



OEI Inspection Strategy

The Offshore Petroleum Regulator for Environment & Decommissioning (OPRED) is part of the Department for Business, Energy & Industrial Strategy (BEIS) and is responsible for developing the environmental regulatory framework for offshore oil and gas exploration and production, offshore gas unloading and storage and offshore carbon dioxide storage on the UK Continental Shelf (UKCS), and for administering and ensuring compliance with the regulatory regime.

1. Offshore Environmental Inspectorate

A core function of the OPRED's Offshore Environmental Inspectorate (OEI) is to inspect oil and gas installations to ensure compliance with relevant Regulation and permit conditions. It is also to gain assurances that operations are undertaken with due consideration of environmental aspects and impacts and with effective controls to minimise the likelihood of releases to the environment.

The primary objectives of OEI inspections are to:

- Encourage operators and owners to work effectively to prevent environmental incidents associated with the loss of containment of oil and gas;
- Inspect offshore oil and gas installations to ensure compliance with the law; and
- Improve leadership, competence and workforce involvement by raising awareness of the offshore environmental regime.

2. Inspection Priorities

The OEI inspection prioritisation uses a risk based approach for production and non-production installations, taking into account the potential for environmental emissions, environmental sensitivities and potential impact, aspects of the proposed operations and operator / owner performance history as well as mandatory inspection requirements set out in European environmental regulations. Inspectors are allocated a portfolio of operators and owners and each Inspector will plan their inspections accordingly, ensuring that inspections of installations that fall within the highest risk category are given priority.

Inspections take different forms from pre-spud inspection of MODU's, to inspection before or just after first oil for new installations, to routine planned inspections during normal operations and decommissioning activities.

3. MODU Inspections

OPRED aims to inspect all operational MODU's working in the UKCS during each financial year and both owners and well operators will be advised in their intervention plans where possible.



Pre-Spud MODU Inspections:

All new wells in the UKCS must go through an approval process within the Department in which they are risk assessed according to criteria including well type, location, hydrocarbon type and flow rates, potential environmental sensitivities and well operator / MODU owner history. If a well operation has been identified as being in a higher risk category, it then falls into the pre-spud operational review and pre-spud inspection process. It is expected that all new MODU's or operations to be undertaken by well operators or MODU owner's new to the UKCS will go through the pre-spud process prior to commencement of the proposed well operations.

4. Production Installation Inspections

Production installations priorities are determined by a risk based approach as well as any mandatory inspection requirements under The Offshore Combustion Installations (Pollution Prevention and Control) Regulations 2013. Which production installations will be inspected will depend upon the resource available, the installation priority as determined by the inspection risk assessment and inspector knowledge.

Factors which influence the priority of an inspection include, but are not limited to, the following:

- Hydrocarbon type produced (oil, gas, condensate)
- Quantity of permitted discharges/emissions (oil, chemicals, combustion emissions)
- Location of installation
- Age of installation
- Time period since last inspection
- PON1 and Non-Compliance frequency and severity
- Investigation and enforcement history

The Offshore Combustion Installations (Pollution Prevention and Control) Regulations 2013 inspections

Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions (integrated pollution prevention and control - IED) sets out an inspection period for installations falling under this Directive. The inspection period must not exceed one year for installations posing the highest environmental risks and three years for installations posing the lowest environmental risks. OPRED sets out its IED inspection plans on an annual basis for those installations having a permit issued under The Offshore Combustion Installations (Pollution Prevention and Control) Regulations 2013 which is located at:

<https://www.gov.uk/guidance/oil-and-gas-offshore-environmental-legislation#the-offshore-combustion-installations-pollution-prevention-and-control-regulations-2013>

These inspections would be incorporated as part of a planned installation inspection.



The Greenhouse Gas Emissions Trading Scheme Regulations 2012 (EU ETS) inspections

In order to comply with Commission guidance on EU ETS inspections both onshore and offshore inspections will be undertaken during each planning period. Onshore EU ETS inspections will be included in annual intervention plans.

5. Inspection Planning

Inspection priorities are determined on an annual basis and the information is used to identify inspection schedules for the forthcoming financial year. Planned inspections may be impacted by any unplanned inspection, investigation or enforcement activity and are subject to change. Other changes which may influence inspection frequency include:

- Commissioning of a new installation
- Change of operator / owner
- Significant changes to infrastructure or operations

Inspection plans will be provided to installation operators, well operators and NPI owners on an annual basis in accordance with the OSDR intervention planning framework. Competent Authority Intervention plans should be issued by December each year and cover Q1 of the following year (which will have previously been advised) and the forthcoming financial year.

Competent Authority Joint Inspections

Through discussions with HSE colleagues on dutyholder (installation operator / NPI owner) and well operator performance, inspections for a potential joint intervention may be identified.

These will typically be for:

- New installations;
- New dutyholder;
- New well operators at pre-spud; or
- where there are common areas of concern regarding dutyholder / well operator performance e.g. on SEMS, maintenance & verification, process, wells or integrity issues

Where there is a potential for joint inspection these should be considered during the OSDR intervention planning process and if a joint intervention is confirmed then HSE & OPRED inspectors must ensure a suitable inspection agenda is developed to maximise the benefit from the joint intervention.