



Offshore Petroleum Regulator
for Environment & Decommissioning

**Offshore Petroleum Regulator for
Environment & Decommissioning**

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Dear Sir / Madam,

OSPAR: Annual Reporting Relating to Chemical Goals

The Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) submitted a report to the OSPAR Offshore Industry Committee (OIC) in 2021 in relation to the following Recommendations:

- a) OSPAR Recommendation 2005/2 on Environmental Goals for the Discharge by the Offshore Industry of Chemicals that Are, or Contain Added Substances, Listed in the OSPAR 2004 List of Chemicals for Priority Action; and
- b) OSPAR Recommendation 2006/3 on Environmental Goals for the Discharge by the Offshore Industry of Chemicals that Are, or Which Contain Substances Identified as Candidates for Substitution.

Recommendation 2005/2 requires that OSPAR Contracting Parties should have phased out the discharge of offshore chemicals that are, or which contain added substances, listed as the Chemicals for Priority Action by 1 January 2010. The UK had previously reported full compliance with the goal of phasing out the discharge of Chemicals for Priority Action. The UK continues to report against the goals of the Recommendation and this data is obtained from the annual chemical goals reports and the EEMS returns.

Recommendation 2006/3 requires that, as soon as practicable and no later than 1 January 2017, Contracting Parties should have phased out the discharge of offshore chemicals that are, or which contain substances, identified as candidates for substitution, except for those chemicals where, despite considerable efforts, it can be demonstrated that this is not feasible due to technical or safety reasons.

At OIC in 2018 it was acknowledged that there has been a reduction in the use and discharge of offshore chemicals listed as candidates for substitution since 2006 but the Recommendation goals were not fully achieved. OIC agreed that reporting requirements should continue, and as part of ongoing reporting requirements, Contracting Parties submitted reports to the OIC in 2021 outlining those chemicals where discharges have been phased out, and those chemicals where, despite considerable efforts, it has not been possible to phase out the discharges. A report reviewing the implementation of OSPAR Recommendation



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2006/3 was submitted to OIC in 2024 and made several recommendations to strengthen the implementation of the Recommendation, including recommendations related to technical justifications.

Operators are therefore required to prepare an Annual Report relating to chemical use and discharge of candidates for substitution during drilling, production, work-over/intervention, pipeline and decommissioning operations during 2024, using the Excel Annual Report spreadsheets. In addition to the Annual Report spreadsheets, operators are also required to prepare an Excel Technical Justification Report (TJR) spreadsheet for all chemicals identified as Chemicals for Priority Action or Candidates for Substitution that are still being used and/or discharged on the UKCS. Considering the implementation report submitted to OIC in 2024, we are also requesting that **all TJRs previously submitted are reviewed and updated as part of the Annual Reporting process for 2024**. Operators must complete the Excel Annual Report and Technical Justification Report spreadsheets and return the completed spreadsheets to OPRED@energysecurity.gov.uk by **28 February 2025**.

Copies of the spreadsheets can be downloaded from the website, currently located at:

<https://www.gov.uk/oil-and-gas-offshore-environmental-legislation#the-offshore-chemicals-regulations-2002-as-amended>

In addition to the Annual Report spreadsheets, operators are also requested to provide **all** reports of any trials that have been undertaken to potentially replace chemicals identified as Chemicals for Priority Action or Candidates for Substitution, irrespective of whether those trials have been successful. Such reports must be sent to OPRED@energysecurity.gov.uk by **28 February 2025**.

To assist with the reporting process, please read the guidance relating to completion of the spreadsheets for the Annual Reports and the Technical Justification Reports, which is appended to this letter.

If you have any queries or concerns in relation to the above, please contact your assigned Environmental Manager or email OPRED@energysecurity.gov.uk.

Yours faithfully

Mark Shields
Environmental Management Team

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OSPAR: Annual Reporting Relating to Chemical Goals

Guidance

Completion of Annual Report Spreadsheets

There are two Annual Report Spreadsheets, one for production (life) chemical permits (PRAs), and one for term chemical permits (DRAs, WIAs, PLAs and DCAs).

Each spreadsheet contains two worksheets:

- i) one for Chemicals for Priority Action or Candidates for Substitution that are no longer used or have been replaced during the period of the report; and
- ii) the other for Chemicals for Priority Action or Candidates for Substitution that are still used and have not been removed or replaced.

Both worksheets *must* be completed and if necessary, recording a 'Nil' return.

1. Separate copies of the production (life) annual reporting spreadsheet must be completed for **each** installation that is the subject of a PRA.
2. Separate copies of the term chemical permit spreadsheet must be completed for:
 - **All** drilling operations undertaken during 2024 covered by a DRA;
 - **All** work-over / intervention operations undertaken during 2024 covered by a WIA;
 - **All** pipeline works operations undertaken during 2024 covered by a PLA; and
 - **All** decommissioning operations undertaken during 2024 covered by a DCA.

It is not necessary to list individual term permits under each chemical permit type (i.e. do not list multiple individual DRA references); however, if a chemical is used for different categories of operation (e.g., drilling *and* work-over operations) it should be included in both relevant spreadsheets.

To enable OPRED to compile information for OSPAR implementation reporting for each category of operation, where chemicals have been used in one chemical permit type (i.e. on a DRA, WIA, PLA or DCA) but also used in a production (life) chemical permit (PRA), then this should be clearly indicated in the 'Comments' column alongside the entry in the PRA Annual Report spreadsheet.

All Chemicals for Priority Action and Candidates for Substitution used and/or discharged during 2024, irrespective of whether there is 'Continuous' or 'Batch' use, or whether there is any discharge to the marine environment, must be provided to assist with the OSPAR implementation reporting. The use and/or discharge section includes a drop-down menu and must be completed for **all** Chemicals for Priority Action and Candidates for Substitution included on a chemical permit in 2024.

Any trials that have been undertaken to identify alternatives (including any physical modification to process facilities to eliminate use or substitution with alternative chemicals) during 2024 must also be included in the returns. Where trials have led to the removal or replacement of a chemical, this should be recorded in the worksheet relating to chemicals that **have** been removed or replaced; and where trials have not led to the removal or replacement of a chemical, this should be recorded in the worksheet relating to chemicals that **have not** been removed or replaced.

In addition to detailing trials information within the spreadsheet, operators are also requested to append written reports on all trials that have been undertaken, irrespective of whether those trials have been successful.

To simplify completion of the returns, several fields have been allocated drop-down menus. If more than one option is relevant, this should be recorded in the 'Comments' column in the return.



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The 'chemical name' should be recorded **exactly** as it appears within the relevant PRA/DRA/WIA/PLA/DCA. Please note, a 'Chemical supplier' column has been added to the spreadsheet and must also be completed to enable a cross-reference check with the 'chemical name' to be made.

Technical Justification Requirements

The TJR spreadsheet must be provided to support the Annual Report, for **all** Chemicals for Priority Action or Candidates for Substitution and covering all chemical permit applications for those offshore chemicals. For 2024 reporting we are expecting previously submitted TJRs to be reviewed and updated. A TJR should be provided even if a listed Chemicals for Priority Action or Candidates for Substitution included on a **chemical permit** during 2024 was not used or discharged, or it was replaced or removed from a permit during 2024.

Completion of Technical Justification Report (TJR) Spreadsheet

There is one Technical Justification Report spreadsheet, which can be used to cover all chemical permits (PRAs, DRAs, WIAs, PLA and DCAs). The spreadsheet contains multiple worksheets (P1, P2, P3, etc.), and information relating to each Chemical for Priority Action or Candidate for Substitution included in a chemical permit during 2024 should be included on a separate worksheet.

To simplify completion of the returns, several fields have been allocated drop-down menus. If more than one option is relevant, this should be recorded in the 'Other information' row in the relevant section of the return.

To add additional worksheets to the TJR spreadsheet, right click on the P1 worksheet tab and select 'Move or Copy'. In the box that appears, scroll down and highlight '(Move to end)' and tick 'Create a copy' followed by 'OK'. Following these instructions will generate a new worksheet containing all the functionality of the P1 worksheet.

The TJR should:

- identify the offshore chemical;
- explain the functions and applications of the offshore chemical and/or substance;
- confirm why it is considered necessary to continue to use and/or discharge the offshore chemical and/or substance and relate it to process requirements e.g., safety, efficacy, environmental benefits, legislative compliance benefits, cost considerations, etc.; and
- provide a summary of any trials undertaken to reduce or eliminate use and/or discharge and the outcomes of those trials. **A copy of a written report of the trial should be appended to the TJR.**

As indicated above, when you have submitted a TJR for a chemical that includes a proposed application detailed in a chemical permit application, it will no longer be necessary to replicate this information in the chemical permit application. However, it will be necessary to prepare a new TJR to supplement an existing TJR if there are any changes in the information during the period of an annual report.

Risk-based Justifications

Following submission of a TJR spreadsheet, it should be referenced in relevant chemical permit applications, and the justification included in the PRA/DRA/WIA/PLA/DCA should concentrate on the specific conditions of use and/or discharge detailed in the application to determine the **risk**.

A risk-based justification should concentrate on factors such as:

- the total quantity of the offshore chemical and/or substance that will be used and/or discharged;



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- the fate of the offshore chemical and/or substance;
- the potential impact of the offshore chemical and/or substance in the receiving environment;
- the supporting modelled risk assessment (HQ v RQ, OA if appropriate); and
- any factors that would reduce the risk (e.g., dispersion, dilution, batch discharge, etc.).

The risk-based justification should represent a significant reduction in the application preparation workload, e.g., zero discharge chemicals will probably only require confirmation of the fate of the chemical and that the environmental impact relating to the use would therefore be negligible.