



Regulating Offshore Oil and Gas Installations during the Coronavirus (Covid-19) Outbreak - Offshore site visits by verifiers to meet EU ETS obligations

In our communication of 8 April 2020, OPRED confirmed its' position that despite the demanding circumstances during the current Covid-19 pandemic, the requirement to comply with offshore environmental legal requirements remains with permit holders, operators, and owners of offshore installations. However, when considering our regulatory approach, we also committed to take a flexible and proportionate account of the risks and challenges arising from the pandemic.

Under the requirements of the EU ETS Accreditation and Verification Regulation (AVR), a site visit by a verifier is necessary; as a minimum; every three years. We are aware that there are a number of installations where a site visit is required this year and have been scheduled during 2020. However, in recognition of the duty of care operators have to their staff and contractors, especially during these unprecedented times, OPRED is prepared to consider a site waiver application at this time, provided it is supported by a robust justification to explain the additional risk to personnel or difficulties with pre-arranged visits proceeding. The justification must be supported by the appropriate EU-ETS AVR risk assessment from your selected verifier confirming the risk of misstatements or non-conformities being missed, is acceptable, and detailing what alternative means of verification are proposed to reduce these potential risks, including whether virtual site visits by the verifiers are proposed. Operators should discuss their particular circumstances with their allocated Environmental Manager prior to submission of a site visit waiver request via ETSWAP.