

**ENVIRONMENTAL ALERT
PROFORMA**

ALERT NUMBER: 003/2009

ISSUE DATE: 4 June 2009

INCIDENT DETAILS:

Reports of all inspections and investigations undertaken by the Offshore Environmental Inspectorate over the past 12 months have been reviewed. In addition the Environmental Management Team has reviewed aspects associated with the various regulatory applications that have been submitted to DECC.

This alert brings to your attention the following trends and issues that have been identified so that, if they are applicable to your operations, you can take corrective action and consequently improve environmental regulatory compliance; pollution prevention measures; and resource use (for both yourselves and DECC).

REVIEW FINDINGS:

Regulatory Applications:

- Regulatory applications have been submitted that are not accurate or specific to the installation or operation that is the subject of the application, and may not have been proof read or subject to a QA process. Examples include, but are not limited to, documents referring to a different installation / operation; resources detailed in the application do not reflect those available; and personnel involved in pollution response operations do not reflect the arrangements within the organisation.
- Regulatory applications written by contractor organisations or environmental consultants have not been reviewed by the operator responsible for the application which has resulted in applications being submitted that do not align with the operator's policies or practices, or adequately describe the intended operations.
- Regulatory applications have used generic data sources, some of them more than 10-15 years old, without taking account of updated information, for example information obtained during pre-operation survey work.

Regulatory Non-Compliance:

- Of the various terms and conditions included within environmental permits, regulatory compliance is often focused only on meeting minimum standards that have to be reported to DECC, e.g. confirming compliance with the 30 mg/l dispersed oil standard for produced water. Offshore inspections have identified many instances where other terms and conditions attached to permits are not being complied with. Personnel responsible for offshore permit implementation and compliance are often unaware of the full range of permit requirements. It is therefore essential that operators provide sufficient information, instruction and training to their staff to ensure that they are aware of the permit requirements to manage the operations in compliance with the regulations.

- Offshore inspections have identified non-compliance with permit terms and conditions and regulatory requirements that have not previously been audited, identified or addressed by the operator. In accordance with their Environmental Management System, operators are expected to have in place their own systems and procedures to audit activities to ensure that regulatory compliance is being achieved, and to take action if remedial measures are required.
- Pollution prevention and mitigation measures have not been implemented in accordance with the Oil Pollution Emergency Plan, or in accordance with commitments provided in other regulatory applications.
- Offshore and onshore staff have not completed the mandatory oil spill response training requirements, or undertaken mandatory exercises, and when questioned some staff have not been fully aware of incident response requirements. It is essential that staff are trained and capable of responding to environmental incidents.

Incident Investigations:

- Incident investigations on several drilling rigs have identified a number of instances where operators have failed to audit or review rig systems and contracting arrangements to ensure that equipment and procedures are in place and implemented to comply with regulatory requirements and commitments as detailed in permit applications.
- Incident investigation findings have included operations being undertaken where risk to the environment has not been considered; suitable procedures have not been in place; procedures have not reflected current practice; and staff have been unaware of the existing procedures on the installation or drilling rig.
- The primary root causes of environmental incidents have included: poor communication during shift changes; inadequate environmental risk assessment before operations; procedures not being followed or not in place; equipment failure; lack of staff familiarisation with proposed operations/installation equipment; lack of staff competency/training.

Further Information

Any queries relating to this alert should be addressed to:

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