3) Q –Do I need to upload documents to support my oil discharge application?
A – Yes. Documents must be uploaded in accordance with hint guidance given on the Attachments screen. Where documents are not provided, justification must be provided within the justification column. It is not acceptable to upload the entire word version of the original paper based OPPC application for the application to the PETS system.

- 4) Q – Do I need to submit Environmentally Critical Elements (ECE) information for a drilling operation?
A – Yes. The information uploaded should include details of the operators own approach to ECE and that of the drilling contractor.

- 5) Q – Am I required to provide ECE Identification and Management Strategy as supporting information for the application?
A – Yes. Section 1 of the SICs prescribes requirements for operation and maintenance. These conditions cover among other things planned inspection and maintenance, and best available techniques, which if used appropriately should prevent releases to sea or non-compliance with permits. The operators ECE strategy is fundamental to the fulfilment of this set of permit conditions and sets the scene for the operator’s vision.

- 6) Q – How much information should I put in Table 1 of the application?
A – Table 1 should contain brief details only. Any detail that may be necessary to explain what is entered in Table 1 is expected to be included in the uploaded documents.

- 7) Q – What Guidance is available to help me fill in my application?
A – Detailed guidance is available in Section 6 of the Guidance Notes on the Offshore Petroleum Activities (Oil Pollution Prevention and Control) Regulations 2005 located at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/246545/OPPC_Guidance_Notes.pdf
There is also hover guidance in the system itself identified by a blue letter “i”.

- 8) Q – What are the Standard Industry Conditions (SICs)?
A – The SICs form part of your final permit. They are the conditions that apply to all operations requiring a permit under OPPC. Consequently you must make yourselves familiar with their requirements. On making an application you will be asked to verify that you are aware of the SICs.

- 9) Q – What is the Justification column for in the Attached Documents Table?
A – This column should be used to justify why a relevant up load has not been made e.g. information is contained in other attached documents. It is not for the entering of application information e.g. the BAT justification.
- 10) Q – I can't access my application to make changes. What do I do?
A – Please contact the Offshore Inspectorate Team, offshore.inspectorate@decc.gsi.gov.uk, in the first instance. Your permissions to make changes will depend on the stage of the approval process that the application is has reached.
- 11) Q – The contact details in the MAT are incorrect. Who changes these?
A – It is your responsibility to update/change any contact details in the MAT.
- 12) Q – Will the transfer to the new system affect my Oil Discharge Permit EEMS returns?
A – Yes – the issue of a new Oil Discharge Permit under the PETS system means that EEMS returns will be made against that new Permit number from the date of coming into force (stated in Condition 1.1. of that Permit). However there may still be returns that will be required to be made against the previous Life Permit for all discharges that were made prior to this date.
- 13) Q – Are there any new EEMS returns for OPPC SATs?
A – No. The only change to OPPC returns is the ability to submit drainage discharges, as per the SICs, where sampling arrangements enable collection of representative samples. This is to be reported on the OPPC monthly return.
- 14) Q – Will the application for an Oil Discharge Permit under the SAT require any changes to the associated MAT?
A – Yes – you must include, in the associated Environmental Impact Assessment Justification, an assessment of the impact of the oil discharge on the environment. This is in addition to the assessment of the impact of oil releases.
- 15) Q – What details are required before an OPPC application can be accepted for review by an Environmental Inspector?
A -
MAT Checks:
- Confirm that the operator has provided details of a valid OPEP
 - Confirm that the operator has a valid EMS
 - Confirm that the operator's OPOL membership is up-to-date
 - Confirm that, within the EIA Justification document, there is evidence of the operator having carried out an Oil Impact Assessment or similar. Whereas this document has previously included impacts of accidental oil releases, it should now also include the impacts of planned operational oil discharges to be undertaken as described within the oil discharge permit SAT.

SAT Checks:

- Start date: The start date should not be less than 28 days after the date of submission (unless prior agreement is sought)
- Attachments: Sense check that all attachments are as described.
 - ◆ There **must** be a BAT assessment attachment
 - ◆ There **must** be a Treatment Process & Operation Description attachment
 - ◆ There **must** be an ECE Identification and Management Strategy attachment
- OR there **must** be text written in the Justification column outlining the reason for not providing the above
- OR 2 of these attachments may be combined into 1 document (e.g. BAT assessment and Treatment Process & Operation Description)

If you are experiencing technical issues with PETS, please contact the UK Oil Portal Team, ukop@decc.gsi.gov.uk. For any other queries please contact the Offshore Inspectorate at the address above, or alternatively on 01223 254138.