Strategy - 2018 to 2023

1.0 INTRODUCTION

1.1 Directive 2013/30/EU of the European Parliament and of the Council of 12 June 2013 on safety of offshore oil and gas operations and amending Directive 2004/35/EC require member states to establish an effective Competent Authority (CA) (Articles 8 and 9). The UK has appointed the Secretary of State and the Health and Safety Executive (HSE) to act as the CA for the purposes of the Directive. In practice, the Secretary of State’s functions will be carried out by the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) (part of the Department for Business, Energy and Industrial Strategy (BEIS)).

1.2 The CA formed by OPRED and HSE is named the Offshore Safety Directive Regulator (OSDR). It is referred to in this document as “the OSDR partnership”.

1.3 The Directive (in Annex III, paragraph 2(a)) requires the CA to prepare a written strategy that describes its duties; priorities for action; and how it is organised. The purpose of this document is to set out the OSDR partnership’s strategy in accordance with the requirements of the Directive.

2.0 DUTIES

2.1 OPRED and HSE will work in partnership to ensure compliance with the relevant UK and EU legislation that implements the Directive. Within the OSDR partnership, OPRED will take the lead in regulating offshore environmental matters and HSE will take the lead in regulating offshore health and safety issues.

2.2 This involves assessing safety cases; assessing and approving oil pollution emergency plans; inspecting wells and other statutory notifications; undertaking planned inspections; investigating accidents, incidents and complaints; and taking regulatory enforcement action.

2.3 The OSDR partnership will collect relevant information required by the Directive and the related Implementing Regulation and share it with the European Commission and the public.

2.4 In exercising its regulatory functions and in accordance with the Directive, the OSDR partnership will remain independent from agencies responsible for the economic development of the UK’s offshore natural resources; licencing of offshore oil and gas operations; and the collection and management of revenues from those operations.

2.5 The OSDR partnership’s regulatory interventions will be with owners and operators of offshore installations and others with related legal duties that fall within the scope of the Directive and its related UK legislation. To support its regulatory functions, OSDR will also engage with other regulatory bodies, stakeholders, trade union representatives and the offshore industry workforce.

3.0 ORGANISATION

3.1 From a stakeholder perspective, the OSDR partnership organisational arrangements provide a single, consistent regulatory interface with the UK oil and gas industry for the major hazard safety and environmental issues covered by the Directive. This includes:

3.1.1 A website for information relating to the OSDR partnership; development of an online portal for all regulatory notifications and submissions, regardless of whether related to safety or environmental issues; and development of a tool for reporting under the EC & UK requirements (ROGI).

3.1.2 A single, coherent set of assessment and acceptance procedures for safety cases, oil pollution emergency plans and the various other regulatory notifications and submissions that are required, including major hazard incident reporting.
3.1.3 A single intervention plan for each owner or operator of offshore installations, and well operators, covering all planned OSDR interventions, with the presumption of joint OPRED/HSE visits where appropriate.

3.1.4 Coordinated investigations, with decisions made at an early stage as to which regulatory partner should lead, with aligned principles of enforcement covering safety and environment.

3.2 A Memorandum of Understanding (MoU) sets out the general working arrangements intended to coordinate functions between OPRED and HSE in accordance with the requirements of the Directive. The MoU is supplemented by a suite of process framework diagrams and supporting documents that set out the detailed operating procedures of the OSDR partnership. The core framework documents are available on the OSDR website. OPRED and HSE will avoid any duplication of regulatory functions.

3.3 A Senior Oversight Board is responsible for the senior management and oversight of the CA. The Board is supported by an Operational Management Team (OMT) and Operational Working Groups. The Board’s composition, functions and responsibilities are described in an Articles of Governance and Management document, which also describes the organisational arrangements for the OMT and working groups.

4.0 STRATEGIC OBJECTIVES and PRIORITIES for ACTION – 2018 to 2023

4.1 OSDR’s strategic objective is to prevent safety and environmental catastrophe by ensuring that offshore oil and gas installation owners and operators maintain effective major accident risk management arrangements. In particular, OSDR will require duty holders to discharge their legal responsibilities, which are to prevent, control and mitigate major safety and environmental accident hazards and their consequences.

4.2 The OSDR partnership’s strategic priorities for action focus on the design and operation of offshore oil and gas installations; the management and maintenance of their integrity; and the effectiveness of arrangements for emergency preparedness and response. From 2018 to 2023, OPRED and HSE will focus in five areas of priority to:

4.2.1 Assess Safety Cases and scrutinise Oil Pollution Emergency Plans (OPEPs).

4.2.2 Inspect Combined Operation Notifications, Well Notifications and Design and Relocation notifications.

4.2.3 Investigate major or potential major accidents to establish their immediate and underlying causes and share relevant information with a view to preventing recurrence.

4.2.4 Proactively inspect to sample compliance in practice with major hazard control arrangements described by Safety Cases and OPEPs.

4.2.5 Take appropriate regulatory enforcement action to deliver justice and secure compliance by those with legal duties under relevant statutory provisions.

4.2.6 Engage in tripartite consultations involving the OSDR partnership; workers’ representatives; and installation operators, owners and well operators.

4.3 The OSDR partners have intervention procedures and resource to support the delivery of these strategic priorities. These focus on safety and environmental topic areas, including: design and operational safety cases; leadership; competence; asset integrity and maintenance; reduction of unplanned hydrocarbon releases; safety and environmental emergency arrangements; worker engagement; environmental management; and environmental operational control.

5.0 REVIEW

5.1 The OSDR Senior Oversight Board will periodically review this strategy as part of its functions and responsibilities.