

PUBLIC CONSULTATION
Improving offshore safety, health and environment in Europe

Questions for the public

Please use this response form for your replies. Thank you for respecting the maximum length for the replies as indicated after each question. This will ensure that your responses are taken into account in their entirety.

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UK Regime

Following Piper Alpha new tripartite arrangements for offshore regulation were implemented in the UK.

Under these it is the responsibility of the Health & Safety Executive (HSE), an executive non departmental public body of the Department for Work and Pensions, to assess and regulate the integrity and safety of offshore installations in the UK via the Health and Safety at Work Etc Act 1974 and the offshore specific suite of regulations.

The Department of Energy and Climate Change's (DECC) Energy Development Unit is responsible for licensing and regulating UK oil and gas activities, developing the environmental regulatory framework for the UKCS, and for administering and ensuring compliance with that regime in relation to offshore oil and gas exploration and production and decommissioning, including the approval of Oil Pollution Emergency Plans (OPEPs).

The Maritime and Coastguard Agency (MCA), an Executive Agency of the Department for Transport is responsible, if required, for deploying national counter pollution assets to minimise a pollution incident.

The UK response to this consultation reflects the work of all three organisations.

- 1. Which changes, if any, would you recommend to the authorisation conditions for offshore prospection or exploration or production activities? Please specify which authorisations your recommendations concern (all authorisations, those in a specific country, those authorising only a certain stage(s) such as prospection, exploration or production etc) (Please limit your response to maximum 1000 words)**

The UK considers that the focus of any "authorisation regime" relating to safety and environmental protection measures should be at a time when it is reasonable to expect an operator to have all the detailed information necessary to submit to the regulator prior to the start of the relevant activity. This may not be the case at the time when the licence is awarded. The key issue, and one that features in the UK system, is that there should be regulatory "hold points" at various stages prior to prospecting, exploration and production operations to ensure that activity cannot commence until risks have been considered and the regulator has confidence that the operator has the capacity and capability to implement appropriate safety and environmental control. Undue prescription of when these hold points should apply would be unhelpful.

The UK has an established oil and gas industry and has developed a robust, proven national environmental and safety regime over the last 40 years. Within this regime, the roles and

responsibilities of all parties, including well operators, sub-contractors and regulators are clear and well understood. Consequently, we are not convinced that there would be any added value to the UK to be gained from another layer of regulation.

The Lisbon Treaty specifically upholds a 'Member States right to determine the conditions for exploiting its energy resources (Article 194) and the UK would not want action that:

impacted on Member States' licensing or specific regulatory decisions;
placed detailed requirements, rather than high level principles, on national regulators;
effectively lowered UK regulatory standards;
introduced additional regulatory burdens at the time of granting the initial licence or
introduced obligatory EU regulation, or control, of national regulators.

2. European law¹ foresees that the competent national authorities shall ensure that authorisations are granted on the basis of selection criteria which consider, among other things, the financial and technical capability of the companies wishing to carry out offshore oil or gas operations.

**a) What key elements² should this technical capacity requirement include in your view?
Please limit your response to maximum 500 words**

To be authorised to undertake any exploration, development or production work within a specific UKCS block a company (in the UK that company would be the "operator") needs to show that it understands the development and environmental responsibilities, and that it is competent, both financially and technically, to discharge these under its agreements with its co-Licensees.

In the UK's view, the key elements in demonstrating technical capacity are as follows:

Company Structure: - showing clear lines of responsibility and clear processes for field management.

Management Structure - the company needs to be able to demonstrate a sound management structure staffed by an established group of experienced personnel. A substantial use of contracted staff would need to be justified.

Management System - Operators are required to show how they will manage the field in practice, clearly describing the division of responsibility between the company's own staff and contractors if the latter are employed. Operators also need to demonstrate how they will ensure that any contractors employed have and will maintain appropriate levels of competence and standards and how the operator will manage communications and delegation of responsibility. These procedures should look to recognised management and auditing standards.

Environmental Management - It is essential that operators demonstrate that they have systems and procedures in place to identify, monitor and control the environmental aspects associated with their exploration and production activity, and in doing so comply with regulatory requirements. This would include systems and procedures to respond to any environmental incidents. At the licensing stage they must have a commitment to put a comprehensive independently verified environmental management system in place and this must be implemented before any offshore

¹ Directive 94/22/EC of the European Parliament and of the Council of 30 May 1994 on the conditions for granting and using authorizations for the prospecting, exploration and production of hydrocarbons

² Focus is only on the main elements of this capability as opposed to detailed requirements which vary according to the different geological, geophysical, technical and other circumstances of each individual case.

activities are carried out. In addition the EMS must incorporate mechanisms designed to achieve continual improvement in environmental performance.

Field Management Resources – details on the technical resources available to the operator and their analysis of the potential for the field that they are operating.

Training Policy – training is a fundamental part of the operator’s safety and environmental management system. Details of any formal training standards that the applicant has adopted should be noted as well as the way in which the operator will establish such standards in contractors.

Safety – An operator must have the ability and means to control the major hazard accident risk effectively. This is primarily demonstrated in the safety case, which outlines how they identify and assess the risks, what risk control they will implement, and how they will comply with safety legislation - the UK safety regulator will inspect against such factors in the safety case when they conduct offshore visits.

b) Similarly, what key elements should the financial capability requirement include in your view? (Please limit your response to maximum 500 words)

At the licensing application stage, checks should be carried out on the company’s viability and its ability to meet the actual costs that may reasonably be expected to arise from the proposed work programme. In the UK, the licence sets no limits to the licensee’s liabilities and the licensee must demonstrate at the time of the licence application that they have sufficient funds or indemnity provisions to meet expected commitments, liabilities and obligations. This would include liabilities relating to any environmental incidents.

These checks may need to be repeated and updated at the point when a licence is awarded and prior to undertaking specific activities, as there can be significant time gaps between the application, the award of a licence and the commencement of offshore activities.

Further checks should be carried out if there is any change of operatorship/licence holder, to ensure that the new operator/licensees have the financial provision to continue with the expected commitments. If the initial exploration is successful and the licensees wish to develop production facilities, further checks would be performed to ensure that they can meet the financial commitments entailed by the proposed Field Development Plan. coupled with the financial strength to cope with unexpected incidents or emergencies and to pay for eventual decommissioning of the field facilities.

3. How (such as through legislation or voluntary measures at international, EU or national levels or by industry) should the adoption of state-of-the-art authorisation practices be best achieved throughout the EU? Should neighbouring EU Member States be consulted on the award of authorisations? (Please limit your response to maximum 1000 words)

The UK welcomes good dialogue and information sharing between the Member States and regulators. However, a key issue is how that is to be achieved. Any proposal will need to avoid draining regulatory experts away from essential national assessment, authorisation and inspection work to service a range of EU meetings and initiatives. The resourcing of such initiatives in the current economic climate is also an issue, and there may therefore be benefit in seeking to achieve this goal through existing commitments to Regional Sea Conventions.

In developing peer review mechanisms the Commission must work within the current EU approach. Member States are responsible for implementing EU Directives and there are well established

principles where Member States work with the EU to achieve such implementation. The UK supports the principle of the EU peer reviewing Member States implementation, but does not accept the suggestion that peer review of individual licensing, regulatory approaches or decisions should be carried out. Neighbouring States are given the opportunity to comment on proposed plans/programmes through the Strategic Environmental Assessment process and would also be given the opportunity to comment on Environmental Assessments for projects that could impact the waters of adjacent States. However, as detailed above, the decision as to whether or not 'authorisation' should be given must rest with the individual Member State.

Prevention of accidents

4. Please describe here any recommendations or changes (to the current regulatory framework or practices) - if any - that you consider important to improve the prevention of accidents affecting the health or safety of workers on offshore oil and gas installations in the EU: (Please limit your response to maximum 1000 words)

The UK does not think that it is prudent to recommend changes at an international or EU level, or to review Directive 92/91, unless and until any lessons emerge from the various investigations into the Deepwater Horizon incident that suggest that changes are needed. If the Commission decides that there is a need to review Directive 92/91 in respect of Deepwater Horizon, the UK would wish to participate fully.

In addition to the lessons from the Deepwater Horizon incident, this is an ideal opportunity for the European Commission, and Member States, to learn from the offshore oil and regulatory practice adopted by experienced national regulators. The UK has had decades of experience in regulating the offshore regime – including the lessons learned from Piper Alpha over 20 years ago. These lessons led to a dramatic improvement in the regulatory system in the UK and more generally in Europe. We are very happy to share this experience and knowledge with others, in particular the following practices:

- **Health and Safety Document (Safety Case) acceptance and review** - The Commission's Communication proposes an evaluation of requirements for safety cases for each operation. The UK offshore safety case regime requires every drilling rig and offshore production platform to have a Safety Case that is accepted by HSE before operations commence. Although Directive 92/91 has the requirement for a "health and safety document" which is broadly similar in scope, it does not require the relevant Member State regulator to assess the suitability of this document and the systems it describes. We find the assessment/acceptance work that we undertake to be an essential element of an effective safety case regime. Similarly, we require operators to keep their Safety Case "up to date", to seek further approval when significant changes are made, and to undertake a more formal thorough review of the document every 5 years, all areas on which Directive 92/91 is silent. These additional requirements help to ensure that the Safety Case becomes a living document, and one that forms a central part of an operator's safety management system.
- **Notifications** - The UK regime requires offshore installations to send notifications to the regulator at appropriate times; including:
 - Well design and drilling information to be notified at least 21 days prior to drilling or well intervention taking place;
 - Weekly reporting of well related information when undertaking offshore drilling and wells operations;
 - Notification of early design details for production installations;

- Notification of a variety of “dangerous occurrences” relating to well and platform incidents that could affect safety integrity, such as leaks of hydrocarbons and well “kicks”.

Such notifications allow early intervention by regulators when necessary.

- **Independent Evaluation** - The UK has, uniquely, a system of independent evaluation of key offshore systems:
 - Regular independent verification by bodies such as DNV, Lloyds Register, BV etc that safety critical equipment offshore, such as blow out preventers, is capable of meeting defined performance standards; and
 - A statutory requirement for well operators to obtain a check of the design and construction of the well by an independent competent person (a wells examiner) to ensure it is fit for purpose.

This independent examination and verification provides extra assurance to both the operator and regulator.

- **Well Integrity** - In the UK we require that well operators ensure that a well is designed, modified, commissioned, constructed, equipped, operated, maintained, suspended and abandoned that -
 - So far as is reasonably practicable, there can be no unplanned escape of fluids from the well: and
 - Risks to the health and safety of persons from it or anything in it, or strata to which it is connected, are as low as is reasonably practicable.

Ensuring that well integrity and well control issues are addressed throughout the life cycle of the well is a critical area.

5. Please describe here any recommendations or changes (to the current regulatory framework or practices) – if any – that you consider important in order to better prevent damage to the natural environment from accidents on offshore oil and gas installations: (Please limit your response to maximum 1000 words)

The UK would be happy to share further details of their environmental regulatory processes with other Member States, but do not consider there is a need for further legislation in relation to this aspect.

A comprehensive framework of environmental protection measures has been developed in the UK to minimise the impact of oil and gas activities on the environment. This is embodied in bespoke oil and gas legislation much of which is derived from the legislation framework of the European Community. The UK fully complies with the requirements of Council Directive 2001/42/EC (“the Strategic Environmental Assessment Directive”), Directive 92/43/EEC (“the Habitats Directive”), Directive 2009/147/EC (“the Birds Directive”) and Directive 85/337/EEC (“the EIA Directive”). The UK is also a signatory to the Oslo and Paris Convention for the Protection of the Marine Environment of the North East Atlantic (the OSPAR Convention). To date, the UK has implemented and applied all of the OSPAR decision and recommendations. In addition, the UK is also a signatory to the International Convention for the Prevention of Pollution from Ships (MARPOL 73/78) Annex I of which applies to offshore oil and gas installations.

All activities that could potentially impact on the environment are subject to rigorous assessment and significant activities are controlled through the issue of permits consents or approvals. In addition to consideration by technical specialists within government, the UK also consults with the Statutory Nature Conservation Bodies (such as the Joint Nature Conservation Committee), and the Marine Management Organisation or relevant Devolved Authority, on all applications relevant to their interest and expertise and their views are taken into account in the approval process. The approval process is backed up by a comprehensive system of enforcement.

6. Please describe here any recommendations you would like to make on how to improve compliance of the offshore oil and gas industry with applicable offshore safety legislation and other regulatory measures in the EU. (Please limit your response to maximum 1000 words)

The Health and Safety Document (Safety Case) acceptance and review proposals, and the notification suggestions, outlined in response to Question 4 will all help to improve compliance. These result in the operator having to engage the regulator early in the process, which enables the regulator to proactively consider compliance at an early stage (e.g. the design of an installation or well) and creates opportunities for the regulator to provide advice to the operator. When appropriate the regulator will also be able to prevent work commencing until compliance is achieved.

In addition, there is a need to take steps to improve the safety culture offshore and ensure that the knowledge and experience of the offshore workforce is effectively used by operators when addressing health and safety. This has been a key activity for the UK over the last 12 months. This has included an offshore inspection project and working with industry and unions in the Workforce Involvement Group of the Offshore Industry Advisory Committee to identify additional measures that can be taken to address the issue. This includes: encouraging safety representatives to report hazards and play an informed role in major hazard identification, prevention and mitigation. We suggest that the European Commission consider what improvement may be needed in this area across Europe. The UK is happy to share with the European Commission its project findings when they are finalised later this year.

The UK also believes that industry/regulator/workforce groups are an effective mechanism to achieve improved compliance. Such groups can be used to identify poor, as well as best, practice and to develop industry guidelines and case studies on a range of key issues. For example, Step Change in Safety is a UK based partnership organisation that includes offshore operator and contractors. It has a vision of “Making the UK the safest place to work in the worldwide oil and gas industry”. It is led by a leadership team of senior managers and officials from member companies, industry-related trade associations, trade unions and the Health & Safety Executive. This Group has recently produced guidance and case studies on human factors and asset integrity.

In the UK, DECC’s Environmental Managers are responsible for the environmental assessment of offshore oil and gas activities and for the administration of environmental legislation. In order to ensure that industry complies with conditions contained in their environmental approvals, there is a robust inspection and enforcement regime in place. DECC’s Environmental Inspectors inspect records and management systems, interview people and observe site conditions, standards and practices to ensure that permit holders/operators have been, or are complying with the legislative requirements. Where necessary enforcement action is taken in accordance with the DECC’s Enforcement Policy to ensure that those who have duties under the law take preventative or remedial measures to prevent pollution; put in place measures to achieve compliance; and are held to account when failures to comply occur. All oil and chemical spills, irrespective of volume, must be reported to DECC’s Offshore Inspectorate, which maintains a 24 hour on-call capability to respond to any incident that may have the potential to impact the environment or on security of

supply. This capability also ensures that operators implement their Oil Pollution Emergency Plan in response to any incident.

In addition to regulatory inspections, operators carry out their own internal audits and reporting as part of the Environmental Management System (EMS) requirements. The UK requires all operators undertaking offshore activities to have an independently verified (EMS) which satisfies the requirements of OSPAR Recommendation 2003/5. An EMS is designed to achieve the prevention and elimination of pollution from offshore sources and to deliver and manage compliance with environmental legislation on an ongoing basis. As part of the UK's EMS requirements, Operators must also produce an annual public statement providing an overview of their offshore operations and environmental performance.

7. In your view, which are the key measures to supervise and verify compliance of the industry with offshore health, safety and environmental rules and who should do the supervision and verification? (Please limit your response to maximum 1000 words)

The UK feels strongly that there is a need to ensure that an appropriate regulator(s) is in place (e.g. in terms of competence and resources). Without this, the impact of any legislation will be limited. To give the European Commission assurance that an appropriate regulator(s) is in place, one option could be for Member States to share information with the Commission on how they regulate (including supervision and enforcement) their offshore oil and gas activities.

The independent examination and verification suggestions outlined in response to Question 4 would also provide extra assurance to the operator and regulator that standards are being met.

As detailed above, it is imperative that those who supervise and verify compliance of environmental rules should have the appropriate level of competence. The UK's Environmental Managers and Inspectors must all have a relevant degree and industry experience (5 years preferred) and all new staff go through a supervised training programme before carrying out independent assessments and inspections.

HSE's Offshore Division employs inspectors with relevant specialisms, professional skills, experience and knowledge to effectively regulate all hazards associated with the offshore oil and gas industry. Some will have significant on-shore major hazard HSE regulatory experience before moving into the Offshore Division, and those who are directly recruited HSE offshore inspectors are required to have:

- A degree or equivalent qualification in a relevant subject; e.g. Physics, Applied Chemistry, Engineering, Chemical Engineering or Mathematics.
- Chartered or Corporate membership of a relevant professional institution e.g. Institute of Mechanical Engineers (or equivalent), or the qualifications and experience to apply for membership and registration.
- Relevant postgraduate experience within the offshore oil and gas industry or petrochemicals.

All HSE inspectors also go through a mandatory 2-year 'Early Years Training Continuous Professional Development programme', followed by additional development when appropriate. We would recommend that Member States consider similar levels of expertise in their inspectors, if they do not do so already.

In the UK legislation is in place which allows the costs associated with environmental assessments

and inspections to be recovered from the applicants. This has facilitated an appropriate level of regulatory oversight, and this may be something that other Member States may wish to consider.

8. In your view, should the existing environmental liability legislation (Directive 2004/35/EC) be extended to cover environmental damage to all marine waters under the jurisdiction of the EU Member States? (Please limit your response to maximum 1000 words)

The UK accepts that there may be merit in exploring mechanisms to ensure that liability for damage caused by offshore activities is properly addressed in a manner which does not deter or exclude smaller companies from contributing to Europe's security of supply through their offshore exploration and production activities.

Liability in the UK is unlimited and each company on the licence is jointly and severally liable in the event of an oil spill. In addition, all offshore operators currently active in exploration and production on the UKCS are party to a voluntary compensation agreement known as OPOL (Offshore Pollution Liability Association Limited). The agreement provides for each operator to provide an orderly means for compensating and reimbursing any person who sustains pollution damage or losses, and any public authority which incurs costs for taking remedial measures (clean-up) as the result of a discharge of oil from any offshore installation. As part of the process, OPOL requires every operator to provide satisfactory evidence of its ability to meet any liability under the Agreement. OPOL provides for the mutual agreement from all of its members for the settlement of claims up to US \$250 million per incident, in the event of a default by an operator. This liability is based on worst case scenario planning. The UK believes that other Member States might wish to consider whether adoption of a similar system might be of value to them.

9. In your view, is the current legislative framework sufficient for treating compensation or remedial claims for traditional damage caused by accidents on offshore installations? If not, how would you recommend improving it? (Please limit your response to maximum 1000 words)

Please refer to answers to questions 2b and 8.

10. In your view what would be the best way(s) to make sure that the costs for remedying and compensating for the environmental damages of an oil spill are paid even if those costs exceed the financial capacity of the responsible party? (Please limit your response to maximum 1000 words)

Please refer to answers to questions 2b and 8.

11. What information on offshore oil and gas activities do you consider most important to make available to citizens and how? (Please limit your response to maximum 1000 words)

The UK considers that Member States should ensure the transparency of their own regimes; especially as freedom of information legislation is already in place. The resources burden on the EU and Member States to introduce and maintain a new system, including the provision of continuously updated information, would not be sustainable and would divert resources from other more urgent tasks. Even asking Member States to switch existing systems to a common data set would have substantial resource and operational implications (a loss of reliable trend data) without adding value for citizens.

In the UK, the Health and Safety Executive have an extensive website <http://www.hse.gov.uk/offshore/index.htm> which routinely publishes industry accident and incident

statistics, reports of regulatory initiatives etc. As an example, reports on two key programmes of offshore safety integrity inspection (KP3 and KP3 Review) are at <http://www.hse.gov.uk/offshore/kp3.pdf> and <http://www.hse.gov.uk/offshore/kp3review.pdf>. Such information provides both operators and public with a good overview of industry performance.

The Department of Energy and Climate Change also has a dedicated oil and gas website, which fully explains requirements and provides a wide range of information (<https://www.og.decc.gov.uk/>) DECC also reports oil and chemical spills to the Advisory Committee for the Protection of the Seas (ACOPS) and annual reports are placed on the ACOPS website (<http://www.acops.org.uk/acops-reports/>). In addition, as a member of OSPAR, the UK also reports on a variety of aspects including volumes of produced water discharged to sea, oil spills and causes of oil spills (<http://www.ospar.org/>). Following discussions with Commission officials, DECC is currently re-designing the environmental section of its website to improve navigation and make the data more accessible to interested parties.

12. What is the most relevant information on offshore oil and gas activities that the offshore companies should in your view share with each other and/or with the regulators in order to improve offshore safety across the EU? How should it best be shared? (Please limit your response to maximum 1000 words)

Companies should share lessons from incidents routinely within their national industry representative organisations and, when an incident has significant implications for the offshore oil and gas industry, every effort should be made to share the lessons with regulators and the industry internationally. It is the UK view that industry representative organisations should be challenged to take the lead on this issue. This approach will ensure information is shared as soon as possible and will obtain industry buy-in.

13. What information should the national regulators share with each other and how to improve offshore safety across the EU? (Please limit your response to maximum 1000 words)

UK has been a member of North Sea Offshore Authorities Forum (NSOAF) since its inception, and has found it to be an excellent means to exchange regulatory information and examples of best practice/lessons learnt from incidents etc. This includes:

- Reports on fatalities, accidents, dangerous occurrences and near misses;
- Particular incidents and accidents which have implications for the offshore industry and regulators;
- Updates on changes to national legislation and on European Commission proposals that could impact on the offshore sector;
- Report of projects (national or with other regulators); and
- Exchange of safety notes and bulletins.

As detailed in 11 above, the UK is also a member of OSPAR and the Offshore Industries Committee specially addresses oil and gas activity and allows members to share experience and best practice. Similar forums exist for the Baltic and Mediterranean States. If they do not exist in other seas, this may be something that relevant countries might like to consider.

14. Which means, if any, would you recommend using to promote, across the EU, the use of state of the art practices to protect occupational health and safety during offshore oil and gas operations? (Please limit your response to maximum 1000 words)

The UK's offshore safety regime is goal setting, rather than prescriptive, and places the responsibility on those who create risks to demonstrate that they have adequately assessed the risks associated with their work activities and put in place appropriate measures to control these risks. It has the flexibility to require operators to consider new standards or best practice as they emerge and to drive them to continually improve. A good example of how this works relates to well design. If new cement or other well integrity standards and good practice are adopted (e.g. following an incident), they would immediately need to be considered by duty holders under UK legislation. The UK feels that goal setting regimes, rather than prescriptive ones, are best suited to the continuous adoption of state of the art practices. The Commission should consider the benefits of such approaches when developing its proposals.

It is also the UK's view that a robust offshore regulatory framework must be supported by a strong (competent and well resourced) and effective regulator. This is the primary assurance that operators activities are assessed, and challenged, to ensure state of the art practices are adopted to protect workers offshore.

The UK agrees that appropriate forums for regulators, industry and workforce representatives are required to share best practice. The key issue is how that is to be achieved. Any proposal will need to avoid draining regulatory experts away from essential national assessment and inspection work to service a range of meetings and initiatives. The resourcing of such initiatives in the current climate is also an issue.

The UK suggests exploring how existing models, such as the Senior Labour Inspectors' Committee, the North Sea Offshore Authorities Forum or the International Regulators Forum, could evolve to deliver the European Commission's goals. These are established forums which are aimed at sharing information, lessons learned and best practice. However, to fully consider if such models can deliver the European Commission's goals, the UK needs clarity on what the European Commission is proposing.

15. Which means, if any, would you recommend using to promote, across the EU, the use of state of the art practices to protect the environment against accidents caused by offshore oil and gas operations? (Please limit your response to maximum 1000 words)

OSPAR collects data on oil spills and causes of oil spills, which are published. In addition, the Offshore Industries Committee will take account of Best Available Techniques (BAT) and Best Environmental Practice (BEP) when adopting Decisions, Recommendations and Agreements relating to offshore activities, and the Drillex Inter-sessional Correspondence Group is currently considering best practice in relation to drilling operations. Other Regional Seas Conventions may also collect such data and discuss similar issues, and the information could be shared across the EU to help improve practices more generally.

16. In your view what should be the role of the EU in emergency response to offshore oil and gas accidents within the EU? (Please limit your response to maximum 1000 words)

The UK considers that emergency response is the responsibility of the Operator of the installation and the Member State in the first instance. All activities are required to have oil pollution

emergency plans, which fully detail how the operators will respond to any oil spills. Within the UK, the Maritime and Coastguard Agency has considerable resources available to support a prolonged clean-up activity, if required. Additional commercial equipment is also available from specialist contractors.

However, we understand that negotiations are ongoing regarding the role of EMSA in such events and we would support EMSA having a role in helping to clean up pollution, provided that this was at the request of Member States.

The North Sea States and the European Community work together, including cooperation under the Bonn Agreement, to combat pollution in the North Sea Area from maritime disasters and chronic pollution from ships and offshore installations and to provide surveillance to detect pollution at sea. Similar agreements are in place in the Mediterranean and the Black Sea.

17. Please describe any recommendations you may have concerning cooperation with non-EU countries to increase occupational safety and/or environmental protection in offshore oil and gas operations internationally? (Please limit your response to maximum 1000 words)

The UK accepts in principle the idea of working to agree global good practice and standards, and welcomes any move to bring regulation across Europe, and internationally, to the current high levels adopted in experienced Member States with robust regulatory regimes. Whatever proposals are developed, these must support the principal that national regulators are best placed to regulate their own industries. We would, however, need to consider the availability of resources to support any new initiative.

The EC might wish to consider how established groups could be used in this role such as the G20, the North Sea Offshore Authorities Forum, the International Regulators Forum and the Regional Seas Conventions.

18. Please describe here any recommendations you may have on how to incentivise oil and gas companies with headquarters in the EU to apply European offshore safety standards and practices in all their operations worldwide: (Please limit your response to maximum 1000 words)

The UK considers that although global best practice is to be encouraged, we must remember that environmental, geological and political regimes around the world are likely to be very different from those found in Europe. As a result there may be legal and practical difficulties in applying European offshore safety standards and practices worldwide.