



Offshore Petroleum Regulator
for Environment & Decommissioning

Integrated Reporting Service

Guidance



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Purpose

This document provides guidance on how and when to submit non-compliance notifications and notices to OPRED/BEIS (the Department) to report breaches of environmental legislation and/or conditions associated with environmental permits, consents and licences during offshore oil and gas activities via the Integrated Reporting Service (IRS).

Amendment Record

While every effort has been made to ensure the accuracy and completeness of this Guidance it is acknowledged that information may become out of date or may on occasion include errors, for example, links to Department and Third-Party websites can fail as a result of website changes.

Please contact the Department for clarification on any aspects of the guidance. The Department will update / correct any information identified as outdated or erroneous at the time of the next revision of this Guidance.

Any amendments/enquires relating to this document should be addressed, in the first instance to the Department's Offshore Environmental Inspectorate Team.

No	Amendment (summary)	Reviewed/amended by	Approved by	Position	Date
1	First Issue	E Leslie and D MacDonald	A Taylor	Offshore Inspectorate Technical Lead	September 2021
1.1	Corrected reporting timeframe for OPPCNCN (section 6.4) and OCRNCN (section 7.4) from 48 hours to 2 working days. Included additional text in section 7.4	D MacDonald	A Taylor	Offshore Inspectorate Technical Lead	November 2021

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1.0 Introduction

IRS is a service hosted within the United Kingdom Energy Portal. IRS is used to report the following to the Department;

- **PON1** – Releases to sea of oil or offshore chemicals
- **PON2** - Loss of deposition of materials to sea
- **PON10** – Non-compliance with Part 4A of the Energy Act/Consent to Locate (including Standard Marking Schedule)
- **OPPC NCN** – Non-compliance with the OPPC Regulations / an OPPC Permit
- **OCR NCN** – Non-compliance with the OCR Regulations / an OCR Permit
- **PPC NCN** – Non-compliance with the PPC Regulations / a PPC Permit
- **F-Gas/ODS NCN** – Non-compliance with the F-Gas / ODS Regulations
- **General Regulatory NCN** – Any breach / non-compliance with Regulations not listed above, for example a breach associated with the conditions of a Geological Survey or Marine Licence.

Readers of these guidance notes may find it useful to consult [OPREDs offshore environmental legislation page](#) for information on environmental regulations and guidance on offshore oil and gas exploration and production, offshore gas unloading and storage and offshore carbon dioxide storage activities.

To access the IRS users must first register for an Energy Portal Login Account (<https://itportal.nstauthority.co.uk/eng/fox>). Thereafter to access the IRS users must be given the appropriate permissions by their organisations IRS administrator. Access to IRS is through the same link (<https://itportal.nstauthority.co.uk/eng/fox>).

IRS has been designed to allow any installation operating in the UKCS, be that a fixed installation, mobile drilling unit, diving support vessel, flotel etc which may require to make a notification through IRS. If you require an IRS installation account to be set up contact OPRED@energysecurity.gov.uk

IRS has been designed in line with the Government Digital Services (GDS) guidelines and has been designed to be intuitive to use. On-screen guidance has been provided within IRS screens to assist the reporter in completing each IRS submission. Consequently, this guidance does not focus on providing instruction on how to use IRS (with the exception of some specific examples), rather the document focuses on reporting requirements including reporting timescales.

In the event there are any issues relating to the functionality of IRS contact ukop@nstauthority.co.uk or 0300 067 1682.

2.0 Reporting

2.1 Reporting Obligations

During offshore oil and gas activities the responsibility for ensuring any required non-compliance notification or notice is reported to the Department rests with the relevant environmental permit holder. If there is no permit holder reporting responsibility rests with the Production Installation Operator, Well Operator, NPI Owner or Pipeline Operator dependent on the nature and scope of the offshore oil and gas activities being undertaken at the time the incident occurred.

All non-compliance notifications and notices are to be made electronically to the Department via IRS. In certain circumstances additional telephone notifications are also required. This requirement is highlighted within applicable IRS screens and is also detailed within this guidance document.

3.0 PON1

3.1 Legislative Background

A Petroleum Operations Notice 1 (PON1) is the notice used to report all releases to sea of oil and offshore chemicals that occur during offshore oil and gas activities.

The Offshore Petroleum Activities (Oil Pollution Prevention and Control) Regulations 2005 (OPPC) and the Offshore Chemical Regulations 2002 (OCR) include provisions which require the permit holder or, if there is no permit holder, the operator to provide details of the following:

- 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 oil or offshore chemicals 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 OPPC and OCR 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.

3.2 PON1 Guidance

The PON1 Guidance (including Directions issued by the Secretary of State under regulation 11A(2) of OPPC and regulation 15(1A) of OCR as to the form and manner of reports) requiring the provision of information in relation to releases to sea of oil or offshore chemicals during offshore oil and gas activities can be found here <https://www.gov.uk/guidance/oil-and-gas-environmental-alerts-and-incident-reporting>

3.3 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.

The PON1 guidance (including all appendices) provides detailed instructions as to the circumstances when a PON1 is required, the information required on a PON1 submission and directions from the Secretary of State as to the form and manner in which this information is to be provided.

3.4 Timeframe for PON1 submissions

IRS PON1 submissions

A PON1 must be submitted without delay and within six hours in accordance with the terms and conditions of the approved OPPC/OCR 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. This means that a PON1 must be submitted via IRS within six hours of the permit holder/operator becoming aware of the release.

Note – if a PON1 cannot be submitted via IRS then this should be done by emailing a copy of a completed PON1 proforma to OPRED@energysecurity.gov.uk. A copy of the proforma can be found [here](#)

Telephone Notifications

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 (including when an update to an ongoing PON1 first exceeds 1 tonne)
- is within 40 kilometres of the coast
- exceeds any specific telephone reporting threshold detailed within a relevant OPEP
- is the first report for an ongoing release (telephone notification to HM Coastguard only)

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

3.5 Ongoing PON1s

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

Each PON1 notification which reports an “ongoing” release requires the submitter to confirm whether the ongoing release rate has “increased”, “decreased” or there has been “no change”. 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.

4.0 PON2

4.1 Legislative Background

The granting of a Consent to Locate by the Secretary of State under Part 4A (Works Detrimental to Navigation) of the Energy Act 2008 allows for such conditions as the Secretary of State considers appropriate to be applied to any subsequent consent issued for works that are detrimental to navigation as a consequence of offshore oil and gas activities (referred to as exploitation or exploration operations in the 2008 Energy Act). Any such consent issued by the Department will include conditions that require any materials lost or dumped to sea during offshore oil and gas activities to be reported on a Petroleum Operations Notice 2 (PON2).

4.2 PON2 Guidance

A PON2 is the notice used to report material lost or dumped at sea that occurs during offshore oil and gas activities subject to an approved Consent to Locate. Responsibility to ensure any required PON2 is submitted rests with the consent holder.

Additional PON2 guidance can be found on OPRED's website [here](#).

4.3 Requirement for PON2 submission

A PON2 must be submitted to report material lost or dumped to sea that has the potential to pose a threat to navigation or the safety of users of the sea. Note – this excludes material that is deposited in accordance with an approved Consent/Marine Licence etc.

The following information is provided to assist with PON2 reporting:

- material deposited under conditions of force majeure (i.e. material lost or dumped to sea in order to protect the safety of any person or the installation) must be reported.
- synthetic materials, which are impervious to rot, can foul the propellers of vessels and present a hazard to divers and submersibles. They also constitute a significant hazard to marine life.
- plastic sheeting, bags and containers can block the cooling water intakes of vessels of all sizes as well as presenting a significant hazard to marine life.
- materials such as oil drums, lengths of wire and other heavy objects can represent a hazard to vessels and/or interfere with navigation. They can also snag and damage fishing nets, resulting in lost fishing time or in extreme cases, threaten the safety of the fishing vessel.
- any maritime safety equipment (e.g. life rafts, life rings, life jackets etc) lost to sea must be reported to minimise the likelihood of unnecessary response mobilisation.

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- materials lost or dumped to sea may move considerable distances and may have significant impacts away from the initial deposit location.
- caissons which drop from installations have the potential to impact oil and gas bearing subsea infrastructure.
- any other object which if dropped has the potential to pose a threat to navigation or the safety of users of the sea.

As submission of a PON2 is driven by a Consent to Locate condition OPRED would only expect a PON2 submission if there was any material lost or dumped to sea from an installation which had been granted a consent to locate. There is no requirement to report a PON2 when there has been material lost or dumped to sea from a NPI, vessel, etc which has not been granted a Consent to Locate.

4.4 Timeframe for PON2 submissions

A PON2 must be submitted within 6 hours of identification of material being lost or dumped at sea.

Note if a PON2 cannot be submitted via IRS then this should be done by emailing a copy of a completed PON2 proforma to OPRED@energysecurity.gov.uk. A copy of the proforma can be found [here](#)

4.5 Ongoing PON2

Generally, PON2s are not considered to have an 'on-going' aspect.

There is no requirement to update a PON2 at a specified frequency unless directed to do so by an OPRED Inspector.

5.0 PON10

5.1 Legislative Background

The granting of a Consent to Locate by the Secretary of State under Part 4A (Works Detrimental to Navigation) of the Energy Act 2008 allows for such conditions as the Secretary of State considers appropriate to be applied to any consent issued for works that are detrimental to navigation as a consequence of offshore oil and gas activities (referred to as exploitation or exploration operations in the 2008 Act). This allows the Department to require the provision of appropriate navigational aids/markings at/on the works and any such consent will include both Consent Conditions and, where applicable, an associated Standard Marking Schedule. The consent will also require that any incidents which result in non-compliance/breaches with the provision of the required navigational aids/markings are reported to the Department on a Petroleum Operations Notice 10 (PON10).

5.2 PON10 Guidance

A PON10 is the notice used to report breaches of a condition of a Consent to Locate, including an associated Standard Marking Schedule (SMS). In addition, the Department expects that a PON10 is submitted to report any breach of the relevant conditions of Part 4A of the Energy Act.

Additional Consent to Locate guidance is currently being developed by the Department. This guidance will address comments received further to an initial consultation and other issues that have been identified since the implementation of the Energy Act regime. The aforementioned consultation document, can be found [here](#).

5.3 Requirement for PON10 submission

A PON10 must be submitted if there breaches of any Consent condition including the associated SMS (where applicable).

Table 1 details the Consent Conditions that if breached require the submission of a PON10 and provides examples of the incidents that require the submission of a PON10.

Table 1:

Consent Condition	Examples of PON10 reportable incidents
Consent Validity	Undertaking operations out with the approved start and/or end dates of the consent.

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	Consent not varied to include significant changes which could impact on navigational safety, for example location or removal of a mobile installation or adjacent vessel.
Location of Works	Undertaking operations out with the approved location specified within the Consent.
Commencement of Works	<p>Prior to the Works;</p> <ul style="list-style-type: none"> ● Failure to lodge emergency response manuals including bridging documents, ● Not developing a collision risk management document, ● Not utilising EERV crews experiences in traffic monitoring duties or briefing ERRV crews on relevant shipping routes, ● ERRV not being equipped with an Automatic Identification System (AIS) and/or Automatic Radar Plotting Aids (ARPA), ● Not notifying the UK Hydrographic Office at least 48 hours in advance of the commencement of the Works, ● Not notifying Kingfisher Information Services at least two weeks in advance of the Works unless prior agreement has been made with the relevant fisherman's federation, ● Not providing advance notice to main operators of vessels using relevant shipping routes in the vicinity of the Works,
During the Works	<ul style="list-style-type: none"> ● Any mobile installations or vessels connected with the Works not marked in accordance with the International Regulations for the Prevention of Collisions at Sea, except where the mobile installation or vessel is required by the Secretary of State to be marked in accordance with the Standard Marking Schedule, ● Using the crown anchor buoys for the deployment and recovery of any mooring anchors without the prior written consent of the Secretary of State, ● Using the sub-surface acoustically released buoys for the recovery of any mooring anchors at a depth less than 45m below mean sea level, ● Not providing timeously Radio Navigation Warnings (where required), ● Following completion of location operations not proving the Department with a diagram showing the position of the Aids to Navigation,

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	<ul style="list-style-type: none"> • Not lighting the Works with at least 200 candela lighting if the height of the Works exceeds 200m, • Navigation lights not synchronised with a mobile installation or vessel that is located adjacent to, or connected to, the permanent / fixed installation (excluding subsidiary lights), • Not providing UKHO with written confirmation of the precise geographical co-ordinates of the permanent / fixed installation and the geodetic datum upon which the co-ordinates are based including as-laid charts or engineering drawings (if appropriate), • Not keeping the permanent / fixed installation and associated infrastructure in good repair.
Cessation of Works	Not advising the Department at least 28 days in advance of the cessation of the Works
Consent Variation	Not informing the Department immediately becoming aware that any of the information on which the issue of the consent was based may change, or has changed
Consent non-compliance	Not informing the Department of any non-compliance relating to Consent Conditions within 24 hours of identification.
Other / bespoke	As included within the Consent.

Table 2 details the SMS Conditions that if breached require the submission of a PON10 and provides examples of the incidents that require the submission of a PON10.

Note: Within IRS when reporting any breach of the SMS you must also report the breach of the related Consent Condition which requires the installation to be marked as per the SMS (Condition 5e).

Table 2:

Standard Marking Schedule Condition	Examples of PON10 reportable incidents
General	Not having in place an auditable system to ensure that the Aids to Navigation (AtN) requirements specified in this Schedule and/or as required in the consent are fully complied with at all times.

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	<p>Not maintaining or making available to the Department a written record of the date and time of the inspections, and of any faults found and repairs made, to AtN.</p>
<p>Radio/Radar</p>	<p>Operating a radio beacon or radar beacon in the Marine Radio or Radar frequency bands without the prior approval of the Secretary of State.</p>
<p>Lights*</p>	<p>Main Lights</p> <p>Not exhibiting a flashing white light (or lights operating in unison) exhibiting Morse letter 'U' every 15 seconds with;</p> <p>The duration of each dot not equivalent to the duration of darkness between the dots and of that between the dot and the dash</p> <p>The duration of the dash shall not being three times the duration of one dot.</p> <p>The eclipse between successive Morse letters being less than 8 seconds or more than 12 seconds.</p> <p>The lights being obstructed.</p> <p>The effective intensity of the light not being at least 12,000 candela or not being visible for at least 15 nautical miles.</p> <p>Lights not being exhibited from 15 minutes prior to sunset to sunrise.</p> <p>Lights not operating when visibility is less than 2 nautical miles.</p> <p>Secondary Lights</p> <p>No secondary system in place that comes into operation upon failure of primary system.</p> <p>Not independently powered from a source other than the primary system and capable of continuous operation at full power for at least four calendar days (96 hours)</p> <p>Not exhibiting a flashing white light (or lights operating in unison) exhibiting Morse letter 'U' every 15 seconds with;</p>

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	<ul style="list-style-type: none"> • The duration of each dot not equivalent to the duration of darkness between the dots and of that between the dot and the dash • The duration of the dash not being three times the duration of one dot. • The eclipse between successive Morse letters being less than 8 seconds or more than 12 seconds <p>The lights being obstructed.</p> <p>The effective intensity of the light not being at least 1,200 candela or not being visible for at least 10 nautical miles.</p> <p>Lights not being exhibited from 15 minutes prior to sunset to sunrise.</p> <p>Lights not operating when visibility is less than 2 nautical miles.</p> <p>Subsidiary Lights</p> <p>Not exhibiting a flashing light red (or lights operating in unison) exhibiting Morse letter 'U' every 15 seconds with;</p> <ul style="list-style-type: none"> • The duration of each dot not equivalent to the duration of darkness between the dots and of that between the dot and the dash • The duration of the dash not being three times the duration of one dot. • The eclipse between successive Morse letters being less than 8 seconds or more than 12 seconds. <p>The lights being obstructed.</p> <p>The effective intensity of the light not being 15 candela or not being visible for at least 2 nautical miles.</p> <p>Lights not being exhibited from 15 minutes prior to sunset to sunrise.</p> <p>Not clearly indicating the horizontal extent of the Works (excluding extremities marked by a white flashing light as detailed above)</p>
Fogs*	<p>Fog Signals</p> <p>Not sounding when visibility is less than 2 nautical miles.</p> <p>Not sounding a Morse letter 'U'</p>

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	<p>Not sounding the following pattern- Blast 0.75 seconds, silent 1 second, blast 0.75 seconds, silent 1 seconds, silent 24 seconds.</p> <p>Not having a range of at least 2 nautical miles</p> <p>Not having a secondary fog signal which has a range of 0.5 nautical miles.</p> <p>A secondary fog signal not coming into operation automatically or in the event of total failure of the main signal, or if partial failure of the main signal results in the usual range falling below 0.5 sea mile in any direction.</p> <p>Either the main or secondary fog signal not having a power source independent of the main supply that is capable of powering either the main or secondary fog signal for at least 96 hours.</p>
ID Panel	<p>Not displaying identification panels showing the registered name or other designation of the structure (vessel) in black letters/figures at least 1 metre high on a yellow background.</p> <p>Not arranged so at least one panel is visible from any direction.</p>
Mooring and Buoys	<p>An unlit buoy attached to the mooring of a structure not coloured as per the Standard Marking Schedule.</p>
Other / bespoke	<p>As included within the Consent.</p>

*There is no requirement to report the breach of an SMS condition for a navigation light or fog signal if the failure only occurs during a period when the navigation light or fog signal was not required to be available and the failure is repaired before the navigation light or fog signal is required to be available (e.g. a bulb in a navigation light is identified to fail in the hours of day light and the bulb is replaced before the navigation light is required to be available or a fog signal goes into fault when visibility is greater than 2 nm and the failure is repaired prior to the fog signal being required to be available for service)

Carrying out activity without a consent to locate

In addition, Table 3 details the Energy Act regulation that if breached the Department expects to be notified of via a completed PON10.

Table 3

Regulation	PON10 reportable incident
82A (1) - Restriction of works detrimental to navigation	Carrying out any operation detailed in regulation 82A(4) in the regulated zone (regulation 82Q) without a consent to locate from the Secretary of State.

5.4 Timeframe for PON10 submissions

In the event of any of the following reportable incidents a PON10 must be submitted within 1 hour of identification:

- if any part of the Works and associated infrastructure is wrecked or damaged or goes adrift,
- if all Aids to Navigation are non-operational, or
- if the nominal range of either the main or secondary white lights is less than 10 nautical miles.

All other PON10s must be submitted within 24 hours of identification of the reportable incident.

Note - if a PON10 cannot be submitted via IRS a completed PON10 proforma must be sent by email to OPRED@energysecurity.gov.uk A copy of the PON10 proforma can be found [here](#)

5.5 Ongoing PON10

PON10s are considered to be ongoing if the non-compliance has not been addressed prior to submission of the notice, e.g. a PON10 is ongoing when a navigation light or foghorn continues to be non-operational when it should be available for service.

There is no requirement to update an on-going PON10 at a specified frequency unless directed to do so by an OPRED Inspector.

5.6 Navigation Light range

The SMS requires that Navigation Lights are exhibited with the required luminosity specified in candela. Consent holders must ensure that the navigation lights provided comply with the relevant candela requirements. To assist in this process the UK General Lighthouse Authorities have advised that a navigation light with a luminosity of 1,200 candela equates to a visible range of approximately 10 nautical miles and a navigation light with a luminosity of 12,000 candela equates to a visible range of approximately 15 nautical miles.

6.0 OPPC NCN

6.1 Legislative Background

The Offshore Petroleum Activities (Oil Pollution Prevention and Control) Regulations 2005 (OPPC) control emissions of oil from offshore oil and gas installations into relevant areas of the United Kingdom Continental Shelf.

OPPC includes provisions which 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 save in accordance with the terms or conditions attached to a permit
- Any other incident involving oil where there has been or may be any significant effect on the environment by means of pollution

OPPC also require that a person who discharges oil must provide the Secretary of State with such information as they may reasonably require for the purpose of performing their functions under the Regulations.

Note - any release of oil from an offshore installation must be reported on a PON1.

6.2 OPPC Guidance

An OPPC Non-Compliance Notification (OPPCNCN) is the notification used to report breaches of OPPC Permit Conditions, including the Standard Industry Conditions (SICs), and certain other breaches of the OPPC Regulations as relevant to oil discharges from an offshore installation.

There is specific OPPC guidance which can be found [here](#)

6.3 Requirement for an OPPC NCN

An OPPC NCN must be submitted in the event of any breach of the terms and conditions of an approved OPPC permit, including the Standard Industry Conditions (SICs), or a breach of the specified OPPC regulations.

Tables 4 and 5 below provide a summary of non-compliances with permit conditions.

Tables 6 provides a summary of non-compliances with SICs.

Table 7 provides a summary of regulatory requirements that are subject to the OPPCNCN regime.

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Table 4 details the OPPC schedule of permit conditions that if breached require the submission of a OPPCNCN and provides examples of the incidents that require the submission of an OPPCNCN.

Table 4:

Permit Condition	Examples of OPPCNCN reportable incidents
1. Permit Validity	<p>1.1 Undertaking oil discharge operations out with the date of permit validity.</p> <p>1.2 Undertaking oil discharges from an offshore installation not specified in the permit or as detailed in permit application.</p> <p>1.3 Inaccurate details and/or description of the oil discharge operations in the permit application.</p> <p>1.4 Failure to amend and resubmit the permit application prior to changes being made to the offshore installation which affect the accuracy of the details in the permit application.</p> <p>1.5 Failure to update and resubmit the permit in the month of January to provide the required annual forecast data.</p>
2. Permit Availability	2.1 Failure to make the permit (including the SICs) available to personnel undertaking the Oil Discharge Operations.
3. Permitted Discharges	3.1 Failure to undertake oil discharge operations in accordance with the arrangements described within the Permit Application, the Permit and the Standard Industry Conditions.
4. Discharge Conditions	<p>4.1 Failure to comply with any limit(s) for the parameters from the discharge source as specified in Table 1 of the permit e.g. breaches of the specified monthly average, maximum concentration, maximum load (note – breach of forecast data is not an OPPCNCN reportable incident).</p> <p>- note: A maximum load is applied to all permitted oil discharge systems. The default maximum oil load will be 1te/12hr period, but this may be varied on a case-by-case basis.</p> <p>4.2 Oil discharges undertaken not:</p> <ul style="list-style-type: none"> • from the specified discharge location; • at the specified discharge height; • as per the specified circumstances of use;

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	<ul style="list-style-type: none"> • having been quantified at the specified flow metering location(s) • having been sampled at specified sampling location(s) (all as per Table 1 of the permit) <p>4.3 Failure to sample and quantify the oil discharges in accordance with the requirements for monitoring specified in Table 2 of the permit</p> <p>See Table 5 below for more details</p>
5. Standard Industry Conditions	<p>5.1 Any failure to comply with the SICs.</p> <p>See Table 6 below for more details</p>
6. Bespoke Conditions	<p>6.1 Any failure to comply any bespoke condition(s) added to the oil discharge permit by the Department.</p>

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Table 5 summarises all potential OPPC Permit Table 1 and 2 requirements that if breached require the submission of an OPPCNCN – any breach of the parameters/requirements identified “NC” in the following table requires the submission of an OPPCNCN.

Table 5

System	Sub-System	Table 1 – Discharge Limit Parameter Breached						Table 2 – Monitoring Parameter Breached			
		Maximum Load (t/12hour)	Maximum Concentration (mg/l or mg/kg)	Monthly Average Concentration (mg/l)	Average Concentration for Period of Operation (mg/l)	Bi-Annual PW Sampling	Forecast	Sampling at Required Frequency	Collection of Additional Samples	Volume Measurements Uncertainty	Calculation Method Application
Wells	Drill Cuttings	NC						NC	NC		NC
	Drill Fluids	NC						NC	NC		NC
	Well Intervention	NC						NC	NC		NC
	Well Test	NC	NC		NC			NC	NC		NC
	Well Clean Up	NC						NC	NC		NC
	Well Abandonment	NC						NC	NC		NC
	Wells Other	NC						NC			NC
Production	Produced Water >2te	NC	NC	NC		NC		NC	NC	NC	NC
	Produced Water <2te	NC	NC	NC		NC		NC	NC	NC	NC

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	Batch	NC	NC	NC		NC		NC	NC	NC	NC
	Other	NC	NC	NC				NC	NC		NC
Displacement	Other		NC	NC				NC	NC		NC
Drainage	Other	NC	NC	NC				NC	NC		NC
Sand/Scale	Offline	NC	NC					NC	NC		NC
	Online	NC	NC					NC	NC		NC
	Other	NC	NC					NC	NC		NC
Subsea	Pipeline	NC						NC	NC		
	Other	NC						NC	NC		
Miscellaneous	Other	NC						NC	NC		NC

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Table 6:

Standard Industry Condition	Examples of OPPCNCN reportable incidents
1. Operation and Maintenance	<p>1.1 Failure to operate and maintain the offshore installation to prevent releases of oil to sea or non-compliance with the terms and conditions of the permit.</p> <p>1.2 Failure to have arrangements in place to prevent oil releases from the offshore installation or non-compliances with the terms and conditions of the permit (as per Condition 1.1 of the SICs).</p> <p>1.3 Failure to operate and maintain systems on the offshore installation to minimise oil discharges to sea by applying BAT/BEP.</p> <p>1.4 Failure to have arrangements in place to meet the requirements of SIC 1.3 (Requirement to minimise oil discharges to sea by applying BAT/BEP)</p> <p>Note – Any breach of SIC 1.1 which results in a release of oil to sea from a permitted oil discharge system must also be reported on a PON1.</p>
2. Reporting	<p>2.1 Failure to report oil releases from the offshore installation in accordance with the PON1 & IRS guidance as issued by the Department.</p> <p>2.2 Failure to report non-compliances with the terms and conditions of the permit to the Department within the specified timeframes.</p>
3. Maintenance of Records	<p>3.1 Failure to make and retain accurate records of the information as specified in Table A of the SICs</p> <p>3.2 Failure to retain the records specified in Table A for at least 5 years on a manned offshore production installation.</p> <p>3.3 Failure to retain the records specified in Table A for at least 5 years in a specified location for a normally unmanned offshore installation.</p>

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	<p>3.4 Failure to retain the records specified in Table A for the duration of the permitted operation on a non-production installation and/or then at a specified location for at least 5 years.</p> <p>3.5 Failure to maintain a demonstrable audit trail for all records required to be retained by virtue of the permit and/or failing to make the records available to the Department on request.</p>
4. Submission of Returns	4.1 Failure to submit any permit returns (via EEMS) as required by virtue of Table B of the SICs
5. Training	<p>5.1 Failure to provide sufficient information, instruction and training to all persons who carry out activities associated with oil discharge operations.</p> <p>5.2 Failure to maintain records to demonstrate how persons who carry out activities associated with oil discharge operations have been provided with sufficient information, instruction and training.</p>

Table 7 details the OPPC regulations that if breached require the submission of a OPPCNCN and provides examples of the incidents that require the submission of an OPPCNCN.

Table 7:

Regulation	Examples of OPPCNCN reportable incidents
3(1) Discharge permits	Discharging oil without a valid permit.
5A(1) Publicity for permit applications	Failure to make a copy of the application available, or supply a copy, as required.
5A(2) Publicity for permit applications	Failure to publicise a notice in such newspapers on such occasions as to be likely to come to the attention of any persons likely to be interested in, or affected by, the discharge of oil.
11A(2) – Provision of information to the Secretary of State	<p>Failure to provide specified information to the Secretary of State concerning an incident resulting in a release or a discharge not in accordance with a permit.</p> <p>Any release of oil from systems on an offshore installation that are not in the scope of a permit must be reported in accordance with the PON1 guidance (which includes directions from the Secretary of State as to the form and manner of the information required). Should any such release not be reported in accordance with the</p>

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	<p>PON1 guidance it is a breach of the requirements of OPPC Regulation 11 A (2) (b) which must be reported as OPPCNCN.</p> <p>Any discharge of oil from an offshore installation undertaken save in accordance with the terms of, or conditions attached to a permit in is a breach of OPPC Regulation 3 (1). Any such discharge must be reported on an OPPCNCN. The information required on an OPPCNCN constitutes the directions from the Secretary of State as to the form and manner of the information required in the event of such a discharge as per OPPC Regulation 11 A (2) (a).</p>
Other	<p>This can be used to notify the Department of another breach of the Regulations.</p>

6.4 Timescale for OPPCNCN submissions

Maximum Load OPPCNCN submissions:

When any oil discharge exceeds the maximum load value(s) specified in Table 1 of the permit the Permit Holder must notify the Department by telephone without delay and within one hour of the identification of the non-compliance and submit a completed OPPCNCN form via IRS within six hours of the identification of the non-compliance.

Note - it is incumbent upon permit holders to have systems in place to enable determination of elevated discharges of oil to sea (e.g. monitoring of process trends, chemical injection, oil on sea surface, etc). This must ensure that additional sampling is undertaken as per the requirements of the oil discharge permit, which in turn will enable the Permit Holder to determine whether the maximum load value has been breached (the default maximum oil load is 1te/12hr period, but this may be varied on a case-by-case basis).

All other OPPCNCN submissions:

The Permit Holder must submit a completed OPPCNCN form on IRS within 2 working days of the identification of the non-compliance.

Note – if a NCN cannot be submitted via IRS then this should be done by emailing a copy of a completed OCR NCN proforma to OPRED@energysecurity.gov.uk. A copy of the proforma can be found [here](#)

6.5 OPPCNCN requirements for ongoing incidents

OPPCNCNs are considered to be ongoing if the non-compliance relates to any discharge, sampling/quantification or limits for parameters as specified in Table 1 of the permit or any

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Monitoring requirements as specified in Table 2 of the permit and the issue that results in the non-compliance persists during ongoing oil discharge operations.

Table 7 below identifies all the potential parameters/requirements as specified in the Tables as attached to the permit which if breached require an OPPCNCN submission and would fall to be considered “ongoing” OPPCNCNs if the non-compliant issue persists during ongoing oil discharge operations.

The following are examples OPPCNCNs that are considered ongoing:

- any continuing oil discharge operations that result in consecutive sample analysis results that breach the specified maximum oil concentration parameter limit
- any continuing oil discharge operations that will or may result in the breach of the specified maximum oil load parameter limit for consecutive 12hr periods.
- the inability to obtain required samples of oil discharges for consecutive required sampling occasions.
- faults with any metering/quantification systems such that there is a continued inability to comply with any specified measurement uncertainty parameter or any other required quantification method.
- Continuing oil discharge operations that are:
 - undertaken from a discharge location not specified in the permit
 - undertaken at a discharge depth not specified in the permit
 - sampled from a location not specified in the permit

The required frequency of updates to an ongoing OPPCNCN reportable incident must be agreed with the Department following the submission of the initial ongoing OPPCNCN.

In most circumstances the Department expects that the permit holder will submit separate OPPCNCNs for each identified permit non-compliance. The permit holder may only submit an OPPCNCN detailing multiple breaches of permit conditions, SICs and/or regulations with the prior agreement of the Department.

7.0 OCR NCN

7.1 Legislative Background

The Offshore Chemical Regulations 2002 'OCR' control the use and discharge of offshore chemicals from offshore oil and gas installations into relevant areas of the UKCS.

OCR includes provisions which 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 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 other incident involving offshore chemicals where there has been or may be any significant effect on the environment by means of pollution

OCR also requires that a person who releases 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.

Note - any release of an offshore chemical from an offshore installation must be reported on a PON1

7.2 OCR Guidance

An OCRNCN is the method used to report breaches of Chemical Permit OPPC Conditions and other breaches of OCR.

There is specific OCR guidance which can be found [here](#)

7.3 Requirement for an OCR NCN submission

An OCRNCN must be submitted if there breaches of the Conditions of a Chemical Permit or a breach of any relevant regulatory requirements of OCR.

Table 8 details the OCR schedule of permit conditions that if breached require the submission of a OCRNCN and provides examples of the incidents that are breaches of the specified permit conditions:

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Table 8:

Condition	Examples of OCRNCN Reportable Incidents
1 Permit validity	Using and or discharging offshore chemicals out with the approved start and or end date.
2 Permitted chemicals	<p>Using and/or discharging offshore chemicals not detailed in the Permit.</p> <p>Not using and/or discharging offshore chemicals as detailed in the Permit application. This includes the circumstances of chemical use/discharge detailed in the Chemical Risk Assessment.</p> <p>Not submitting an OCRNCN within 2 working days of identification of the non-compliance.</p>
3 Permitted quantities of chemicals	Using and/or discharging more than 110% of permitted quantities of offshore chemicals.
4 Prevention of Pollution	Not taking appropriate measures to minimise discharges of offshore chemicals, in particular through the appropriate use of technology; and to ensure that necessary measures are taken to prevent incidents affecting the environment.
5 Approved chemicals	Using and/or discharging offshore chemicals that are not approved under the Harmonised Offshore Chemical Notification Scheme, and included in the lists of approved offshore chemicals maintained and published by the Centre for Environment Fisheries and Aquaculture Science (Cefas)
8 Trial chemicals	Not ensuring that trial offshore chemicals are used and/ or discharged as detailed in the Permit application.
9 Maintenance of records	<p>Not maintaining a record of offshore chemicals use and discharge during the course of the operations covered by the permit.</p> <p>Not making copies of these records available to the Department upon request.</p> <p>Not retaining copies of these records for a minimum of 1 calendar year following submission of the permit returns.</p>
11 Check monitoring	Failure to afford the Department with such facilities and assistance to undertake an independent monitoring programme when requested to do so.

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12 Permit returns	Not submitting permit returns confirming the quantities of all chemicals used and/or discharged within 28 days of the end of each calendar quarter.
13 Permit review	Not providing the Department with any information that the Department considers necessary to undertake a Permit review
14 Permit variation	Not notifying the Department when the Permit holder becomes aware that any of the information on which the issue of the permit was based may change, or has changed. Failure to request a variation to the permit in the event that the permit holder wishes to change any of the particulars detailed in the permit application.
Other/bespoke	As detailed within the Permit

Table 9 details the OCR regulations that if breached require the submission of a OCRNCN and provides examples of the incidents that are breaches of the specified regulations:

Table 9:

Regulation	Examples of OCRNCN Reportable Incidents
3 (1) - Requirement for permit to use or discharge offshore chemicals	Use and/or discharge of an offshore chemical other than in accordance with the terms of and conditions attached to a permit.
6 (2) - Requirements relating to permit applications	Not providing reasonable evidence to verify any information provided in a permit application or not providing information for the purposes of properly considering a permit application when required to do so by virtue of notice from the Department.
7 (1) - Publicity for permit applications	Where required, not making a copy of the permit application available for public inspection or failure to publicise a notice in such newspapers on such occasions as to be likely to come to the attention of any persons likely to be interested in, or affected by, the use or discharge of chemical.

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7 (3) - Publicity for permit applications	Not supplying a copy of the permit application as required.
15 (1A) - Provision of information to the Secretary of State	<p>Failure to provide specified information to the Secretary of State concerning an incident resulting in a release or the use and/or discharge of offshore chemicals save in accordance with the terms and conditions attached to a permit.</p> <p>Any release of offshore chemicals from an offshore installation must be reported in accordance with the PON1 guidance (which includes directions from the Secretary of State as to the form and manner of the information required). Should any such release not be reported in accordance with the PON1 guidance it is a breach of the requirements of OCR Regulation 15 (1A) (b) and (in cases where there is a permit) a breach of the permit conditions and therefore must be reported as OCRNCN.</p> <p>Any use and/or discharge of offshore chemicals from an offshore installation that occurs when there is no approved chemical permit constitutes a breach of OCR Regulation 3(1). Any such unpermitted use and/or discharge must be reported on an OCRNCN. The information required on an OCRNCN constitutes the directions from the Secretary of State as to the form and manner of the information required in the event of such use and/or discharge of offshore chemicals as per OCR Regulation 15(1A)(a).</p> <p>Note - In the event that there any use and/or discharge of offshore chemicals from an offshore installation and there is an approved chemical permit in place for the offshore installation but the offshore chemicals used and/or discharged are not detailed in the permit this is reportable as an OCRNCN by</p>

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	virtue of Condition 2 of the Chemical Permit (as per Table 8 above).
Other	To notify the Department of another breach of the Regulations

7.4 Timeframe for OCRNCN submissions

The Permit Holder must submit a completed OCRNCN form on IRS within 2 working days of the identification of the non-compliance.

Note – if a NCN cannot be submitted via IRS then this should be done by emailing a copy of a completed OCR NCN proforma to OPRED@energysecurity.gov.uk. A copy of the proforma can be found [here](#)

7.5 Ongoing OCRNCN

OCRNCNs are considered to be ongoing if the non-compliance has not been addressed prior to submission of the NCN, an example may include an ongoing non-compliant discharge of chemicals.

Any OCRNCN reporting the ongoing non-compliant discharge of subsea hydraulic fluid from the location intended to discharge hydraulic fluid must be updated every 24 hours unless directed otherwise by an OPRED Inspector.

8.0 PPC NCN

8.1 Legislative Background

The Offshore Combustion Installations (Pollution Prevention and Control) Regulations 2013 (as amended) 'PPC Regulations' provide limitations on certain pollutant emissions into the air.

8.2 PPC Guidance

An PPCNCN is the method used to report breaches of a PPC Permit Conditions.

In addition the Department expects that a PPCNCN is submitted to report any breach of the relevant conditions of the PPC Regulations.

There is specific PPC guidance which can be found [here](#)

8.3 Requirement for an PPC NCN submission

A PPC NCN must be submitted if there breaches of the Conditions of a PPC Permit (Schedule I or Schedule II)

Table 10 details the PPC Schedule I permit conditions that if breached require the submission of a PPCNCN and provides examples of incidents that are breaches of the specified permit conditions:

Table 10:

Condition	Examples of PPCNCN Reportable Incidents
1. Location of Installation	Installation name/identifier or location not as per Permit.
2. Combustion equipment authorised under the permit	Equipment name and model, tag/facility number, type of equipment (including primary purpose), max rated output or max thermal input not as per Permit.
3. Total annual emissions of polluting substances from combustion equipment authorised under the permit	Exceedance of annual permitted mass emissions for any polluting substances detailed in the permit.
Other / bespoke	As per permit

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Table 11 details the PPC Schedule II permit conditions that if breached require the submission of a PPCNCN and provides examples of incidents that are breaches of the specified permit conditions:

Table 11:

Condition	Examples of PPCNCN Reportable Incidents
1. Permit Validity	Emission of polluting substances out with the approved start and or end date.
2. Prevention of Pollution (a)	<p>Not ensuring that appropriate measures are taken to minimise discharges, emissions and waste, in particular through the appropriate use of</p> <p>technology including the application of the best available techniques.</p> <p>Not ensuring that necessary measures are taken to prevent incidents affecting the environment or, where they occur, to limit their consequences in relation to the environment.</p>
2. Prevention of Pollution (b)	Not ensuring that that any liquid or solid wastes arising from the operation of the combustion equipment authorised under the permit are, so far as is practicable, recovered for onshore recycling or disposal, or disposed of offshore (subject to necessary disposal permits/consents)
2. Prevention of Pollution (c)	<p>Not informing the Department or appropriate body of any incident or accident which may significantly affect the environment.</p> <p>Not ensuring that measures are taken to limit the environmental consequences and prevent incidents or accidents.</p>
2. Prevention of Pollution (d)	Not ensuring that all necessary measures are taken to avoid any risk of pollution arising as a consequence of any decommissioning operation or the removal of the offshore combustion equipment when operations cease.
3. Maintenance of Records	<p>Not maintaining records of fuel use, fuel composition, running hours and running loads for the combustion equipment authorised under the permit.</p> <p>Not making copies of these records available to the Department upon request or retaining these for a minimum</p>

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	period of 10 years following submission of the Permit returns.
5. Check Monitoring	Not providing the Department with facilities and assistance to undertake an independent monitoring programme
6 Monitoring (a)	Not undertaking a monitoring survey to determine the levels of polluting substances in the emissions from the combustion equipment authorised under the permit; to determine the suitability of the emission projections that form the basis of the total permitted annual emissions and the suitability of the emission factors used to calculate the total annual emissions of polluting substances, when directed to do so by the Department.
6 Monitoring (b)	Not agreeing the monitoring survey with the Department.
6 Monitoring (c)	Not submitting copies of the monitoring survey to the Department within three months of completion of the survey.
7 Energy Audit (a)	Not undertaking or commissioning an energy audit or assessment to quantify the total energy use on the combustion installation and the energy consumption by specific equipment or processes, when directed to do so by the Department.
7 Energy Audit (b)	With regards to the energy audit or assessment not including a cost benefit analysis for the replacement of existing combustion equipment with more efficient combustion equipment and/or the replacement of equipment or the use of abatement technology to reduce the emissions of pollutant substances.
7 Energy Audit (c)	Not providing a report detailing progress in relation to the proposed replacement of existing combustion equipment and/or the use of abatement technology.
7 Energy Audit (d)	Not providing copies of the energy audit or assessment reports, cost benefit analysis reports and progress reports to the Department within agreed deadlines.
8 Permit Returns	Not submitting a permit return confirming the emissions from the combustion equipment authorised under the permit.

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9 Permit Review	Not providing the Department with any information that the Department considers necessary to undertake a Permit review
10 Permit Variation	Not notifying the Department when the Permit holder becomes aware that any of the information on which the issue of the permit was based may change, or has changed.
Other / bespoke	As per permit

Table 12 details the PPC regulations which if breached result in the Department expecting that a PPCNCN is submitted and provides examples of incidents that are breaches of the specified permit conditions:

Table 12:

Regulation	Examples of incidents were a PPCNCN submission is expected.
3 Permits	Operating an offshore combustion installation without a permit or otherwise than in accordance with the conditions in that permit.
11B (2) - Emission limit values: medium combustion plant	Exceeding the emission limit value of sulphur dioxide, NOx or dust from a new medium combustion plant.
11B (3) - Emission limit values: medium combustion plant	From 1 January 2025 exceeding the emission limit value of sulphur dioxide, NOx or dust set out in Tables 2 and 3 of Part 1 of Annex 2 from an existing medium combustion plant with a rated thermal input greater than 5 megawatts.
11B (4) - Emission limit values: medium combustion plant	From 1 January 2030 exceeding the emission limit value of sulphur dioxide, NOx or dust set out in Tables 1 and 3 of Part 1 of Annex 2 from an existing medium combustion plant with a rated thermal input of 5 megawatts or less.
11C (1) - Limited operating hours: existing medium combustion plant	For a new medium combustion plant which operates for no more than 500 operating hours per year, as a rolling average over a period of five years, not complying with the emission limit values set out in Part 1 of Annex 2 during that period of five years, where the operator has not signed a declaration in accordance with

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	paragraph 7 of Annex1 before the start of that period of five years.
11D - Limited operating hours: new medium combustion plant	For a new medium combustion plant which operates for no more than 500 operating hours per year, as a rolling average over a period of three years, not complying with the emission limit values set out in Part 2 of Annex 2 during that period of three years, where the operator has not signed a declaration in accordance with paragraph 7 of Annex1 before the start of that period of three years.
11E (1) - Temporary derogations: medium combustion plant	Being unable to comply with the relevant emission limit values for sulphur dioxide in regulation 11B, because of an interruption in the supply of low-sulphur fuel resulting from a serious shortage and NOT requesting a temporary derogation from the requirement to comply with those emission limit values.
11E (3) - Temporary derogations: medium combustion plant	A medium combustion plant using only gaseous fuels that resorts exceptionally to the use of other fuels because of an interruption in the supply of gas, resulting from a serious shortage, that is not equipped with secondary abatement equipment in order to comply with those emissions limit values.
11F - Simultaneous use of fuels: medium combustion plant	Where a medium combustion plant simultaneously uses two or more fuels, not calculating the emission limit value for each pollutant by; <ul style="list-style-type: none"> • taking the emission limit value relevant for each individual fuel as set out in Annex 2; or • determining the fuel-weighted emission limit value, which is obtained by multiplying the individual emission limit value referred to in paragraph (a) by the thermal input delivered by each fuel, and dividing the product of multiplication by the sum of the thermal inputs delivered by all fuels; or • aggregating the fuel-weighted emission limit values.
12 (2) - Variation of operation of offshore combustion installations	Putting into effect the proposed variation before receiving a notice approving the variation.

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12B (1) - Variation of operation of medium combustion plant	<p>Failure to provide notice to the Secretary of State where a variation is proposed to the operation of a medium combustion plant</p> <p>Failure to provide information as the Secretary of State requests in order that the Secretary of State may consider whether or not to approve any variation.</p>
12B (2) - Variation of operation of medium combustion plant	Putting into effect the proposed variation before receiving a notice approving the variation.
18 (3) - Assignments	Where a permission notice is given and the permit is assigned within the time period specified in that notice, the assignor and assignee NOT giving notice to the Secretary of State as soon as possible of the completion of the assignment and the date it complete.
23 (3) - Information notices and reporting	<p>Not reporting to the Secretary of State as soon as possible</p> <ul style="list-style-type: none"> • planned changes in the nature, functioning or extension of an offshore combustion installation which may have consequences for the environment; or • any accident or incident affecting an offshore combustion installation which has or may have a significant negative effect on the environment; or • any breach of the conditions in the permit.
Other	As required to report any other breach of the PPC Regulatory requirements.

8.4 Timeframe for PPC submissions

All PPC Submissions must be reported within 2 working days of identification.

Note – if a PPC NCN cannot be submitted via IRS then this should be done by emailing a copy of a completed PPC NCN proforma to OPRED@energysecurity.gov.uk. A copy of the proforma can be found [here](#)

8.5 Ongoing PPC NCN

PPCNCNs are considered to be ongoing if the non-compliance has not been addressed prior to submission of the NCN, an example may include an ongoing unpermitted emission of NO_x/SO_x etc.

There is no requirement to update an ongoing PPC NCN at a specified frequency unless directed to do so by an OPRRED Inspector.

9.0 F-Gas/ODS NCN

9.1 Legislative Background

REGULATION (EU) No 517/2014 'F-Gas Regulations' are a set of regulations that aim to reduce F-Gas use and prevent releases of F-Gases into the atmosphere

REGULATION (EC) No 1005/2009 'ODS Regulations' are a set of regulations that control the use of and trade in ozone depleting controlled substances.

The Fluorinated Greenhouse Gases Regulations 2015 (as amended in 2018, 2019 & 2020) and the Fluorinated Greenhouse Gases Regulations (Northern Ireland) 2015 (as amended in 2018, 2019 & 2020) enforce the provisions of the EU F-Gas Gases Regulation (517/2014) in Great Britain and Northern Ireland.

The European Union Withdrawal Act 2018 retained the EU's F-Gas and ODS legislation in its entirety in UK law, with the retained EU law applying after the Transition Period. In order to address certain inoperability's arising from the wording of the retained legislation (e.g. references to the Commission) The Ozone-Depleting Substances and Fluorinated Greenhouse Gases (Amendment etc.) (EU Exit) Regulations 2019 deals with such interoperability. The Ozone-Depleting Substances and Fluorinated Greenhouse Gases (Amendment etc.) (EU Exit) Regulations 2020 address matters arising out of or related to the Protocol on Ireland/Northern Ireland in the EU withdrawal agreement.

9.2 F-Gas/ODS Guidance

A F-Gas/ODS Non-Compliance Notification (F-Gas/ODSNCN) is the method used to report all releases of F-Gas/ODS to the atmosphere greater than 250 tonnes CO₂ equivalent.

In addition an F-Gas/ODSNCN is the method to report any breach of an Article of the F-Gas Regulations. While the F-Gas/ODSNCN has been tailored to allow the reporting of any breach of the F-Gas Regulations the F-Gas/ODSNCN is to be used to report any breach of the Articles of the ODS Regulations using the 'other' option.

There is specific F-Gas guidance which can be found [here](#)

There is specific ODS guidance which can be found [here](#)

9.3 Requirement for a F-Gas/ODS NCN submission

A F-Gas/ODSNCN must be submitted if there is a release greater than 250 tonnes CO₂ equivalent.

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In addition the Department expects that a F-Gas/ODSN CN is submitted to report any breach of the relevant Articles of the F-Gas/ODS Regulations.

Table 13 details the requirements of the EU F-Gas Gases Regulations which if breached result in the Department expecting a F-Gas/ODSN CN is submitted and provides examples of the incidents that are considered breaches of the F-Gas/ODS regime.

Table 13

Article	Examples of incidents where the Department expects the submission of a F-Gas/ODSN CN
3 (1) - Prevention of emissions of fluorinated greenhouse gases Location of Installation	Intentionally releasing fluorinated greenhouse gases into the atmosphere where the release is not technically necessary for the intended use of the system
3 (2) - Prevention of emissions of fluorinated greenhouse gases	Not taking precautions to prevent the unintentional release ('leakage') of F-Gases. Not taking measures which are technically and economically feasible to minimise leakage of F-Gases.
3 (3) - Prevention of emissions of fluorinated greenhouse gases	Not ensuring that equipment is repaired without undue delay where there is a release of F-Gases. Where equipment is subject to leak checks, and a leak in the equipment has been repaired, not ensuring that the equipment is checked by a certified person within one month after the repair.
3 (4) - Prevention of emissions of fluorinated greenhouse gases	Not ensuring that personnel who undertake leak testing are appropriately certified as detailed in the Department's F-Gas guidance Not ensuring that personnel who undertake leak testing take precautionary measures to prevent leakage of F-Gases.
4 (1) - Leak Checks	Not ensuring that appropriate equipment is leak checked at the required frequency as detailed in the Department's F-Gas guidance
4 (2) - Leak Checks	Not ensuring that leak tests undertaken by certified personnel.
4 (3) - Leak Checks	Not ensuring that leak tests are undertaken at the frequency as detailed in the Department's F-Gas guidance.

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4 (4) - Leak Checks	Not implementing the required inspection regime for relevant fire protection equipment containing F-Gas.
5 (1) - Leakage detections Systems	Not ensuring that stationary refrigeration equipment, stationary air-conditioning equipment, stationary heat pumps or stationary fire protection equipment containing F-Gases in excess of 500 tonnes CO2 equivalent or more is provided with a leakage detection system which alerts the operator or a service company of any leakage (An Automatic Leak Detection System – ALDS)
5 (2) - Leakage detections Systems	Not ensuring that electrical switchgear containing F-Gases in excess of 500 tonnes CO2 equivalent or more is provided with a ALDS
5 (3) - Leakage detections Systems	Not ensuring that leakage detection systems associated with stationary refrigeration equipment, stationary air-conditioning equipment, stationary heat pumps or stationary fire protection equipment are checked at least once every 12 months to ensure their proper functioning
5 (4) - Leakage detections Systems	Not ensuring that leakage detection systems associated with relevant electrical switchgear are checked at least once every 6 years to ensure their proper functioning
6 (1) - Record keeping	Not ensuring that records are kept (as per the Department's) Guidance document for equipment which is required to leak tested.
6 (2) - Record keeping	Not retaining the records required above for a minimum of five years.
6 (3) - Record keeping	Not ensuring the records of relevant of information are retained regarding the purchasers of F-Gas (applicable only to those undertakings supplying F-Gas)
8 (1) - Recovery	Not ensuring that F-Gases not contained within foams are recovered by trained personnel
8 (2) - Recovery	Not ensuring the recovery of residual F-Gases from containers prior to the container being recycled, reclaimed or destroyed.
10 (11) - Training and certification	Not taking reasonable steps to ensure that those undertaking the installation, servicing, maintenance, repair or decommissioning of the equipment or leak checks of the equipment or recovery of F-Gases hold the appropriate certificates.

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13 (3) - Control of use	Using a F-Gas with a GWP of 2500 tonnes CO2 equivalent to service or maintain refrigeration equipment with a charge size of 40 tonnes CO2 equivalent.
20 - Collection of emissions data	Not recording emissions data as detailed in the Department's F-Gas Guidance Document.
Other	Used to report any other incidents which constitute breaches of the F-Gas/ODS Articles.

9.4 Timeframe for F-Gas/ODS NCN submissions

All F-Gas/ODS NCN Submissions are expected to be submitted within 2 working days of incident identification.

Note – if a NCN cannot be submitted via IRS then this should be done by emailing a copy of a completed PPC NCN proforma to OPRED@energysecurity.gov.uk. A copy of the proforma can be found [here](#)

9.5 Ongoing F-Gas/ODS NCN

F-Gas/ODS NCNs are considered to be ongoing if the non-compliance has not been addressed prior to submission of the NCN, an example may include an ongoing release of F-Gas.

There is no requirement to update an ongoing F-Gas/ODS NCN at a specified frequency unless directed to do so by an OPRRED Inspector.

10.0 General NCN

10.1 Legislative Background

IRS has been designed with bespoke pages to allow the reporting of breaches of the most common Regulations/Permits/Consents/PONs. To allow for the reporting of any other breach of the regulatory offshore oil and gas environmental regime as administered by the Department the 'General NCN' has been created.

10.2 Guidance

A General NCN should be used to report a breach of Regulation/Permit/Consent/Licence etc where there is no dedicated page on IRS.

OPRED's website contains a range of guidance which can be found [here](#)

10.3 Requirement for a General NCN submission

A General NCN must be submitted if there is a breach of any Regulations/Permits/Consents/PONs administered by OPRED and there is not a dedicated page to do so within IRS.

10.4 Timeframe for a General NCN submissions

All General NCN Submissions must be reported within 2 working days of identification.

Note – if a General NCN cannot be submitted via IRS then this should be done by emailing details to OPRED@energysecurity.gov.uk.

10.5 Ongoing General NCN

A General NCNs is considered to be ongoing if the non-compliance has not been addressed prior to submission of the NCN.

There is no requirement to update an ongoing General NCN at a specified frequency unless directed to do so by an OPRED Inspector.

This publication is available from: <https://www.gov.uk/guidance/oil-and-gas-environmental-alerts-and-incident-reporting#reporting-incidents-to-opred>

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