Dear Sir / Madam,

**OSPAR : Annual Reporting Relating to Chemical Goals**

The Department of Energy and Climate Change (DECC) is required to submit regular implementation reports to the OSPAR Offshore Industry Committee (OIC) in relation to the following Recommendations:

a) OSPAR Recommendation 2005/2 on Environmental Goals for the Discharge by the Offshore Industry of Chemicals that Are, or Contain Added Substances, Listed in the OSPAR 2004 List of Chemicals for Priority Action; and

b) OSPAR Recommendation 2006/3 on Environmental Goals for the Discharge by the Offshore Industry of Chemicals that Are, or Which Contain Substances Identified as Candidates for Substitution.

The reports are required to notify the progress made by Contracting Parties in reducing or phasing-out the discharges of offshore chemicals that are, or contain, substances that have been identified for priority action or identified as candidates for substitution; to inform the ongoing discussion relating to the achievement of the goals set out in the Recommendations.

Operators are therefore requested to prepare an annual report relating to chemical use and discharge during production, work-over / intervention, drilling and pipeline operations during 2015, using the Excel Annual Reporting spreadsheets, and to return their completed reports to emt@decc.gsi.gov.uk by **29 February 2016**. Copies of the spreadsheets can be downloaded from the website, currently located at:  
In addition to completing the annual reporting spreadsheets, operators are also required to submit a Technical Justification Report (TJR) for all chemicals identified as Chemicals for Priority Action or Candidates for Substitution. Operators should complete the **Excel spreadsheet for the Technical Justification Report** for all Chemicals for Priority Action and Candidates for Substitution and return the completed spreadsheets to [emt@decc.gsi.gov.uk](mailto:emt@decc.gsi.gov.uk) by **29 February 2016**.

Operators are requested to append **all** reports on trials that have been undertaken by the operator, irrespective of whether those trials have been successful or not.

To assist with the reporting process, please read the Guidance relating to completion of the spreadsheets for the Annual Reporting and the Technical Justification Reports, which is appended to this letter.

Operators should note that some minor modifications have been made to the Annual Reporting spreadsheets and the Technical Justification Report spreadsheet. The purpose of the modifications is to assist with reporting to OSPAR in 2017 and will help ensure that Chemicals for Priority Action and Candidates for Substitution not used and/or discharged but included on a chemical permit are not incorrectly reported as replaced or removed. The modifications to the spreadsheets are covered in more detail in the guidance, which is appended to this letter.

If you have any queries or concerns in relation to the above, please contact your assigned Environmental Manager or email [emt@decc.gsi.gov.uk](mailto:emt@decc.gsi.gov.uk).

Yours sincerely

Mark Shields
Environmental Management Team

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OSPAR: Annual Reporting Relating to Chemical Goals

Guidance

Completion of Annual Reporting Spreadsheets

There are two Annual Reporting Spreadsheets, one for production (life) chemical permits (PRAs), and one for term chemical permits (PON15B/DRAs, PON15F/WIAs, PON15C/PLAs and PON15E/DCAs).

Each spreadsheet contains two worksheets, one for Chemicals for Priority Action or Candidates for Substitution that are no longer used or have been replaced during the period of the report; and the other for Chemicals for Priority Action or Candidates for Substitution that are still used and have not been removed or replaced. Both worksheets must be completed, if necessary recording a ‘Nil’ return.

1. Separate copies of the production (life) annual reporting spreadsheet must be completed for each installation that is the subject of a PRA.

2. Separate copies of the term chemical permit spreadsheet must be completed for:

   **All** drilling operations undertaken during the relevant reporting period and covered by a PON15B/DRA;

   **All** work-over / intervention operations undertaken during the relevant reporting period and covered by a PON15F/WIA;

   **All** pipeline works operations undertaken during the relevant reporting period and covered by a PON15C/PLA; and

   **All** decommissioning operations undertaken during the relevant reporting period and covered by a PON15E/DCA.

It is not necessary to list every term permit within each category; however, if a chemical is used for different categories of operation (e.g. drilling and work-over operations) it should be included in both relevant spreadsheets.

To enable DECC to build up a better picture of the use of Chemicals for Priority Action and Candidates for Substitution for each category of operation, where chemicals have been used for work-over / intervention or pipeline operations and included in a PRA, this should be clearly indicated in the ‘Comments’ column alongside the entry in the production (life) annual reporting spreadsheet.

All Chemicals for Priority Action or Candidates for Substitution, must be included in the returns, irrespective of whether there is ‘Continuous’ or ‘Batch’ use, or whether there is any discharge to the marine environment.

Please note the Department is now requesting confirmation if all Chemicals for Priority Action and Candidates for Substitution were used and/or discharged.
during 2015 to assist with reporting to OSPAR. The use and/or discharge section includes a drop down menu and should be completed for all Chemicals for Priority Action and Candidates for Substitution included on a chemical permit in 2015 and following the guidance under points 1 and 2 above.

Any trials that have been undertaken during the period of the report to identify alternatives (including process modifications to eliminate use or substitution with alternative chemicals) must also be included in the returns. Where trials have led to the removal or replacement of a chemical, this should be recorded in the worksheet relating to chemicals that have been removed or replaced; and where trials have not led to the removal or replacement of a chemical, this should be recorded in the worksheet relating to chemicals that have not been removed or replaced.

In addition to detailing trials information within the spreadsheet operators are also requested to append written reports on all trials that have been undertaken by the operator, irrespective of whether those trials have been successful or not.

To simplify completion of the returns, several fields have been allocated drop-down menus. If more than one option is relevant, this should be recorded in the ‘Comments’ column in the return.

The ‘chemical name’ should be recorded exactly as it appears within the relevant PON15/PRA/DRA/WIA/PLA/DCA. Please note, a ‘Chemical supplier’ column has been added to the spreadsheet and must also be completed to enable a cross-reference check to be made.

**Technical Justification Requirements**

Operators should note the Technical Justification Report (TJR) Excel Spreadsheet replaces the previous requirement for a separate ‘stand-alone’ document. The TJR spreadsheet must be provided to support the annual return, providing a technical justification for all Chemicals for Priority Action or Candidates for Substitution that covers all applications of those chemicals.

**Please note** the Department is now requesting a TJR on all Chemicals for Priority Action or Candidates for Substitution included on all chemical permits during 2015. Therefore if Chemicals for Priority Action or Candidates for Substitution were included on a chemical permit during 2015 then a TJR should be provided, even if that chemical was not used or discharged or was replaced or removed from a permit during 2015.

The Technical Justification Report spreadsheet submission date is **29th February 2015**. Once a TJR spreadsheet has been submitted for a product, the technical justification can be omitted from all future chemical permit applications, and replaced by a brief justification directly related to the risk assessment for the proposed use and/or discharge.
Completion of Technical Justification Report (TJR) Spreadsheet

There is one Technical Justification Report spreadsheet, which will cover all chemical permits (PRAs, PON15B/DRAs, PON15Fs/WIAs, PON15Cs/PLA and PON15E/DCAs) for an operator. The spreadsheet contains more than one worksheet (P1, P2, P3, etc.), and information relating to each Chemical for Priority Action and each Candidate for Substitution should be included on a separate worksheet within the TJR spreadsheet.

Operators must complete a TJR worksheet (P1, P2, P3, etc.) for each Chemical for Priority Action and each Candidate for Substitution included on a chemical permit during 2015.

To simplify completion of the returns, several fields have been allocated drop-down menus. If more than one option is relevant, this should be recorded in the ‘Other information’ row in the relevant section of the return.

To add additional worksheets to the TJR spreadsheet right click on the P1 worksheet tab, followed by selecting ‘Move or Copy’. In the box that appears scroll down and highlight ‘(move to end)’ and tick ‘Create a copy’ followed by ‘OK’. Following these instructions will generate a new worksheet containing all the functionality of the P1 worksheet.

The TJR should:

- identify the product;
- explain the functions and applications of the product and/or component;
- detail the reasons why it is considered necessary to continue to use and/or discharge the product and/or component and relate it to process requirements e.g. safety, efficacy, environmental benefits, legislative compliance benefits, cost considerations, etc.;
- provide a brief summary of any trials undertaken to reduce or eliminate use and/or discharge and the outcomes of those trials. A copy of a written report of the trial should be appended to the TJR; and

As indicated above, when you have submitted a TJR for a chemical that includes a proposed application detailed in a chemical permit application, it will no longer be necessary to replicate this information in the chemical permit application. However, it will be necessary to supplement the TJR if there are any changes in the information during the period of an annual report, and to update the TJR in the next annual return.

Completion and submission of the spreadsheets will be an annual requirement, and a reminder will be issued every year confirming the relevant submission date and pointing out the potential requirement to up-date the TJR.

Risk-based Justifications
Following submission of a TJR, it should be referenced in relevant chemical permit applications, and the justification included in the PON15/PRA/DRA/WIA/PLA/DCA should concentrate on the specific conditions of use and/or discharge detailed in the application to determine risk.

It should therefore concentrate on factors such as:

- the total quantity of the product and/or component that will be used and/or discharged;
- the fate of the product and/or component;
- the potential impact of the product and/or component in the receiving environment;
- the supporting modelled risk assessment (HQ v RQ, OA if appropriate); and
- any factors that would reduce the risk (e.g. dispersion, dilution, batch discharge, etc.).

The risk-based justification should represent a significant reduction in the application preparation workload, e.g. zero discharge chemicals will probably only require confirmation of the fate of the chemical and that the environmental impact would be negligible.

**New additions**

When a new chemical is included in a PON15/PRA/DRA/WIA/PLA/DCA that requires a justification, and there is no relevant TJR, the chemical permit application must include both a technical justification and a risk assessment. The technical justification can then be omitted in future applications once it has been included in a TJR.