



These notifications summarise key regulatory matters, to inform members of regulatory changes, or incidents which contain learning opportunities which are considered to be of interest. The information below has been provided in good faith and should be reviewed individually by recipients, who will determine its relevance to their own operations.

A number of other organisations issue regulatory notifications or similar documents which may be of interest to IMCA members. Where these are particularly relevant, these may be summarised or highlighted here. Links to known relevant websites are provided at www.imca-int.com/links. Additional links should be submitted to webmaster@imca-int.com.

Members are advised to read the source documents and to seek detailed advice from stakeholders such as the Flag Administration(s) and classification societies for their vessels where they consider that information contained in a regulatory notification is relevant to their operations. The IMCA policy and regulatory affairs team can also be contacted for further advice at info@imca-int.com.

New Portal for the UK Offshore Safety Directive Regulator

The UK Offshore Safety Directive Regulator (OSDR) has developed a Competent Authority (CA) Portal, which will be available from 1 October 2017. Any OSDR submission relating to Oil Pollution Emergency Plans (OPEP), Safety Cases (including Material Changes) or Thorough Reviews made after 1 October 2017 will have to be submitted through the CA Portal.

IMCA will attend the CA Portal tutorial session held by OSDR early in October 2017. Further guidance regarding the use of the new platform will be issued in due course.

1 Who is required to submit Oil Pollution Emergency Plans (OPEP)?

Installation operators, well operators and owners of non-production installations for all offshore oil and gas operations conducted in the territorial sea adjacent to the UK or any area designated under section 1(7) of the Continental Shelf Act 1964 must have an OPEP in accordance with requirements of the amended OPRC Regulations. The table below details who has the responsibility to submit each specific OPEP type.¹

OPEP Type	Responsibility for OPEP Submission
Onshore	Well Operator
Production Installation/ Field ('Offshore')	Installation Operator (where the Well Operator of a subsea tie-back is different to the host Installation Operator, the Well Operator may apply for a field offshore OPEO specifically for that tie-back)
Consolidated OPEP	Where the Installation Operator and the Well Operator are the same a consolidated OPEP may be submitted to cover the Tier 1, 2 and 3 responses. Where the Installation Operator and the Well Operator are different, a consolidated OPEP may be written in collaboration. In such cases the OPEP must be submitted by the Installation Operator and final approval would be issued to both the Installation and Well Operator
Temporary Operations OPEP (TOOPEP)	Well Operator
Consolidated OPEP	Tier 1, 2 and 3 responses may be consolidated into one Temporary Operations OPEP. In such cases the Consolidated Temporary Operations OPEP must be submitted by the Well Operator
Non Production Installation (NPI)	NPI owner
Communication and Interface Plan	Installation Operator (or Well Operator where operations are undertaken within a tied-back field which holds a separate Offshore OPEP)
Pipeline OPEO	Pipeline Operator

¹ Department for Business, Energy & Industrial Strategy, Guidance Notes for Preparing Oil Pollution Emergency Plans, December 2016

2 Who is required to submit Safety Cases and Thorough Reviews?

Safety cases under the Offshore Installations (Offshore Safety Directive) (Safety Case etc.) Regulations 2015 (SCR 2015) are required for all installations operating, or to be operated, in the territorial sea adjacent to the UK and any designated area within the UK continental shelf (external waters). It is an offence to operate an installation in external waters without a safety case that has been accepted by the CA. Different requirements apply to installations used for producing oil and gas compared to those used for other purposes, such as drilling, exploration or providing accommodation. The duty to submit safety cases and notifications is generally placed on a single duty holder in respect of each type of installation, namely the operator of a production installation and the owner of a non-production installation.

In addition, the duty holder must carry out a thorough review of the current safety case at least every five years or as directed by the competent authority.

3 What do I need to do?

Please contact UKOP (ukop@ogauthority.co.uk) for setting up the CA Portal account for your organisation and CA Portal account for staff who need access to the Portal.

The onus will be on the duty holder to ensure the correct legal entity (i.e. owner of non-production installation, or appointed operator of a production installation or appointed well operator) is selected when preparing the submission in the CA Portal.

◆ New Safety Case

New safety cases due for submission after 1 October 2017 will have to be made through the CA Portal. If the installation is not available in the database to choose from, please get in touch with UKOP (ukop@ogauthority.co.uk) or the Support Line on 0300 067 1682. UKOP will check with OSDR prior to adding the installation to the database.

◆ Material Change (including Transitional Safety Case) and Thorough Review

In order to submit a Material Change (including Transitional Safety Case), Thorough Review or Dismantlement Safety Case, duty holders will need to create a file for the installation in the CA Portal by uploading a copy of the last accepted safety case and a copy of the last Thorough Review. Creating a file will allow the duty holder to initiate a Material Change or submit a Thorough Review. Irrespective of the need for Material Change (including Transitional Safety Case), Thorough Review or Dismantlement Safety Case, duty holders must create individual safety case file(s) in CA Portal for the relevant installation(s) by uploading a copy of the last accepted safety case and a copy of the last Thorough Review by 30 June 2018.

Oil Pollution Emergency Plans (OPEP)

◆ New OPEP submissions

All new OPEP submissions from 1 October 2017 will also have to be made through the CA Portal. If the installation(s) to be included in the scope of the new OPEP submission are not available in the CA Portal database please contact UKOP (as above). As per the Safety Case regime, UKOP will check with OSDR prior to adding the installation(s) to the database.

◆ Changes to existing OPEPs (including Communication and Interface Plans)

In order to submit a request to update an existing OPEP (including submission of a Communication and Interface Plan (CIP)) or to submit a five year review of an existing OPEP, the owner of a non-production installation or appointed operator of a production installation and/or appointed well operator must create a file for the existing OPEP in the CA Portal by uploading the latest approved controlled copy of the relevant OPEP. The owner of a non-production installation or appointed operator of a production installation and/or appointed well operator can then initiate a request to change/update the OPEP. Irrespective of the need to update or

review an existing approved OPEP, the owner of a non-production installation or appointed operator of a production installation and/or appointed well operator must create an OPEP file in CA Portal and upload the latest controlled copies of all OPEPs (including any relevant CIPs) by 30 June 2018.

4 What if I don't use the CA Portal?

Please note that submissions by email will not be accepted after 1 October 2017 and will be returned to the duty holder (i.e. owner of a non-production installation or appointed operator of a production installation) or appointed well operator.

Any OSD R submission relating to the above made before 1 October 2017 will be managed as per existing OSD R arrangements. For further information regarding the OSD R arrangement, you can visit the Regulator's website at www.hse.gov.uk/osdr/index.htm.