Offshore Petroleum Regulator
for Environment & Decommissioning

OPPC Guidance – Consultation Supporting Document – Summary of Key Changes

This document is designed to support the wider consultation of the new OPRED OPPC Guidance.

It is not intended to be referenced in isolation and is not considered to form part of the amended OPPC Guidance. Readers should refer to this document in conjunction with their initial review of the updated OPPC Guidance and the aim is to highlight the key content and significant changes within the amended guidance and provide additional clarification where deemed necessary.

The key content (and where appropriate changes) in the updated OPPC Guidance are as follows:

Section 5.4 – Requirement to submit an ECE Environmentally Critical Elements (ECE) Identification and Management Strategy:

Key Content: The previous requirement for an ECE Identification and Management Strategy to be described within Permit applications has been removed. It remains a Permit requirement to manage maintenance effectively to aid compliance with the Permit and Regulations.

Please note Permit Holders that have previously established processes for the identification and management of ECE may still utilise this strategy to demonstrate to OPRED how maintenance of relevant plant and equipment is being managed more effectively.

Sections 5.6 - Applications Subject to Public Notice:

Key Content: More comprehensive guidance has been provided on applications subject to public notice including the obligations on making the document available, the information contained within a public notice and under what circumstances an application is, or is not, subject to the public notice provisions of the regulations.

Appendix A - Discharges / Activities Requiring an Oil Discharge Permit – A1 - System – Production - A 1.7

Key Content: The guidance has been amended to state that the point of discharge for a produced water discharge stream is considered to be **out of** a caisson. Previously the point of discharge was considered to be **into** the caisson. This change has been made to align produced water discharge streams with other discharge streams included within an oil discharge permit.

Appendix A - Discharges / Activities Requiring an Oil Discharge Permit – A4 System – Drainage

Key Content: The document has been updated to provide a detailed definition of recoverable and non-recoverable drains systems, it also states that the Department does not consider that the system intent of non-recoverable drainage systems is to discharge oil. Furthermore the guidance explains who should apply for Permit Applications to cover oil discharges from recoverable drainage systems on Non-Production Installations (NPIs) during well operations and gives examples of the approach for NPI drainage systems.

Significant Changes: With regards to oil, non-recoverable drainage systems have no ability to separate, recover and minimise oil emissions to sea. All oil that enters these drains will simply pass directly to sea. This includes non-recoverable sections of recoverable drainage systems (top-hats,

storm drains etc). As such non-recoverable drains will no longer be a permitted discharge point for oil.

Permit Applications to cover oil discharges from recoverable drainage systems on Non-Production Installations (NPIs) during well operations should be submitted by the Well Operator who has contracted the NPI to undertake the well operation.

Permit Applications to cover oil discharges from recoverable drainage systems on NPIs undertaking oil and gas activity other than well operations should be discussed on a case by case basis with the relevant assigned OPRED environmental inspector in advance of any application submission.

Appendix A - Discharges / Activities Requiring an Oil Discharge Permit – A5 System - Sand and Scale (Online and Offline)

Key Content: The document has been comprehensively expanded to provide clearer guidance on the management of accumulated sand and/or scale, specifically definitions and examples of what are considered to be online and offline sand/scale systems, expectations of how the direct wash water wash water will be managed and expansion of sampling/analysis requirements including circumstances where there is insufficient quantities of sand to perform oil on sand concentration analysis as per the BEIS Methodology.

Appendix B – Oil Discharges to Sea which are Exempt under these Regulations – B3 - Oil Discharges from Machinery Spaces Drainage and Produced Oil Tanks

Key Content: The document has been extensively updated following the Merchant Shipping (Prevention of Oil Pollution) Regulations 2019 (MSPOP) coming into force.

The guidance explains that discharges of Machinery Space Drainage or Seawater containing residual oil from produced oil tanks can be regulated under the MSPOP regulations or the OPPC regulations. The guidance explains under what circumstances which regulatory regime is applicable.

Significant Changes: With regards to Machinery Space Drainage or Seawater containing residual oil from produced oil tanks from a fixed or floating production platforms which cannot propel themselves through water or from FPSOs and FSUs (for discharges made through the production stream) **the OPPC regulations apply**.

With regards to Machinery Space Drainage or Seawater containing residual oil from produced oil tanks from fixed or floating production platforms which can propel themselves through water, NPIs or FPSOs/FSUs (for discharges not made through the production stream) **the OPPC regulations do not** apply, the MSPOP regulations do apply.

Now that the MSPOP regulations allow for certain offshore installations to be excluded from certain aspects of the regime there no longer exists the requirement for a UKOPP certificate has been issued by the MCA.