Offshore Petroleum Regulator
for Environment & Decommissioning

Offshore Petroleum Regulator for Environment & Decommissioning

Department for Energy Security and Net Zero
2nd Floor, AB1 Building
Crimon Place
Aberdeen
AB10 1BJ
T: +44 (0)1224 254138
E: OPRED@energysecurity.gov.uk
www.gov.uk/desnz

17 December 2025

Dear Sir / Madam,

Annual Reporting Relating to OSPAR Chemical Goals

Under OSPAR Decision 2000/2 on a Harmonised Mandatory Control System for the Use and Reduction of the Discharge of Offshore Chemicals, the UK, represented by OPRED, is required to reduce the overall impact of offshore chemicals to the marine environment by using less hazardous or non-hazardous chemicals (wherever possible).

OSPAR Recommendation 2005/2 regarding the discharge of chemicals that are or contain added substances listed in the OSPAR 2004 List of Chemicals for Priority Action (LCPA) requires that OSPAR Contracting Parties should have phased out the discharge of these offshore chemicals by 1 January 2010. The UK had previously reported full compliance with this goal of phasing out the discharge of Chemicals for Priority Action. The LCPA continues to be updated from time to time, further adding chemicals, and the UK continues to report to OSPAR against the goals of this Recommendation. Reported data is obtained from operators submitting an Annual Report to OPRED and submitting chemical permit returns information via OPRED's Environmental Emissions and Monitoring System (EEMS).

In 2006, OSPAR Recommendation 2006/3, as amended by OSPAR Recommendation 2019/02, was introduced to set an environmental goal to move towards the cessation of discharges of offshore chemicals that are, or which contain substances identified as Candidates for Substitution and such chemicals are often referred to as "substitution chemicals". Exceptions are allowed for those substitution chemicals where, despite considerable efforts, it can be demonstrated that replacement is not feasible due to technical or safety reasons.

Should a permit holder need to apply to discharge a chemical that is a candidate for substitution, the chemical application must be supported by an acceptable risk assessment and an acceptable technical justification. The technical justification must demonstrate what work has been undertaken to replace or find technical solutions to phase out the discharge of a candidate for substitution chemical. This evidence is required by OPRED to demonstrate to OSPAR that 'considerable effort' has been taken to show that it is not feasible to prevent the discharge of candidates for substitution based on technical or safety reasons. The technical

justification is submitted by an operator to OPRED in the form of a report, a Technical Justification Report (TJR).

Therefore, to assist with the OSPAR reporting process, operators are required to complete and submit the following reports to OPRED@energysecurity.gov.uk by **27 February 2026:**

1. **an Annual Report** relating to chemical use and discharge of candidates for substitution during drilling, production, work-over/intervention, pipeline and decommissioning operations during 2025, using the Excel Annual Report spreadsheets;

2. **a TJR** for all chemicals identified as Chemicals for Priority Action or Candidates for Substitution that are still being used and/or discharged on the UKCS using the Technical Justification Report Excel spreadsheet, and, if applicable,

3. **a report 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.

Copies of the report spreadsheets can be downloaded from the .GOV.UK website, currently located here.

OPRED has recently undertaken a further review of the last five years of TJRs submitted by operators, specifically the quality of information presented. It is expected that any Annual Reports and TJRs that were submitted in February 2025 capturing 2024 data, are thoroughly reviewed and updated prior to submission in 2026. For example, the entry under 'timeframe for replacement' must be reviewed noting whether the entry accurately represents the timeframe that has been reported to OPRED in previous years. **Failure to do so**, may result in the Reports being returned, and not accepted. This could potentially result in the operator not having an accepted technical justification to validate the reason(s) why a sub chemical is listed on their chemical permit.

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

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

Yours faithfully

Anna Buckingham
Environmental Management Team

Enc.

Guidance

Completion of the Annual Report Spreadsheets

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

Each spreadsheet contains **two** worksheets:

1. **Replaced Chemicals** - for those Chemicals for Priority Action or Candidates for Substitution that are no longer used or have been replaced during the period of the reporting year; and

2. **Non-Replaced Chemicals** - for those Chemicals for Priority Action or Candidates for Substitution that are still used and have not been removed from the permit or replaced with an alternative chemical.

An individual Annual Report must be submitted for **each** offshore installation that is the subject of a PRA, and an individual Annual Report must be submitted for each term chemical permit type e.g. a separate report must be submitted for:

- **All** drilling operations undertaken during 2025 covered by a DRA;
- **All** work-over / intervention operations undertaken during 2025 covered by a WIA;
- **All** pipeline works operations undertaken during 2025 covered by a PLA; and
- **All** decommissioning operations undertaken during 2025 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.

Each spreadsheet *must* be completed and if necessary, recording a **'Nil'** return.

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 term permit, but also used in a PRA life permit, 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 2025, 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 2025.

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 2025 must also be included in the reports. 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 (from the permit) 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 reports.

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

Completion of the Technical Justification Report Spreadsheet

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 type applications for those offshore chemicals. A TJR must be provided even if a listed Chemical for Priority Action or a Candidate for Substitution included on **a chemical permit** during 2025 was not used or discharged, and/or it was replaced or removed from a permit during 2025.

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 2025 should be included on a separate worksheet.

It is expected that any previously submitted reports are thoroughly reviewed and updated prior to submitting the 2025 TJR. For example, the entry under 'timeframe for replacement' should be reviewed noting whether the entry accurately represents the timeframe that has been reported to OPRED in previous years. **Failure to do so**, may result in the TJR being returned, and not accepted. This could potentially result in the operator not having an accepted technical justification to validate the reason(s) why a substitution chemical is listed on their chemical permit. **All** columns of the TJR spreadsheet must be populated accurately.

To simplify completion of the returns, several fields in the TJR spreadsheet 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;
- present a justification why it is considered necessary to continue to use and/or discharge the offshore chemical/ 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**.

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;
- 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.