



Department
of Energy &
Climate Change

Energy Group
Energy Development Unit
Offshore Environment and Decommissioning
Atholl House
86/88 Guild Street
Aberdeen
AB11 6AR

By Email

Tel +44 (0)1224 254110

www.gov.uk/decc
offshore.inspectorate@decc.gsi.gov.uk

Ref No: 13/0995

Dear Sir,

Thank you for your e-mail dated 25 July 2013 in which you requested the following information:-

"I am writing a dissertation and i am using your PON 1 data from 2007-2011. In the process of cross checking it with the companies required to submit environmental policies for those years i have a noticed a few discrepancies. I was just wondering if someone could clarify a few points for me, perhaps it is my lack of understanding or companies operating under different names.

Despite being recorded by the DECC as required to submit an environmental policy for all 5 years there seems to be no data for:

*ATP Oil and GAS UK
Energy resource technology (ERT) ltd
RWE Dea UK
Sterling resources Uk ltd*

*and very limited data for the following
GDF britain ltd and
GDF Suez e and p ltd*

the following companies who were required to submit environmental policies for four years of the period above also have no data:

*Endeavour international corporation uk
Serica energy Uk ltd
Silverstone energy ltd
Wintershall noordzee bv*

the following companies who were required to submit environmental policies for three years of the period above also have no data:



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*challenger minerals
encore petroleum plc
Genesis exploration and production ltd
nobile energy (europe) ltd*

These are the main queries i would like to raise but there are also a significant amount of companies who have very sporadic data, as in one chemical spill in a single year and then no data for the other four operational years. I assume this means they had a perfect record and did not release any quantity of either oil or chemical products into the environment for the other years?"

An email clarification received from you on Wednesday 21 August 2013 confirms that your request is actually referring to PON1 data:

"Yes lack of pon1 data, the companies have listed environmental statements with the decc which means they were active, I have also checked their production figures which confirm they were active. Yet there is not a single pon1 form submitted."

We consider that the information that you have requested constitutes environmental information for the purposes of the Environmental Information Regulations 2004 (EIRs). Accordingly, your request has been dealt with under the terms of the EIRs.

Under these regulations, you have the right to:

- Know whether we hold the information you have requested and;
- Be provided with that information (subject to any exceptions which may apply).

All the information that the Department holds on PON1 data for the period 2007-2011 is publicly available on the government website at:

<https://www.gov.uk/oil-and-gas-environmental-data#pon-1-data>

The PON1 data available on the website is a full and complete record of all PON1s submitted to the Department for that period. If the company is not listed, then they have not submitted a PON1 report of any release / discharge to the Department.

As you may be aware, operators are required under Regulation 11A(1) and (2) of The Offshore Petroleum Activities (Oil Pollution Prevention and Control) Regulations 2005 (OPPC) (as amended) and Regulation 15(1) and (1A) of the Offshore Chemicals Regulations 2002 (OCR) (as amended) to provide the Secretary of State with information of a release, discharge or other incident



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where there has been or may be a significant effect on the environment by means of pollution.

This is done using the Petroleum Operations Notice No.1 (PON1) form and submitted to the Offshore Environmental Inspectorate Unit of DECC to assess and review.

You have referenced both PON1 data and also 'Environmental Policies'. In an earlier request for clarification it was confirmed that the 'Environmental Policies' referred to are actually Environmental Management Systems Annual Public Statements.

All Environmental Management Systems Annual Public Statements are publically available on the government website at:

<https://www.gov.uk/oil-and-gas-ospar-ems-recommendation>

Appeals Procedure

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within 40 working days of the date of receipt of the response to your original letter and should be sent to the Information Rights Unit at

Information Rights Unit (DECC Shared Service)
Department for Business, Innovation & Skills
1 Victoria Street
London
SW1H 0ET
Email: foi@decc.gsi.gov.uk

Please remember to quote the reference number above in any future communications.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Yours sincerely

Offshore Environmental Inspectorate
Energy Development Unit