Offshore Petroleum Regulator
for Environment
& Decommissioning

ENVIRONMENTAL ALERT	
ALERT NUMBER: 001/2026	**ISSUE DATE:** February 2026

INCIDENT / ALERT DETAILS:

The purpose of this Environmental Alert is to remind offshore chemical Permit holders of the requirement to include offshore chemicals used in "Open systems" in the associated chemical permit.

INITIAL/ALERT FINDINGS:

OPRED has become aware of some inconsistency of approach among offshore chemical Permit holders with regards to chemicals used in systems such as theoretically closed loop hydraulic systems, and whether they should be listed on an approved chemical permit or not.

The requirement to permit these chemicals is dependent on the system being a "Closed" or "Open" system. See below for OPRED's definitions of "Closed" and "Open" systems.

Open System

Where chemicals are used in theoretically closed-loop systems but where they may be discharged into the environment as a consequence of normal use, or where discharges into the environment cannot be excluded during use, they are considered to be used in an "open system" and the chemical(s) must be registered as an offshore chemical with Cefas and included on the associated chemical permit.

Example of an Open System

A hydraulic fluid system where hydraulic fluid is lost to the process system upstream of produced water separation. The system is considered 'open', as there is a potential for a fraction of this hydraulic fluid to be discharged into the produced water.

Closed System

A ‘closed system’ is where there are no losses or periodic discharges to the marine environment; the chemical remains within a reactor or is transferred from vessel to vessel through closed pipework. Chemicals in ‘closed systems’ do not require registration with Cefas and do not need to be included on the associated chemical permit, irrespective of whether there is a periodic requirement to refill (top-up) the system because of other losses, such as evaporation or deliberate drainage for replenishment.

Examples of a Closed System:

- A hydraulic fluid system where the hydraulic fluid is lost to the process downstream of produced water separation e.g. at export from offshore Installation to onshore terminal or tanker, and therefore there is no potential discharge to the marine environment, with any losses being exported.
- A hydraulic system where, due to contamination, the entire system requires drainage and the contents shipped to shore as waste, with no discharge to the marine environment.

Note:

- Chemicals that have not been registered as an offshore chemical, that need to be drained from closed systems for any reason, must be returned to shore for treatment and/or disposal.
- Registered offshore chemicals drained from closed systems can be permitted for discharge to the marine environment providing there is an acceptable risk assessment within the associated chemical permit application.

Further Information

Any queries relating to this alert should be addressed to:

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