

## Annual Well Intervention well campaign applications and annual review of Production Permits: a reminder to Industry

5<sup>th</sup> September 2025

### Annual Well Intervention Application (WIA) well campaign – chemical permit (CP)

A yearly application to undertake a WIA well campaign is informally referred to as an ‘Annual WIA’ chemical permit, and Permit Holders need to submit these to OPRED each year for the following year’s WIA campaign of works. The Annual WIA well campaign CP application is an exercise that OPRED undertakes every year. Usually, the annual WIA CP timeframe is from January to December. This timeframe is set up to allow OPRED to meet its OSPAR reporting obligations.

For activities being undertaken on multiple wells during the same calendar year, the permit will always expire on 31st December. However, if the permit does not need to commence on the 1<sup>st</sup> January of the same calendar year, the permit can be applied for anytime during that calendar year. If the well activities need to continue into a new calendar year, then the Permit Holder should apply for a new permit and must have that permit approved prior to the commencement of the new calendar year.

The deadline for submission is by Friday 14th November 2025 meaning that an operator can submit their Annual WIA any time prior to this deadline. Submitting a permit application by the deadline should allow sufficient time for the consultation, review and determination process of the application to be completed by OPRED before 1st January 2026 on the basis that minimal comments are raised. Should any comments be raised during the review process, Permit Holders are reminded that these should be addressed promptly, if the permit is required for the 1<sup>st</sup> January 2026.

### Information to note

- An annual WIA chemical permit requires a new Chemical Permit SAT to be submitted under a new WIA MAT. The WIA MAT and Environmental Assessment Justification (EAJ) document that forms the basis of the 2025 chemical permit must not be used for the 2026 permit application. However, for ongoing campaigns there will no doubt be substantial overlap between the documents.
- Each WIA permit application for multiple wells must identify which wells are planned to be worked on and outline what activities will be undertaken on which wells. This information must be captured in the EAJ, and where applicable in the Project Information section in the MAT.
- The contents of the EAJ should be proportional to the proposed activities and operators should be mindful under which legislation the permit has been submitted.

## Annual review of Production Application (PRA) chemical permits

The Annual PRA exercise is undertaken every year, whereby Permit Holders submit a variation to their PRA to include their proposed chemical use/discharge data for the following year or to review the following year's data should that year already be listed in the SAT. The deadline for submission is by Friday 14th November 2025. Submitting a permit application by the deadline should allow sufficient time for the consultation, review and determination process of the chemical permit variations to be completed by OPRED. Should any comments be raised during the review process, operators are reminded that these should be addressed promptly to avoid the potential for any delays to approval.

A PRA chemical permit variation must include offshore chemical use and/or discharge for the next year of operations (2026) and it is at the Permit Holder's discretion whether to include a forecast for two additional years of chemical use and discharge in the SAT. The Permit Holder must ensure that the use and discharge of chemicals for the next calendar year (2026) have been approved prior to the 1<sup>st</sup> January of that year.

### Information to note

- If approval for chemical use and discharge has not been obtained prior to the 1<sup>st</sup> January for ongoing activities, then the Permit Holder will be considered as undertaking activities without the chemicals being approved on the permit and therefore may be subject to investigation and enforcement action.
- When submitting the variation to the PRA to include additional years, if there are no changes to chemical use, discharge and associated modelling from the previous year i.e. the 2026 chemical data is an exact copy of the 2025 data, then the variation to add the 2026 data can be submitted in the usual timeframe (approximately three working days before approval is required). In such circumstances the Permit Holder should confirm, in the Change Summary, that there is no change between 2025 and 2026 for chemical use, discharge and associated modelling.
- Should an operator copy and paste the chemical data from the previous year, please ensure that the OCNS registration of all offshore chemical products has not expired. If the OCNS registration of a chemical product has expired, then the operator must remove the chemical product from the 2026 data unless proof of recertification or proof of existing stocks within their ownership can be provided.
- It is expected that the PRA EAJ is also reviewed at this time by the Permit Holder to ensure that the contents is still accurate, that the operations described and assessed are still relevant and that the environmental information is up to date. Any amendments made to any of the PRA documents must be highlighted prior to submission to OPRED.
- Please note that the Department will not expedite the approval process for any variations submitted after Friday 14th November 2026 and Permit Holders therefore risk enforcement action if they do not have an approved chemical permit that includes the use and discharge of those chemicals in 2026 by the 1<sup>st</sup> January 2026. Permit Holders are reminded to **be mindful of the national holiday period** when planning permit variations.