



Department for
Business, Energy
& Industrial Strategy

PETROLEUM OPERATIONS NOTICE 1 (PON1)

GUIDANCE FOR REPORTING OIL AND
OFFSHORE CHEMICAL RELEASES

SEPTEMBER 2021



Revision	Date	Comment
0	September 2021	First Issue



© Crown copyright 2021

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit nationalarchives.gov.uk/doc/open-government-licence/version/3 or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gsi.gov.uk.

Where we have identified any third-party copyright information you will need to obtain permission from the copyright holders concerned.

Any enquiries regarding this publication should be sent to us at: bst@beis.gov.uk

Contents

1. Introduction	4
2. Legislative Background	5
3. PON1 Reporting	6
3.1 Application of the PON1 Regime	6
3.2 Reporting Timeframes	6
3.3 PON1 Reporting Method	7
3.4 PON1 Reporting Responsibility	7
3.5 Required Information Regarding Owner/Operator/Permit Holder etc.	8
3.6 PON1 Reporting for Ongoing Releases	8
3.7 Permitted Discharge Notifications	9
3.8 Third-Party Oil Pollution identified During Offshore Oil and Gas Activities	9
4. PON1 Review, Pollution Response and Investigation	9
APPENDIX A: Reporting Flow Diagrams	10
APPENDIX B: Definition of Release and Discharge	12
APPENDIX C: Definitions of Oil and Offshore Chemicals	13
APPENDIX D: Quantification of Release Quantities	14
APPENDIX E: Reporting Subsea Emissions of Offshore Chemicals	15
APPENDIX F: Reporting Emissions from Drainage Systems	16
APPENDIX G: Reporting Emissions from Caissons	19
APPENDIX H: Reporting Emissions from NPIs and Vessels	20
APPENDIX I: Reporting of Oil Releases during Flaring Operations	21
APPENDIX J: Definitions	22

1. Introduction

This document is the Guidance on the provision of information in relation to releases to sea of oil or offshore chemicals during offshore oil and gas activities. This Guidance includes Directions under regulation 11A(2) of The Offshore Petroleum Activities (Oil Pollution Prevention and Control) Regulations 2005 (OPPC) and regulation 15(1A) of The Offshore Chemicals Regulations 2002 (OCR) as to the form and manner of reports issued by the Secretary of State.

Offshore oil and gas activities are those activities carried out at or from an offshore installation in relation to:

- The exploration for or exploitation of mineral resources
- Activities associated with gas storage, loading and unloading
- Conveyancing by pipeline
- The decommissioning of any offshore installation or pipeline
- The provision of accommodation on an offshore installation related to the above activities

An offshore installation is any structure maintained on station by any means for the purposes of oil and gas activities. This includes all fixed oil and gas production platforms, floating production or storage facilities, subsea oil and gas infrastructure (including all wells), oil and gas pipelines, Non-production Installations (NPI) and vessels (when undertaking oil and gas activity). Specific guidance on the application of this to NPIs and vessels is provided in Appendix H.

This means all exploration, production and decommissioning activity involving any offshore installation in the relevant area is considered to be an offshore oil and gas activity.

The requirements in this document are applicable to all offshore oil and gas activities conducted in the “relevant area” as defined in OPPC and OCR, which is the territorial sea adjacent to the UK (with the exception of Scottish and Welsh controlled waters) and any area designated under section 1(7) of the Continental Shelf Act 1964.

This means:

- For English and Northern Irish waters it applies from the Low Water Mark to the maximum extent of the UK Continental Shelf
- For Scottish waters it applies from 3 nautical miles from the Low Water Mark to the maximum extent of the UK Continental Shelf
- For Welsh waters it applies from 12 nautical miles from the Low Water Mark to the maximum extent of the UK Continental Shelf

This document supersedes the previous Petroleum Operations Notice 1 (PON1) Guidance which was issued by the Department of Energy & Climate Change and is effective from the date of publication.

2. Legislative Background

This Guidance articulates the Secretary of State's requirements for the provision of information in relation to all releases including Directions as to the form and manner in which this information is provided.

A release is the emission to sea of oil or offshore chemicals (other than by way of a discharge). A discharge is the intentional emission to sea of oil or offshore chemicals. For more details see Appendix B.

A PON1 is the method used to report all releases to sea of oil and offshore chemicals that occur during offshore oil and gas activities. Definitions of 'oil' and 'offshore chemical' are provided in Appendix C.

OPPC and OCR require the Permit Holder or, if there is no Permit Holder, the operator to provide details of the following:

- Any incident resulting in a discharge of oil/offshore chemicals save in accordance with the terms or conditions attached to a permit
- Any incident resulting in the use of offshore chemicals save in accordance with the terms or conditions attached to a permit
- Any incident resulting in a release
- Any other incident involving oil/offshore chemicals where there has been or may be any significant effect on the environment by means of pollution

OPPC and OCR also require that a person who releases or discharges oil or uses, discharges or releases an offshore chemical must provide the Secretary of State with such information as they may reasonably require for the purpose of performing their functions under the Regulations.

In addition to the requirements of the Regulations, the terms and conditions attached to Chemical Permits or Oil Discharge Permits require that the Permit Holders must report all releases of oil and/or offshore chemicals to the Department by means of a PON1 notification.

It is an offence to fail to supply information required to be supplied by OPPC and OCR and the terms and conditions attached to Chemical Permits or Oil Discharge Permits.

The Department may investigate any instance of the failure to provide required information in line with OPRED's Enforcement Policy. This may result in the imposition of a civil penalty or other enforcement action. Further details can be found within the OPRED Enforcement Policy.

A person guilty of an offence under the regulations shall, on summary conviction, be liable to a fine not exceeding the statutory maximum and, on conviction on indictment, to an unlimited fine.

Requirements regarding the provision of information to the Secretary of State relating to non-compliant discharges of oil and/or the non-compliant use or discharge of offshore chemicals can be found [here](#)

3. PON1 Reporting

3.1 Application of the PON1 Regime

A PON1 must be submitted following any release to sea of oil or offshore chemical during offshore oil and gas activities, regardless of quantity.

Flow diagrams depicting the reporting requirements for emissions of oil and offshore chemicals are included at Appendix A.

All PON1 submissions must take account of any relevant Guidance provided in the Appendices A – J of this document.

3.2 Reporting Timeframes

The timescale for the submission of a PON1 must be in accordance with the terms and conditions of the approved Chemical Permit or Oil Discharge Permit i.e. within six hours of becoming aware of the release. Where no permit is in force, the PON1 must be submitted without delay and the Department expects this will be within six hours.

Initial submission of the PON1 must not be delayed beyond six hours to allow the gathering of further information. The PON1 can be updated at any time if additional information becomes available.

All PON1 submissions must state the quantity of oil and/or offshore chemicals released. Appendix D must be used when determining the quantity of the release. If the quantity of the release cannot initially be determined an estimate must be provided and the PON1 submitted in accordance with the above timeframes.

The Department and HM Coastguard must also be notified by telephone without delay and within one hour of becoming aware of the release, where the release meets any of the following criteria:

- exceeds 1 tonne
- is within 40 kilometres of the coast
- exceeds any specific telephone reporting threshold detailed within a relevant OPEP, Chemical Permit or Oil Discharge Permit
- is the first report for an ongoing release (telephone notification to HM Coastguard only)

Contact telephone numbers for OPRED and HM Coastguard are in the relevant Oil Pollution Emergency Plan (OPEP).

The OPEP may also contain requirements to notify additional organisations about a PON1 reportable release. The OPEP details the circumstances in which such organisations must be notified of an oil release and the method by which the notification must be made. The same notification criteria must be applied in the event of a release of offshore chemicals.

3.3 PON1 Reporting Method

PON1s must be submitted using the UK Energy Portal. It is the responsibility of all Installation Operators, Well Operators, Pipeline Operators, NPI Owners and Permit Holders who may be required to submit a PON1 to ensure they have appropriate access to the UK Energy Portal.

UK Energy Portal accounts that enable the submission of PON1s can be requested by contacting ukop@ogauthority.co.uk

Should the UK Energy Portal be unavailable PON1s must be submitted by email using the PON1 Pro-forma available [here](#). The required distribution list is detailed on the PON1 pro-forma. Any PON1 reported by email in this manner must be subsequently reported via UK Energy Portal at the earliest opportunity.

3.4 PON1 Reporting Responsibility

Production Installation/Pipeline Operations (including Combined Operations between a Production Installation and a Non-Production Installation)

The Permit Holder is responsible for ensuring that the PON1 is submitted in accordance with the terms and conditions of the approved Chemical Permit or Oil Discharge Permit. If there is no Permit Holder the responsibility for ensuring the submission of the PON1 rests with the appointed Installation/Pipeline Operator.

Well Operations undertaken from a Non-Production Installation (including Combined Operations between two NPIs)

The Permit Holder is responsible for ensuring that the PON1 is submitted in accordance with the terms and conditions of the approved Chemical Permit or Oil Discharge Permit. If there is no Permit Holder the responsibility for ensuring the submission of the PON1 rests with the appointed Well Operator.

Vessel Operations (where the Vessel is an Offshore Installation as defined in Appendix H)

The Permit Holder is responsible for ensuring that the PON1 is submitted in accordance with the terms and conditions of the approved Chemical Permit or Oil Discharge Permit.

If there is no permit the Consent to Locate holder or the Responsible Person for the implementation of the approved OPEP must ensure the PON1 is submitted.

Remote Suspended Wells

The responsibility for PON1 submission rests with the Permit Holder. If there is no permit holder the appointed Well Operator has this responsibility. In the absence of a separately appointed Well Operator, this obligation rests with the Licensee.

In all the above cases the submission of the PON1 may be made by any person on behalf of the company responsible for the PON1 submission.

3.5 Required Information Regarding Owner/Operator/Permit Holder etc.

The PON1 must detail all companies involved in the oil and gas activities. Where applicable, details of the following must be provided:

- Production Installation Operator: This is the company appointed to operate the production installation*.
- Well Operator: This is the company appointed to undertake the well operations* and for the purposes of this Guidance includes the company responsible for the operation and maintenance of any well during production operations.
- NPI Owner: The company who controls the operation of the non-production installation, also known as the NPI duty holder.
- Permit Holder: The company holding the Chemical Permit and/or Oil Discharge Permit (where there is no Permit Holder, this section of the PON1 must detail the holder of the Consent to Locate if applicable).
- Pipeline Operator: The company who controls the day to day operation of the pipeline. This is the company holding the approved OPEP(s) for the pipeline.

* under regulations 5 and 6 of the Offshore Petroleum Licensing (Offshore Safety Directive) Regulations 2015

3.6 PON1 Reporting for Ongoing Releases

The Department considers any continuous or intermittent release from the same source to be “ongoing”. PON1s which detail ongoing releases must be updated on a 24-hourly basis unless otherwise agreed with the Department.

The PON1 notification form requires the submitter to state whether the ongoing release rate has “increased”, “decreased” or there has been “no change”. The reporter is given the option to add a justification for any change in release rate.

For continuous releases this refers to the rate of emission from the release point.

For intermittent releases this refers to the rate of emission from the release point during each intermittent release event. It does not refer to the number of intermittent release events.

If the release rate is unchanged or there has been no further release the reporter should select the “no change” option.

3.7 Permitted Discharge Notifications

The requirement to submit PON1 Permitted Discharge Notifications has been withdrawn. To reflect this withdrawal, the terms and conditions attached to permits issued under the OPDC regulations have been updated and amended non-compliance reporting requirements have been introduced. All requirements regarding the reporting of OPDC non-compliances can be found at [\[LINK\]](#).

3.8 Third-Party Oil Pollution identified During Offshore Oil and Gas Activities

Third-party oil pollution is considered to be marine pollution the source of which is not related to the activities of the reporting installation/vessel.

Following the observation of third-party oil pollution it is incumbent on relevant companies (as per Section 3.5) to investigate all potential sources of oil pollution from their operations before concluding the oil pollution is a third-party incident.

All third-party oil pollution incidents should be reported by telephone to HM Coastguard in accordance with their requirements.

Previously there was a requirement to report third-party oil pollution incidents as 'Known or Unknown Third-Party PON1s'. This requirement has been withdrawn.

The Department may liaise with HM Coastguard in relation to third-party oil pollution incidents reported during offshore oil and gas activities. Any reported third-party oil pollution incident subsequently identified to be a release or discharge arising from offshore oil and gas activities will be investigated by the Department.

4. PON1 Review, Pollution Response and Investigation

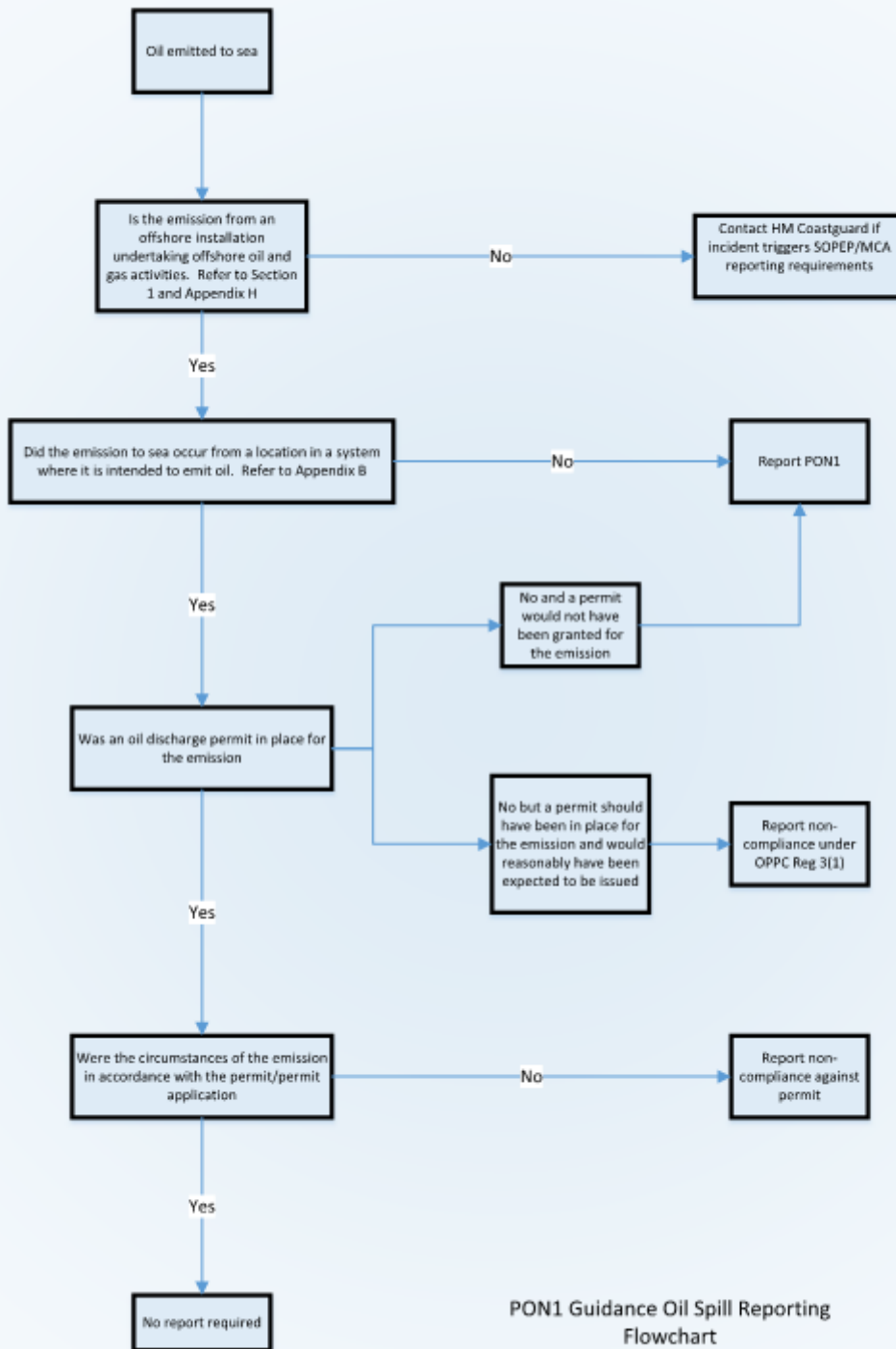
PON1s are notifications of releases and are not required to specifically identify the relevant company (as per Section 3.5) who may ultimately be accountable for the release.

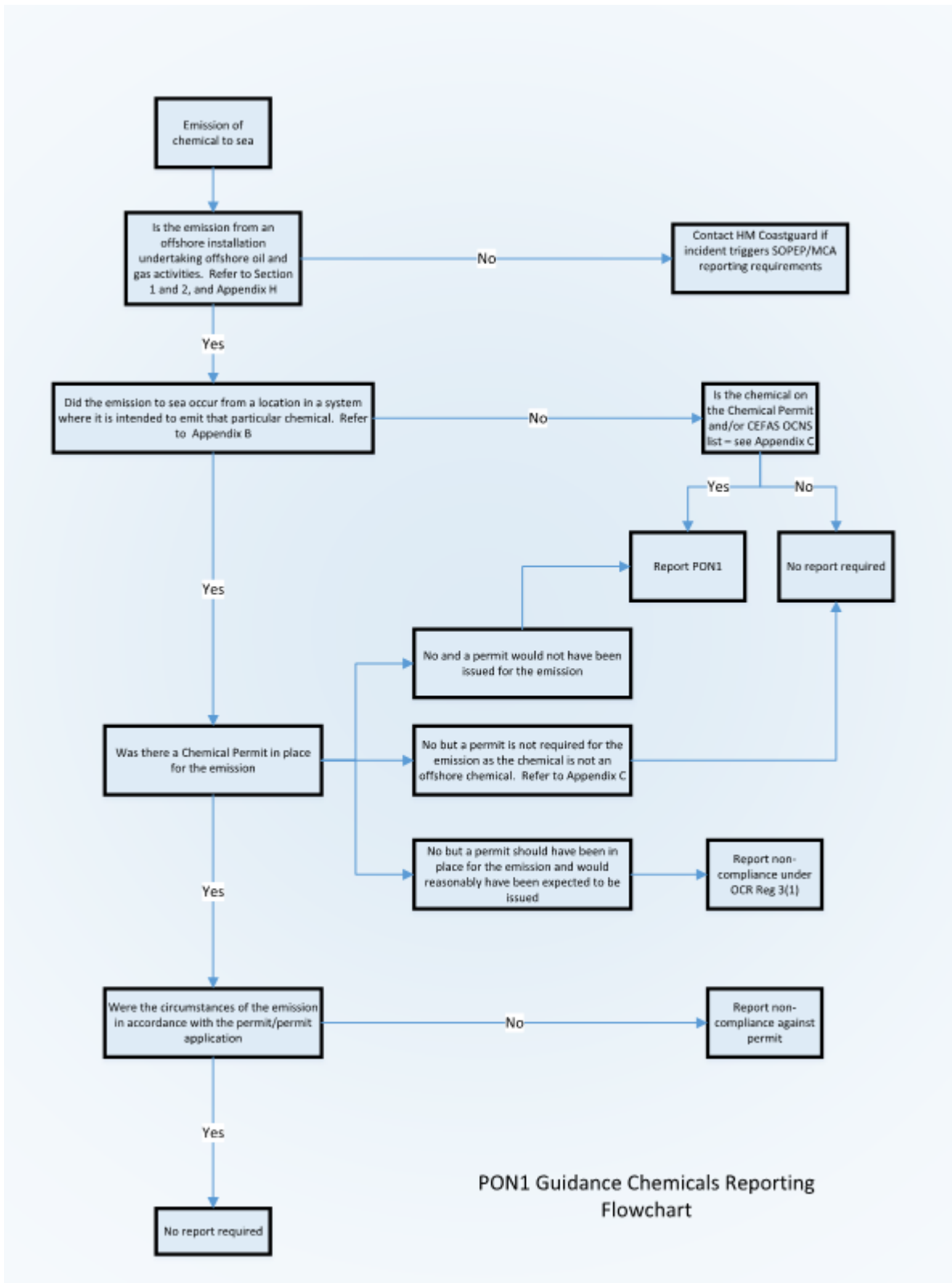
All PON1s are assigned to an Offshore Environmental Inspector. The Inspector will review and initially determine whether any further information relevant to pollution response is required.

The Inspector will then investigate the circumstances of the PON1. This may necessitate contacting the submitter of the PON1 and/or the relevant companies (as per Section 3.5) to obtain further information regarding the release.

All investigations concerning PON1 reportable releases are undertaken in accordance with OPRED's Enforcement Policy and may result in enforcement action. Further details can be found within the OPRED Enforcement Policy.

APPENDIX A: Reporting Flow Diagrams





APPENDIX B: Definition of Release and Discharge

OPPC and OCR define a release and discharge as follows:

A release is the emission to sea of oil or offshore chemicals (other than by way of a discharge).

A discharge is the intentional emission to sea of oil or offshore chemicals.

All discharges of oil or offshore chemicals must be subject to a permit. Any such discharge without a permit is non-compliant with OPPC or OCR and must be reported as a non-compliance.

In determining whether an emission is intentional the Department will consider the intent of the system from which the discharge takes place. For example, it is intended to discharge oil from the discharge point of a drainage system with oil recovery facilities. Therefore, oil cannot be released from that discharge point irrespective of the manner in which the oil entered into the drainage system. The oil discharge can only be compliant or non-compliant with the OPPC regime.

Intentional emissions can only occur from systems that are designed to (including systems deliberately reconfigured to) emit oil/chemical to sea.

All discharges of oil or offshore chemicals which are not in accordance with the terms and conditions of the permit are non-complaint, as are all discharges which occur in circumstances other than those detailed in the permit application. All such discharges must be reported as a non-compliance.

All other emissions of oil or offshore chemicals to sea are releases and must be reported on a PON1.

Permits cannot be obtained for potential or confirmed releases of oil or offshore chemicals.

APPENDIX C: Definitions of Oil and Offshore Chemicals

What is Oil?

OPPC defines oil as any liquid hydrocarbon or substitute liquid hydrocarbon, including dissolved or dispersed hydrocarbons or substitute hydrocarbons that are not normally found in the liquid phase at standard temperature and pressure, whether obtained from plants or animals, or mineral deposits or by synthesis.

What is an Offshore Chemical?

OCR defines an offshore chemical as any chemical, whether comprising a substance or a preparation, used or intended to be used in connection with offshore activities.

For the purposes of reporting a release, any chemical included on the CEFAS OCNS Lists and/or any chemical included on a chemical permit is an 'offshore chemical'. All releases of offshore chemicals to sea from an offshore installation, including any of the chemical's degradation or transformation products must be reported on a PON1 notification.

All releases of offshore chemicals included on the CEFAS OCNS list to sea from a purpose that does not require a chemical permit should be reported on a PON1 notification.

If a chemical is released to sea and that chemical is not on the CEFAS OCNS Lists and/or a chemical permit, it is not reportable on a PON1.

Hydrocarbon Based Offshore Chemicals

Releases of hydrocarbon based offshore chemicals (e.g. oil-based drilling mud, base oil etc) must be reported as a release of an offshore chemical(s) if detailed on a Chemical Permit. If the substance released is hydrocarbon based and is not included on a Chemical Permit or the CEFAS OCNS Lists it must be reported as an oil release.

APPENDIX D: Quantification of Release Quantities

The quantity released to sea must be included on all PON1 submissions. There are several ways quantities can be determined:

- Measured – e.g. quantities are determined based on level indication, tanks drop, tanks volume, metering, etc.
- Calculated – e.g. quantities are determined based upon a known flow rate to sea for a known duration, an estimated flow rate and duration or calculated from known quantities and known concentrations.
- Estimated – e.g. Bonn Agreement Oil Appearance Code quantities are estimated based upon observations of sheen size, appearance and coverage on the sea surface. Mobilisation of dedicated surveillance aircraft must be considered if the circumstances of the release deem it necessary in order to better estimate the quantity released.

All available methods must be considered to ensure that the quantification of released oil/offshore chemical is as accurate as possible.

Reporting of Chemical Mixtures and Dilutions

PON1 submissions must specify all offshore chemicals as they are detailed in the permit application e.g. PON1s for releases of drilling mud must list the quantity of each individual offshore chemical as detailed in the permit application.

Where a mixture of offshore chemicals is released to sea which is not subject to an approved Chemical Permit the individual offshore chemicals that comprise the mixture must be reported as detailed in the CEFAS Offshore Chemicals Notification Scheme Lists of Notified and Ranked Products (CEFAS OCNS Lists).

To achieve the required concentration certain offshore chemicals may require dilution with water prior to use. Water can only be deducted from a PON1 submission where the offshore chemical is detailed in the permit application in its undiluted form.

If an offshore chemical which is not subject to an approved Chemical Permit is diluted with water prior to use and subsequently released to sea the added water cannot be deducted from the PON1 submission.

If any offshore chemical is diluted with water after use (e.g. in a water injection system) and subsequently released to sea this water can be deducted from the PON1 submission.

APPENDIX E: Reporting Subsea Emissions of Offshore Chemicals

The permit requires all offshore chemicals are used or discharged in accordance with the conditions detailed in the permit application.

Any permit issued where the permit application describes the discharge to sea of offshore chemicals from a subsea system is considered to authorise the discharges of the offshore chemicals only from the specific discharge locations utilised during the normal operation of the system e.g. the vent port on a subsea valve that emits hydraulic fluid as a consequence of valve actuation.

All discharges of offshore chemicals from these specific discharge locations are either compliant or not with the conditions detailed in the permit application. Any such non-compliant discharge must be reported as a non-compliance and is not PON1 reportable.

Any emission to sea of offshore chemicals from any other subsea location is a release and must be reported on a PON1.

Specific Guidance on Subsea Control Systems Utilising Hydraulic Control Fluid

Any subsea hydraulic control system that is identified to have increasing hydraulic fluid use must be investigated to determine if the discharge is as per system intent. Any such increase in hydraulic fluid use remains compliant with the permit provided:

- the discharge is in accordance with system intent
- the annual permitted use and discharge quantities are not exceeded, and
- the hydraulic control fluid used is detailed on the relevant Chemical Permit application

Any emission of hydraulic control fluid out with system intent must be reported as follows:

PON1 reportable releases from subsea hydraulic control systems include:

- loss of containment from failed hoses, pipes, connections etc.

Non-compliant discharges from subsea hydraulic control system include:

- control valves seized or stuck in position that results in an emission of hydraulic fluid from the location intended to discharge hydraulic fluid

Investigation of Increased Subsea Emissions of Offshore Chemicals

The Department recognises that investigation may be required to ascertain the location of any subsea release or non-compliant discharge. In these circumstances Permit Holders may request the addition of the tracer dye to their permit. However, any further release or non-compliant discharge of the incumbent offshore chemical(s) during the leak investigation must be reported by updating the original PON1 or non-compliance.

APPENDIX F: Reporting Emissions from Drainage Systems

Emissions of Oil from Recoverable Drainage Systems

Recoverable drains are systems which route fluids to sea which have the provision for oil recovery thus reducing the amount of oil discharged.

The OPPC permit regime allows for the discharge of oil from recoverable drainage systems in the circumstances described in the permit application.

The permit details the sources of oil and will specify the approved location(s) for the discharge of oil from drainage systems.

Any discharge of oil from this location that is not in accordance with the terms and conditions of the approved permit is non-compliant and must be reported as a non-compliance.

Any discharge of oil to sea from a recoverable drain that was not subject to a permit, but where a permit would reasonably have been expected to be issued is still non-compliant with OPPC and must be reported as a non-compliance. This is because the intent of the drainage system is to emit oil in a manner that is compliant with a permit.

Any emission of oil to sea from any other part of the recoverable drainage system (e.g. from pipework or vessel failure) is a release (as the Department does not consider it is the intent of the drainage system to emit oil from such a failure point) and must be reported on a PON1.

Any aspect of a recoverable drainage system which by-passes the oil recovery system e.g. a direct to sea top-hat/storm drain, is considered to be a non-recoverable drain and the sections below apply.

Emissions of Oil from Non-Recoverable Drainage Systems

Non-recoverable drains are systems which route fluids to sea which have no provision for oil recovery meaning that all oil entering the system will be emitted to sea. This can include scuppers, top-hats and storm drains etc.

The Department does not consider that the intent of non-recoverable drainage systems is to discharge oil. Permits will not be issued for the discharge of oil from non-recoverable drainage systems.

Any emission of oil to sea from a non-recoverable drain is a release and must be reported as a PON1.

Examples of Drainage Reporting Requirements (Oil)

PON1 reportable releases from drainage systems:

- the release to sea of oil following a loss of integrity within the drainage system, including any drainage caisson.

- overflowing oily fluids from a drains tank direct to sea.
- loss of containment in a diesel tanks which results in the emission of oil via a non-recoverable drainage system.
- disposal of waste oil to sea via a non-recoverable drainage system.
- emission of oil to sea following the flushing of oil spilled to deck into a non-recoverable drainage system.
- A blockage in any drainage system resulting in the emission of oil to sea via a top hat/storm drain arrangement.

Non-compliant discharges to sea from drainage systems:

- discharges which occur after the failure of any aspect of the oil recovery systems described in the permit application.
- discharges which exceed the drainage system limits as specified in Table 1 of the permit.
- discharges from a location in the drainage system that was intended to emit oil but was not described in the permit application.
- discharges of oil via the drainage system that are not subject to a permit, but where a permit would reasonably have been expected to have been issued.

Emission of Offshore Chemicals from Drainage Systems

Offshore chemicals may be included on a permit for discharge via drainage systems. Any discharge to sea out with the circumstances described in the permit application is non-compliant and must be reported as such. This means any discharge of an offshore chemical via the drainage system which entered that system in a manner not described in the permit application is a non-compliant discharge and not a release (provided that chemical was included on the permit for discharge via the drains).

Any intentional emission to sea of an offshore chemical from a drainage system that was not permitted for discharge, but where a permit would reasonably have been expected to be issued, is non-compliant with OCR and must be reported as a non-compliance.

Any other emission of an offshore chemical to sea via the drainage system is a release and must be reported on a PON1.

Examples of Drainage Reporting Requirements (Offshore Chemicals)

PON1 reportable offshore chemical releases from drainage systems:

- the release to sea of offshore chemical following a loss of integrity within the drainage system, including any caisson.
- overflowing drains tank fluids which contain offshore chemical residues direct to sea.
- the loss of containment of offshore chemicals (from tanks, pumps, pipework etc) into a drainage system where the chemicals are emitted to sea and no permit is in place for

their discharge from that system and where no permit would reasonably have been expected to have been issued.

Non-compliance offshore chemical discharges to sea from drainage systems:

- discharges which exceed the maximum permitted quantity.
- discharges of offshore chemicals which are permitted for discharge (from the drainage system) but have entered the system in a manner not detailed in the permit application.
- the discharge of an offshore chemical from the drainage system where the discharge was not included on a permit but where a permit would reasonably have been expected to be issued.

APPENDIX G: Reporting Emissions from Caissons

Oil Emissions from Caissons

Discharges of oil to sea from caissons must be subject to an Oil Discharge Permit which identifies the permitted discharge location. Any emission of oil to sea from any point in the caisson other than from the permitted discharge location is a release and must be reported on a PON1.

Offshore Chemical Emissions from Caissons

Discharges of offshore chemicals from caissons must be subject to a Chemical Permit. Any emission of an offshore chemical to sea following a loss of caisson integrity is a release and must be reported on a PON1.

If oil and offshore chemical(s) are released from a caisson as a consequence of the same incident they can be reported on a single PON1.

APPENDIX H: Reporting Emissions from NPIs and Vessels

An offshore installation is any structure maintained on station by any means for the purposes of oil and gas activities.

For an NPI holding an accepted Safety Case the following PON1 notification requirements apply in the event of a release:

- any release of oil or offshore chemicals from an NPI (including attached equipment e.g. ROV) which is maintained on location to undertake offshore oil and gas activities must be reported on a PON1 notification providing the NPI was within 500m of the location of the offshore oil and gas activity at the time of the release.
- if the NPI is located beyond 500m from the location of offshore oil and gas activity any release of oil or chemical should be reported by telephone to HM Coastguard in accordance with their requirements.

For the purposes of PON1 reporting a vessel is an offshore installation when:

- the vessel is maintained on station for the purposes of oil and gas activity and there is an approved Chemical Permit or Oil Discharge Permit for the activity being undertaken from the vessel; and/or
- the vessel is included in the scope of an approved OPEP relevant to the activity being undertaken; and/or
- the vessel is included in the scope of a Consent to Locate issued under part 4a of the Energy Act 2008.

This means that any release of oil or offshore chemicals from a vessel, or anything attached to that vessel, when it is an offshore installation as defined above must be reported on a PON1 e.g. a release of hydraulic control fluid from an ROV deployed from a vessel is PON1 reportable if the vessel has a Chemical Permit or Oil Discharge Permit, is included in the scope of a Consent to Locate and/or an approved OPEP.

If a vessel is not an offshore installation as defined above, any release of oil or chemical should be reported by telephone to HM Coastguard in accordance with their requirements.

During bunkering and offloading operations between vessels and offshore installations any hose utilised for such operations is considered to be part of the offshore installation.

This means a PON1 notification is required for all releases from equipment up to and including the vessel hose end valve on bunkering and offloading hoses.

All other releases of oil or chemicals from the vessel during such operations (e.g. releases from vessel thrusters) should be reported by telephone to HM Coastguard in accordance with their requirements.

APPENDIX I: Reporting of Oil Releases during Flaring Operations

The introduction of high efficiency burners to prevent oil drop out during flaring operations is considered BAT/BEP. Therefore, any oil drop out to sea during such operations is a release and must be reported on a PON1.

APPENDIX J: Definitions

CEFAS OCNS	Centre for Environment, Fisheries and Aquaculture Science Offshore Chemical Notification Scheme
The Department	Offshore Petroleum Regulator for Environment and Decommissioning
HM Coastguard	Her Majesty's Coastguard
Licensee	See section 3.4
MCA	Marine and Coastguard Agency
NPI	Non-Production Installation
NPI Owner	See section 3.5
OCR	The Offshore Chemicals Regulations 2002 (as amended)
OPEP	Oil Pollution Emergency Plan
OPPC	The Offshore Petroleum Activities (Oil Pollution Prevention and Control) Regulations 2005 (as amended)
Oil and Offshore Chemical	Defined in Appendix C
Offshore installation	See section 1
Offshore Oil and Gas Activities	This definition of oil and gas activities is derived from terminology used in OPPC and OCR as applied to discharges and releases of oil and offshore chemicals. Offshore oil and gas activities are those activities carried out at or from an offshore installation in relation to:

	<p>a) The exploration for or exploitation of mineral resources</p> <p>b) activities associated with gas storage, loading and unloading</p> <p>c) conveyancing by pipeline</p> <p>d) the decommissioning of any offshore installation or pipeline</p> <p>e) the provision of accommodation on an offshore installation related to the above activities</p>
Ongoing	Any continuous or intermittent release from the same source
OPRED	Offshore Petroleum Regulator for Environment and Decommissioning.
Permit Holder	See section 3.5
Pipeline Operator	See section 3.5
Production Installation Operator	See section 3.5
ROV	Remotely Operated Vehicle
Secretary of State	Means the Secretary of State for Business, Energy and Industrial Strategy, or, in the event of a change of the name of the department, their successor Secretary of State with responsibility for the environmental regulation of offshore oil and gas activities.
SOPEP	Shipboard Oil Pollution Emergency Plan
Vessels	A vessel is an offshore installation in the circumstances set out in Appendix H
Well Operator	See section 3.5

This publication is available from: www.gov.uk/beis

If you need a version of this document in a more accessible format, please email enquiries@beis.gov.uk. Please tell us what format you need. It will help us if you say what assistive technology you use.