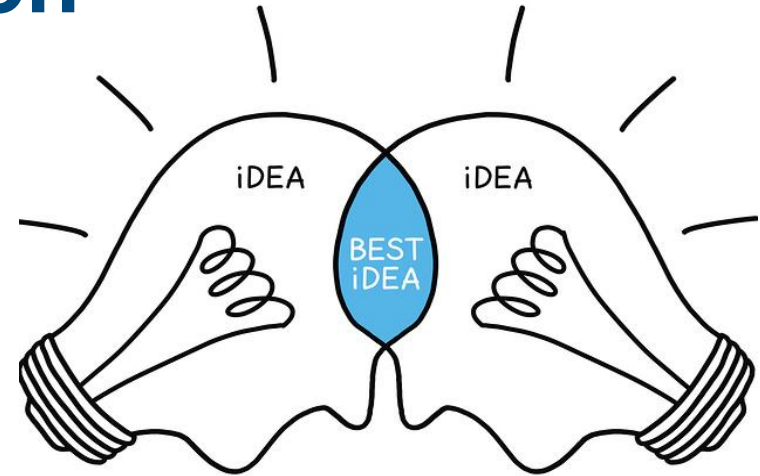

Regulator Challenge & Collaboration

Oil & Gas UK Annual Conference
6 June 2017


Department for
Business, Energy
& Industrial Strategy

Challenge & Collaboration

- What is challenge?
 - Engaging in a contest;
 - Dispute the truth or validity of;
 - A call to prove or justify something;
 - A competitive situation
- How are we challenged and when do we collaborate
- Future opportunities for collaboration



Challenge

- Formal Challenge

- Appeals process against Decisions of OSDR
- Appeals process against Decisions by OPRED;
- Representations to SoS where varies permits
- Complaints procedures

- Informal Challenge

- Interpretation of regulations / guidance
- Understanding Regulator expectations
- Proportionality
- Consistency



Challenging Environment

- Increased Regulatory Pressures
 - Offshore Safety Directive transition / OSDR Competent Authority
 - Environmental Regulations
 - OGA
- Low Oil Price
- A need to do more with less

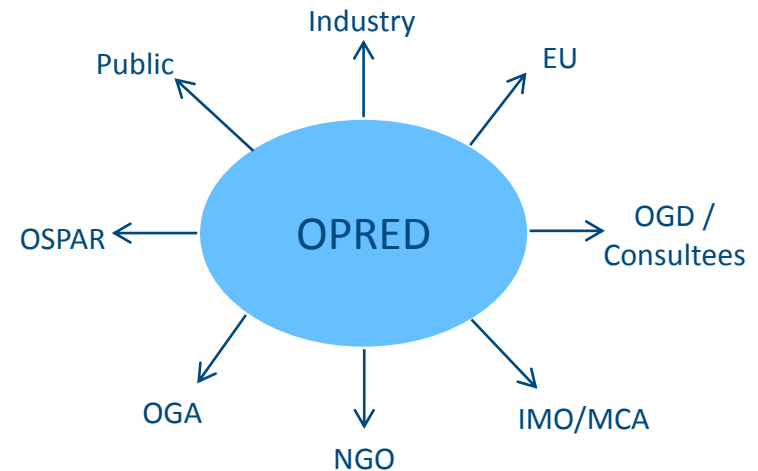


Challenges & Collaboration

Policy Level

Routine OGUK / OPRED Discussions / Meetings:

- EU policy / Regulatory proposals;
 - HC BREF
 - EU ETS
 - MCPD
- OSPAR Policy, Recommendations & Decisions;
 - RBA
 - Birds & Lighting



Challenges & Collaboration

Industry Level

New Regulations

- Consultation on proposals
 - OSD – SCR, OPRC, LR
- Engagement during implementation
 - CA Industry Events
 - IADC OPEP discussions

New Processes

- Revising Guidance
 - OPEP worst case vs credible scenarios
 - CMAPP, L154



Challenges & Collaboration

Company Level

Submissions

- Safety Cases & Notifications
- Operator appointments

Compliance

- Resolving inspection / investigation issues

Individual Operator Meetings

- Monthly / Quarterly meetings
- Performance meetings
- Sharing Lessons
 - ICS / SOSREP



Challenges & Collaboration

Problem Areas

Lack of Guidance / Process

- MEI
- ECE

Differing Views

- Interpretation of Regulations

‘Anonymous’ Challenges

- Inconsistency – between inspectors; OEI/EMT; HSE/OPRED
- Proportionality – being treated differently



The Future

Better collaboration

Working with OGUK on Guidance:

- Share & discuss Guidance before published
- Early warning of proposed changes

Engaging the wider industry

- IADC

OPRED Industry Forum:

- *Identify and enable opportunities for clear, consistent and proportionate environmental regulation*
 - Deliver collaboration and commitment to behaviours that will improve proportionate compliance;
 - Identifies areas of concerns from OPRED and industry
 - Agrees and prioritises concerns and opportunities – establishing Task & Finish groups, as required, at a technical level to deliver solutions





KEEP
CALM
AND
START
COLLABORATING

