



Requirements for Oil or Oily Mixture Discharges for Offshore Installations Engaged in Oil and Gas Operations on the UK Continental Shelf

Notice to all Owners, Ship Operators and Managers, Charterers, Masters and Officers of Merchant Ships, Shipbuilders, Port Authorities, Operators of Fixed and Floating Platforms and Drilling Rigs and Classification Societies.

This notice should be read with the Merchant Shipping (Prevention of Oil Pollution) Regulations 2019 and Offshore Petroleum Activities (Oil Pollution Prevention and Control) Regulation 2005 as amended

Summary

The purpose of this MGN is to provide further information with respect to the requirements for oil or oily mixture discharges for offshore installations engaged in oil and gas operations on the Continental Shelf.

1. Introduction

- 1.1 Appendix 5 of Annex I of MARPOL sets out in the form of a flow diagram, the regulatory regime for the discharge of oil and oily mixtures from offshore installations under MARPOL and national/regional regulations and national/regional regulations only.
- 1.2 “Offshore installation” means fixed or floating platform, including drilling rigs, floating production storage and offloading facilities used for the offshore production and storage of oil, and floating storage units used for the offshore storage of produced oil. The regulations apply to such installations engaged in the exploration, exploitation or associated offshore processing of sea bed mineral resources.

Note: Fixed or floating production platform means a platform from which sea-bed mineral resources are extracted from beneath the sea-bed by means of a well, or which is used for the conveyance of sea-bed mineral resources by means of a pipe, and which –

- (i) is fixed to the seabed by means of steel jackets, concrete footings or any other means, etc, or
- (ii) floats on the surface of the sea and is secured to the seabed by means of risers, anchors, or any other means.

It should also be noted that FPSOs and FSUs are to be in compliance with IMO Resolution MEPC.139(53) as amended.

- 1.3. This guidance clarifies the requirements for fixed or floating production platforms in accordance with Regulation 33(2) Merchant Shipping (Prevention of Oil Pollution) Regulation 2019.
- 1.4 It is recognised that the design and operation of fixed or floating production platforms does not readily allow the discharge of contaminated seawater/machinery space drainage (as regulated by the MSPOP Regulations 2019) to be split out from oil and oily mixtures discharged as a result of oil and gas processing activities (as regulated by The Offshore Petroleum Activities (Oil Pollution Prevention and Control) Regulations 2005 (OPPC Regulations)). It is also recognised that the vast majority of these platforms cannot propel themselves through water and do not have machinery or machinery space drainage associated with propulsion. Therefore, it has been decided to make the capability of propelling themselves through the water the deciding factor as to whether either the MSPOP Regulations 2019 or the OPPC Regulations, or both, shall apply.
- 1.5 Capability of propelling themselves through the water means platforms described in paragraph 1.4 at the time at which it is so engaged in the exploration, exploitation, or associated offshore processing of sea bed mineral resources, are capable of being propelled through water under its own power.

2. Requirements for discharge of oil and oily mixture

- 2.1 Fixed or floating production platforms operating on the UKCS which are capable of being propelled through water under their own power and are registered with either UK or foreign Flags must meet the requirements of both the Merchant Shipping (Prevention of Oil Pollution) Regulations 2019 and the OPPC Regulations where the discharge is from an offshore installation.
- 2.2 Fixed or floating production platforms on the UKCS which are not capable of being propelled through water under their own power and which are registered with either UK or foreign Flags must meet the requirement of the OPPC Regulations where the discharge is from these platforms.
- 2.3 Non-Flag Registered fixed or floating production platforms which operate on the UKCS and are capable of being propelled through water under their own power must meet the requirements of the Merchant Shipping (Prevention of Oil Pollution) Regulations 2019 and the OPPC Regulations requirements where the discharge is from these platforms.
- 2.4 Non-Flag Registered fixed or floating production platforms operating under the UKCS requirements and are not capable of propelling themselves through the water, shall meet the OPPC Regulations discharge requirements where the discharge is from these platforms.