

PUBLIC CONSULTATION
Improving offshore safety, health and environment in Europe

Questions for the public

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Authorisations

As described in the consultation document, the competent authorities of the EU Member States define the concrete regulatory requirements and conditions for starting, pursuing and terminating offshore activities within the broader boundaries of EU legislation. These authorities govern also the authorisations for offshore activities in a given area (both in terms of access to exploit a certain geographical area, and in terms of approval to perform concrete activities), regulatory requirements on ongoing activities and closing of operations.

- 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)*

Authorizations to perform offshore activities are managed by one or several entities depending on the EU country. To authorize a company to perform offshore activities in an oil and gas field, the following group of conditions could be recommended:

- **Economical:** what are the economical benefits – for the country – of developing the oil and gas field? How can the company develop, manage and optimize the production of the field? Is it then economically feasible?
- **Financial:** does the company applying for the authorization have the financial capacity to perform its activity given the liabilities it might have to cover and the technical requirements below;
- **Technical:** – explained below – including means to minimize impact on the environment and ensuring the health and safety of its workers and contractors involved.

The economical, financial and technical conditions should be assessed by different authorities to avoid conflict of interest.

The parameters that could affect the requirements to obtain an authorization for offshore activities are:

- **Location:** the distance of the offshore activity to the coast, the depth at which the offshore activity is taking place. In all cases, all body of water should be submitted to conditions for authorization and particular attention should be given to activities near the coast of several EU and/or non-EU countries;
- **Stage in the life of the field:** prospection and exploration will theoretically have lesser impact than production. Whenever a company wants to enter the production stage,

provision for decommissioning and rehabilitation should be included. To our knowledge, only the UK and the Netherlands are currently requiring companies to propose a decommissioning plan;

- **Type of company:** differentiate between operator, drilling company, service company, etc. Ultimately, the operator that contracts various companies for prospection, exploration or production activities should consult with authorities – which could review the repartition of liabilities prior to commencement of activities;
- **Type of operation:** environmental and safety risk will vary from one type of operation to another. The possibility of simultaneous operations – on a same field or on a same day – should also be considered;
- **Type of asset:** production platform are “permanent” to the field, whereas a drilling rig or service equipment are present and operated for a given activity in the field. These assets, with the type of operation performed with them, present different levels of risks that can affect the authorization to perform offshore activities.

Authorities may want also to set some limitations on the license:

- **Duration of the license:** a license to operate a field will dictate the duration the operator can perform offshore activities on it. For drilling companies, the license may be reduced to the specific project on which it is assigned to drill, or to an agreed duration;
- **Scope of the license:** authorities may want to include several assets or type of operation under one license for one company;
- **Options to revoke a license:** the authorities may want to revoke a license based on the performance of the company;
- **Options for a “temporary” license:** some companies – for example, companies which have never operated in European waters or companies that are smaller (and hence may have smaller financial capability) – could be eligible for a conditional license, allowing them to start offshore activities under the condition that will provide further proof of their technical and/or financial capability.

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

The following technical and financial capability requirements could be included as criteria for authorizing a company to perform offshore activities:

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 prospection, 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.

Technical capacity:

- **Field development plan:** if applying for an authorization to produce the field, the operator should show its technical capacity by presenting its field development plan – even if the operator may not operate the field throughout. This should include:
 - o All assets to be installed or used during the offshore activities, their implementation, tests, operation, maintenance and decommissioning;
 - o An estimated time frame for its development;
 - o A demonstration of how the economic recovery can be maximized without jeopardizing safety and the environment. Data recovered and analysis performed during the prospecting and exploration activities should show the production capabilities and the maximum flow rates / pressures / temperatures that may be encountered during the production activity. Show how these parameters will be mitigated/managed;For contractors, the technical capacity to perform its activities and its understanding of the operator's activities should be proven. Provision for data collection and reporting may need to be considered;
- **Contingencies:** the company may present 1 or several options for contingencies;
- **Prevention:** the primary means to minimize impact on the environment and safety is prevention. The company can leverage by managing competency and asset integrity:
 - o **Competency:** does the company have experienced and trained personnel to perform a given activity? Demonstrate as well the adoption of best available techniques;
 - o **Asset integrity:** does the company have an integrity maintenance plan for the assets which will be use to perform the desired offshore activities;
- **Environmental:** has the company made an environmental assessment and set in place the appropriate measures to ensure its offshore activities do not affect the environment negatively? Include an environmental impact assessment that considers – but is not limited to – water pollution (spills), soil pollution, air pollution (flaring), wildlife and fish, existence of other surrounding assets, etc. Show the application of best environmental practices. A waste management plan may be considered if at the stage of producing the field;
- **Health and safety:** does the company have a health and safety systems, and especially an emergency response plan in place? The emergency response plan should show that communication or agreements have been established with other countries;

Financial capacity:

Currently, in the UK, DECC (Department of Energy and Climate Change) requires assurance that operator has substantial financial capacity that includes decommissioning. Similar provisions are required by the State Supervision of Mines (SODM) in the Netherlands. This is particularly critical, as the age of assets in Europe are reaching their theoretical limits.

An other aspect considered in the UK, is that the original owner – and intermediate owners – of a field or asset does not loose all liabilities when selling it to a new company. Considerations may also be given as to liabilities after decommissioning, when the field is – supposedly – returned to the country. In light of these points, financial capacity should include – but not be limited to – :

- For production activities authorisation – provision for the whole life of the asset, measured according to the risk of an activity;
- Demonstration that financial mechanisms are put in place to respond to agreed “damages”.
- Repartition of financial liabilities through the life of the asset and through the different actors involved in the development of the asset.

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 goal setting approach was first introduced in the UK through Lord Cullen’s report on the Piper Alpha disaster. Instead of imposing rules, the authorities propose specific quantifiable goals that the companies must meet. Hence, the companies have flexibility on how they will meet these goals. An important aspect is that the responsibility for managing safety and environmental aspects now rests on the Duty Holder – which is either the owner or the operator of an offshore asset.

The goal setting approach anticipates the lack of applicable laws or standards, especially in the case of new environments. Also, the goal setting approach does not exclude prescriptive regulations. Often, hybrid solutions employ elements from both goal setting and prescriptive approaches.

The EU and EU countries should consider such goal setting approach to encourage implementation of best available practices for authorizing offshore activities, and best available technologies to respond to the ever changing technologies, safety and environmental conditions.

The value of bringing such philosophy to the EU level would be to homogenize practices – the best practices are more likely to be universally adopted – and allow for better emergency responses and optimized management of financial impact.

In the case where the offshore activity has the potential to affect a non-EU country, this latter should be consulted on the award of the authorisations. This would open communication and help spread the financial liabilities.

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 goal-setting approach implemented in UK has generally been successful in managing Health and Safety of workers.

The UK’s Health and Safety at Work Act 1974 (HASWA) introduced a number of key principles that have proved to be powerful driver for improvements in health and safety in Great Britain.

These key principles include duties to be exercised by employers and employees. For example:

- Those who create risk to employees or others in the course of performing working activities are responsible for controlling those risks.
- Employees also have a responsibility to take reasonable care of the health and safety of others.

The main duties in HASWA are qualified by the phrase “so far as reasonably practicable”. This means that the reduction of risk must be compared against the time, money and effort required to

achieve the reduction. Additional controls are unnecessary if the time, money and effort would be grossly disproportionate to the risk reduction.

Profitability is not a valid argument against implementing a risk reduction measure.

Guidance on what constitutes “so far as reasonably practicable” is available in published codes and standards and guidance from the Health and Safety Executive, but the decisions on how much time, money and effort is required will always involve the exercise of judgement.

Compliance with the regulations produced under the Act is a legal requirement. But Codes of practice are published which also have a special place in criminal proceedings. Failure to comply with a code of practice is not an offence, but in the event of any criminal proceedings, compliance to a relevant code of practice can be a strong defence. Individuals who choose to not follow a code of practice should be prepared to demonstrate that they have implemented arrangements that are as effective, or better, than those in the code.

This is an example of the goal setting approach – as described in question (3) – and has been shown to be sufficiently flexible to accommodate novel situations without the inevitable necessity of publishing new regulations. The goals remain clear at all times while there remains considerable flexibility in how those goals are to be achieved.

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)*

Similarly to actions to better prevent accidents affecting the health and safety of workers, a goal setting approach should also be taken to prevent damage the natural environment.

In both cases – health or safety of workers and environmental protection – emphasis should be put on competencies and asset integrity. As such, while the companies will be encouraged to reach agreed goals, the EU may enhance or propose a set of directives to which the industry can use as basis of their performance standards:

- pressure equipment;
- electrical devices used in explosive environment;
- lifting equipment;
- well control equipment.

Verification of compliance and liability for damages

The enforcement of offshore health and safety regulations is the general responsibility of national public authorities. The enforcement measures include various activities such as on-site inspections, safety audits and reporting requirements for companies. The organisation, scope and frequency of these measures vary in the different Member States depending on national practices, laws and the local conditions.

While focus on compliance should prevent accidents, a robust liability regime needs also to be in place as accidents resulting in major oil spills may cause extensive environmental, economic and social damage. The financial consequences on the entities found liable for the accident may be significant. EU legislation defines the common principles (e.g. 'polluter pays - principle') and goals for ensuring liability for environmental damages while national laws and courts put them in practice. Concerning environmental liability, the applicable EU law (Directive 2004/35/EC)

addresses pure ecological damage in terms of protected species and natural habitats (biodiversity damage), water pollution damage and land damage. As regards affected waters, the ELD covers the territorial waters (up to 12 nautical miles off the shoreline), but not all marine waters under the jurisdiction of EU Member States (up to 200 or 370 nautical miles).

Responsibilities for traditional damage (such as loss of life; personal injury, health defects; damage to property and economic loss affecting for example fishermen) are usually determined by civil courts or tribunals in accordance with national laws and/or case law following goals and principles defined at national level.

Closely linked with the liability is the competence of the liable parties to actually stand up to their obligations. Insurance coverage in the offshore oil and gas sector is partial, with some companies insuring risks to a certain degree and others not. The insurance market does not currently provide products sufficient to cover damages of the magnitude seen in the Deepwater Horizon accident. Moreover, there are no international or EU-wide funds similar to those in maritime transport that would cover environmental or traditional liability.

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 Independent Verification Body (IVB) concept as implemented under UK offshore safety case regulations has contributed to improvements in regulatory compliance. The main objectives of independent verification are to help substantiate that current best practices are used, to provide assurance that assets have been designed to operate safely throughout their life and to ensure that all health safety and environment risks have been managed to acceptable / As Low As Reasonably Practicable (ALARP) levels. Independent Competent Persons (ICP) from the IVB organisations are able to spend more time than HSE (the regulatory body) with companies and audit their safety systems. Extension of the IVB scope into other regulations could deliver improvement in compliance.

Other EU countries do not require an independent entity to verify – and concordantly assist in improving compliance – with safety legislation and other regulatory measures.

The scope of work performed by IVBs in the UK is currently limited to a comparison of operator's performance against predefined performance standards. These performance standards rarely (if ever) include any standards of behavioural performance. ICPs should be invited to perform audits against behavioural performance. ICPs among today's IVBs typically have their main competences in traditional engineering disciplines: mechanical, electrical, etc. These new ICPs would need competencies in human factors, management of change and organisational behaviour.

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)*

Bureau Veritas currently acts as an Independent Verification Body, supplying Independent Competent Persons according to the UK Offshore Safety Case Regulations.

The verification process is generally considered to offer considerable benefits over the now defunct certificate of fitness process. This is evidenced by the adoption of similar processes by regulatory authorities in other countries (e.g. NOPSA in Australia), and voluntary adoption by national oil companies in the absence of a regulator (e.g. ADNOC in Abu Dhabi), and voluntary adoption of

aspects of the approach by international operators to parts of their worldwide operations.

Some of these adopters have also extended the general approach to areas that include health, environment and also asset functionality. In many cases, the verification activity starts at design stage. At all stages (design and operation) the overall process involves:

- Identification of the Major Accident Hazards;
- Strategy for risk reduction;
- Identification of Safety Critical Elements (or health, safety and environmentally critical systems);
- Definition of Performance Standards – either international or national codes and standards, or company standards;
- And independent verification against those standards.

Bureau Veritas is providing verification services in many of these extension situations and this seems to be a well accepted and effective approach.

The IVB is placed in a peculiar situation in cases where an operator wants to adopt the verification approach, but there is no regulator, such as in the case of ADNOC. In this case, the IVB takes the role of independent verifier, but also provides a form of certification.

Bureau Veritas recommends that within the EU, a verification process be established which incorporates the fundamental elements of the UK process for major accident hazards and extends this to health and environmental issues. The model should also identify a regulator having similar role to that of HSE in UK.

We would propose one modification to this model. The current UK arrangement requires that findings from the IVB are fed back to the owner / operator of each offshore asset. The IVB does not feedback findings or any summaries of experience back to the regulator. It would be beneficial if the process included the possibility for direct feedback from the IVB to the regulator in limited situations.

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 environmental liability legislation should cover environmental damage to all marine waters under the jurisdiction of the EU countries. Most importantly – as most waters under the jurisdiction of the EU countries share borders with non-EU countries – agreements should be reinforced or put in place with non-EU countries to address the case of environmental damage entering non-EU waters.

The EU should not only consider the liabilities concerning the environmental damage itself but also include the economic loss that ensued from the environmental damage.

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)*

The legislative framework treating compensation or remedial claims for traditional damage is sufficient – as long as “traditional damage” is within the scope of the civil courts and tribunal (*loss of life; personal injury, health defects; damage to property and economic loss affecting for example*

fishermen). Such “damages” are inherent to most industries – including the oil and gas industry.

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)*

Two possible options could be envisaged:

- Either set up an EU Emergency Response Fund that all operators contribute to based on profit. This fund could be administered by a European Oil and Gas Trade Association. It would be used to remedy and compensate for environmental damages if the costs did exceed the financial capacity of the responsible party;
- Or place the duty for covering liability excesses with the respective government responsible for regulating the operational activity.

Transparency, sharing of information and state-of-the-art practices

Transparency of an offshore regulatory regime means the policy and practices on how the regulatory authorities and offshore industry share information with each other, between peers or with the civil society. The degree of transparency affects the awareness of the public authorities, the industry and the civil society, i.e. on offshore oil and gas activities and the way they are managed and controlled. It may also affect the nature of communication, commercial interests of companies, spreading of technologies, lessons learned and cross-border cooperation. An example of transparency in the offshore sector is the practice of some EU national regulatory authorities to publish information such as accident statistics and license award decisions concerning offshore operations.

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)*

In the UK, there are already organizations that aim to inform and are constituted of operators, contractors and the Health and Safety Executive (HSE):

Safety information:

The UK Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR), place a legal duty on employers to report work-related deaths, major injuries or over-three-day injuries, work related diseases, and dangerous occurrences (near miss accidents). These are reported to Health and Safety Executive (HSE). HSE publishes the statistics in various reports and databases:

- A detailed database of offshore hydrocarbon releases is publicly available (omitting names of operator and installation)
- Health and Safety statistics are collected and published by HSE annually.

“Step Change in Safety” is a voluntary organisation with membership from UK oil and gas companies. The Step Change organisation is a vehicle for sharing safety improvement information and also runs many industry-wide programmes to improve safety. Most major operators are members, as are many engineering and well service companies etc. Members anonymously report details of accidents to Step Change which are then published on its website. The aim of publication is to inform and prevent the recurrence of the accident situation. Anyone in the industry can readily obtain access to the site.

Environmental information:

DECC publishes information about environmental emissions from offshore installations and

associated onshore terminals through the Environmental Emissions Monitoring System (EEMS).

Industry information:

The UK oil and gas industry has set up a platform called “Oil and Gas UK” that shares a range of industry information. The stated aim of Oil and Gas UK: "... is to strengthen the long-term health of the offshore oil and gas industry in the United Kingdom by working closely with companies across the entire sector, governments and other stakeholders to address the important issues." Step Change in Safety is a branch of Oil and Gas UK. Again, membership is voluntary, but all operators in UK waters and the majority of service companies are members.

Oil and Gas UK runs about 15 forums on various topics including Environment, Health and Safety and Major Accidents. The working sessions of the forums themselves are generally members-only. Many of the guidelines produced by Oil and Gas UK are of less interest to the general public (examples: Guidelines on Management of Aviation Operations, Guidelines for the management of flexible hose assemblies).

The forums are supported by workgroups which address specific topics. Membership of these workgroups is by invitation only.

Oil and Gas UK has published other guidance which is available publicly.

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)*

Oil and Gas UK is an example of organization where offshore companies share industry information with each other. Similar consortiums in other countries – within the EU and beyond – help in spreading best practices and knowledge.

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)*

The international regulators’ forum could be a good platform to improve safety across the EU and worldwide. It currently englobes UK, Canada, USA, Australia, Norway, New Zealand, Brazil.

This is particularly useful for countries that do not have a developed oil and gas sector.

An other aspect that can shed light on safety or environmental issues is the cross referencing with safety and environmental issues from different industries. This is particularly relevant for issues involving:

- Safety: pressure equipment, electrical components used in explosive atmospheres or lifting equipment;
- Environment: usage of chemicals and effect on water, air, soil.

In the UK, Independent Verification Bodies share experience among themselves through the IVB Forum which is attended by the main UK verification bodies: BV, DNV and Lloyds. They have periodic meetings to share experience. Shared information is limited to the scope of the IVB activity – major accident safety only, not occupational safety or environment. An extended scope of activity for the IVB could prove very valuable in enhancing safety (and environmental) practices.

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)

Although this would not be called a “promotion of state of the art practices”, the main incentive for the use of state of the art practices to protect health and safety is that the company is civilly responsible.

An important concept that the oil and gas industry promotes is that safety comes first. No worker has to jeopardize his/her health or safety to execute an offshore activity. This is actually a philosophy that needs to be acquired through training.

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)*

Similarly to practices recommended to protect occupational health and safety, the main incentive for the use of state of the art practices is that the polluter pays.

Also, the OSPAR convention – due to its coverage of the Atlantic, Barents and North Seas – has a greater experience of environmental practices. Stronger ties with MEDPOL, the Helsinki commission and the Bucharest convention would help spread the best practices.

Currently, EMSA’s focus is on oil spill response. Its role should be extended to cover:

- Water pollution in general;
- air pollution;
- soil pollution;
- utilisation of chemicals.

Emergency response and International activities

The emergency response capacity at present consists of resources and contingency plans on the level of the industry, national administrations and of the EU. In general, contingency plans are required for all offshore installations and are complemented by national and EU contingency plans to respond to large scale accidents. Adequacy of resources and their coordination, both affect the effectiveness of response to offshore accident. In response to recent accidents, particularly the one of the Deepwater Horizon drilling rig in the Gulf of Mexico, the emergency capacities are being strengthened. For instance, new response devices are being developed for use in deepwater conditions.

In the Mediterranean and the Black Sea offshore, oil and gas activities are underway both on EU and adjacent non-EU waters. This causes a risk for cross-border environmental damages from a possible offshore accident, not only across internal EU borders, but also across EU's external border. Apart from an interest in promoting high offshore safety practices also in adjacent regions, the EU participates in international activities to increase safety of offshore activities.

In response to the differing regulatory requirements both within the EU and internationally, some oil and gas companies have adopted company practices or standards that they apply to their activities in the EU and outside. Others adjust their practices more substantially to suit local conditions in the given country.

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)*

In the case of the UK, PFEER (Prevention of Fire and Explosion, and Emergency Response Regulations) recognise that the operator or owner of the asset is best placed to secure effective emergency response. This duty is aligned with the HASWA principle that those who create risks are responsible for controlling those risks. Keeping in line with the goal setting approach, PFEER defines a number of safety goals in connection with the emergency response plan.

In the same time, the UK is rationalizing the search and rescue operations, with no considerations outside UK waters.

In light of how the UK handles emergency response, it is the view of Bureau Veritas that:

- The operator or owner of an offshore asset is responsible for setting up and organizing an emergency response plan;
- The EU should set up agreements to facilitate communication and mobilisation of emergency response teams in the areas of search and rescue operations, emergency evacuations, pollution containment teams;
- Above agreements should be established by the EU with EU countries through existing organizations, such as EMSA, but also with non-EU countries;
- Using the established agreements, the operator or owner of the offshore asset should submit an emergency response plan that can include “foreign” intervention.
- Emergency response should be the responsibility of the operator, however contractors must also submit emergency response plans and the operator’s plan should incorporate the contractor’s plan. In a practical way, there should be a general emergency response plan for the zone, the asset then consideration – each day, each change of operational task – of the players performing an activity on that day, for that task.

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)*

In order to increase occupational safety and/or environmental protection, a shared repository of incidents – both safety and environmental – could be made available to the offshore industry. An agreed anonymous incident reporting system could be set in place to help exchange of such information.

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)*

Bureau Veritas receives an increasing number of inquiries from around the world concerning the UK Safety Case and verification. It appears then that the goal setting approach of the UK – and to a greater extent European standards and practices – is well recognized in the oil and gas industry and is gaining greater recognition worldwide. It is in the best interest of international oil and gas companies to apply European offshore safety standards and practices:

- It reduces the number and variations of requirements for which the companies must have a thorough understanding;
- It minimizes confusion or interpretation of the local standards and practices.

Several ways to incentivise oil and gas companies are:

- Push for a combination of prescriptive and goal setting approaches for the European standards and practices to adapt best and englobe country to country requirements;
- Strengthen ties with regulatory bodies of countries with important offshore activity. Establish agreements with international organizations, regulatory bodies and/or countries which “allow broader acceptance” of European standards and practices;
- Account for a company’s worldwide experience, asset integrity management, track record in safety and environmental protection when it applies for a license in EU territories or waters;
- This is particularly valuable for international contractors that supply several operators in many countries;
- Recognize – through accreditation or certification – non EU companies that show experience and competency in the following disciplines: well control, emergency response, oil spill response, etc.

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