



Overview assessment of implementation reports on OSPAR Recommendation 2005/2 on environmental goals for the discharge by the offshore industry of chemicals that are, or contain added substances, listed in the OSPAR List of Chemicals for Priority Action



OSPAR Convention

The Convention for the Protection of the Marine Environment of the North-East Atlantic (the "OSPAR Convention") was opened for signature at the Ministerial Meeting of the former Oslo and Paris Commissions in Paris on 22 September 1992. The Convention entered into force on 25 March 1998. It has been ratified by Belgium, Denmark, Finland, France, Germany, Iceland, Ireland, Luxembourg, Netherlands, Norway, Portugal, Sweden, Switzerland and the United Kingdom and approved by the European Union and Spain.

Convention OSPAR

La Convention pour la protection du milieu marin de l'Atlantique du Nord-Est, dite Convention OSPAR, a été ouverte à la signature à la réunion ministérielle des anciennes Commissions d'Oslo et de Paris, à Paris le 22 septembre 1992. La Convention est entrée en vigueur le 25 mars 1998. La Convention a été ratifiée par l'Allemagne, la Belgique, le Danemark, la Finlande, la France, l'Irlande, l'Islande, le Luxembourg, la Norvège, les Pays-Bas, le Portugal, le Royaume-Uni de Grande Bretagne et d'Irlande du Nord, la Suède et la Suisse et approuvée par l'Union Européenne et l'Espagne.

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1. Introduction

1.1 OSPAR Recommendation 2005/2

The purpose of OSPAR Recommendation 2005/2 is to set environmental goals for the discharge in the OSPAR maritime area of offshore chemicals that are, or contain added substances, listed in the OSPAR List of Chemicals for Priority Action, in order to set a specific time-frame for moving towards the cessation of these discharges from offshore installations.

OSPAR Recommendation 2005/2 applies to Contracting Parties which have offshore installations under their jurisdiction in their internal waters or territorial sea, or on their continental shelf.

1.2 Implementation reporting

1.2.1 General reporting requirements

Under Article 22 of the OSPAR Convention, Contracting Parties shall report to the Commission at regular intervals on the national measures (legal, regulatory, or other) taken by them to implement the provisions of the decisions and recommendations adopted under the OSPAR Convention and on the effectiveness of these national measures. This implementation reporting forms the basis for OSPAR to assess the compliance by Contracting Parties with the Convention and ultimately to evaluate the effectiveness of programmes and measures under the Convention.

Detailed provisions on implementation reporting and related assessments by OSPAR are laid down in OSPAR's Standard Implementation Reporting and Assessment Procedure (reference number 2003-23, update 2005). Unless stated otherwise in the OSPAR instrument concerned, the practice has been in general that an implementation report should be submitted to the appropriate OSPAR subsidiary body in the intersessional period four years after the adoption of a measure and every four years thereafter until fully implemented. Implementation reporting does not apply to Contracting Parties with reservations (or non-acceptance) on an OSPAR measure unless and until the reservation (or non-acceptance) is lifted.

1.2.2 Reporting requirements under Recommendation 2005/2

Reports on the implementation of OSPAR Recommendation 2005/2 should be submitted by Contracting Parties with offshore installations that make discharges, using as far as possible the format set out in Appendix 1 of the Recommendation, by 31 January 2007 and 31 January 2010.

A first set of implementation reports on OSPAR Recommendation 2005/2 was submitted to OIC 2007, and the overview assessment of the reports was published by OSPAR 2008 (Overview Assessment of Implementation Reports on OSPAR Recommendation 2005/2 on Environmental Goals for the Discharge by the Offshore Industry of Chemicals that are, or contain Added Substances, listed in the OSPAR 2005 List of Chemicals of Priority Action. Publication number 350/2008).

A second set of implementation reports on OSPAR Recommendation 2005/2 was submitted to OIC 2010, and the United Kingdom as task manager has prepared the present overview assessment on the basis of these reports, which are attached in Annex 1.

2. Overview on Implementation of OSPAR Recommendation 2005/2

2.1 Overview on implementation

Denmark, Germany, Ireland, Norway, the Netherlands and the United Kingdom have completed the reporting format for the implementation on OSPAR Recommendation 2005/2. France informed that it had not authorised any relevant chemicals that are, or contain added substances, listed in the OSPAR List of Chemicals for Priority Action and that the phase out of such chemicals was therefore irrelevant. In the view of France, it was therefore unnecessary to provide a full implementation report. Spain informed that there was no change from the information provided in their 2007 implementation report. There is very little offshore activity in Spain and the use of offshore chemicals is low, with no offshore discharges of chemicals or produced water. It had therefore been unnecessary to authorise the phase-out of the discharge of chemicals that are, or contain added substances, listed in the OSPAR List of Chemicals for Priority Action. Tables 1 and 2 below provide an overview of countries which have reported, any reservations and means of implementation of OSPAR Recommendation 2005/2.

Table 1. Implementation report on compliance with OSPAR Recommendation 2005/2

IMPLEMENTATION REPORT ON COMPLIANCE		
Contracting Party	Reservation applies	Applicable
Denmark	No	Yes
Germany	No	Yes
Ireland	No	Yes
Norway	No	No
Netherlands	No	Yes
United Kingdom	No	Yes

Table 2. Means of Implementation of OSPAR Recommendation 2005/2

MEANS OF IMPLEMENTATION						
Contracting Party	Means of Implementation of the measure in §3.1 of the Recommendation (ban on new authorisations of discharge of offshore chemicals)			Means of Implementation of the measure in §3.2 of the Recommendation (phase-out of discharge of offshore chemicals)		
	Legislation	Administrative action	Negotiated agreement	Legislation	Administrative action	Negotiated agreement
Denmark	No	Yes	Yes	No	Yes	Yes
Germany	Yes	No	No	Yes	No	No
Ireland	No	Yes	No	No	Yes	No
Norway	Yes	Yes	No	Yes	Yes	No
Netherlands	Yes	No	No	Yes	No	No
United Kingdom	No	Yes	Yes	No	Yes	Yes

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Information provided on means of implementation of the measure in §3.1 of the Recommendation:

Specific measures taken to give effect to this measure

In Germany and the Netherlands no specific measures have been taken to give effect to this measure.

In Denmark, in compliance with its *National Offshore Action Plan*, the use and discharge of “black” chemicals offshore ceased in 2005. “Black” chemicals are identical to those which are, or contain added substances, listed in the OSPAR List of Chemicals for Priority Action.

In Ireland all substances proposed for discharge offshore are checked against the OSPAR List of Chemicals for Priority Action.

In Norway, as part of their Zero Discharge Goal, by 1 January 2006 the discharge of priority substances offshore should have phased out. Follow-up is undertaken through the issue of discharge permits and the assessment of annual reports on discharges from the operators.

In the United Kingdom the competent authorities have not issued any new authorisations for offshore chemicals that are, or contain added substances, listed in the OSPAR List of Chemicals for Priority Action, but have continued to permit two offshore chemicals (pipe dopes) that were notified and approved prior to OSPAR Recommendation 2005/2 coming into force.

Any special difficulties encountered, such as practical or legal problems, in the implementation of this measure

Germany, Ireland and the Netherlands have reported no difficulty in implementing this measure.

In Denmark offshore operations have taken place in the Faroe Islands waters during the years 2001, 2006 and 2008. For 2008 it was reported that there was 10 kg use and 1 kg discharge of “black” offshore chemicals for the Faroe Islands.

Norway has reported the continued use of chemicals containing an added substance listed in the OSPAR List of Chemicals for Priority Action. These chemicals were pipe dopes containing lead, and the use quantities during the period 2005–2009 are detailed in the table below. These pipe dopes were used as back-up chemicals on two installations in 2009, when they had encountered problems breaking the pipe threads, but no planned discharges of the pipe dopes had been permitted (see §2.2).

Norway additionally reported the continued discharge of a chemical containing an added substance listed in the OSPAR List of Chemicals for Priority Action. This chemical was a hydraulic fluid containing approximately 3% Di-2-ethylhexylphtalate (DEHP), and the discharge quantities during the period 2005–2009 are detailed in the table below. The hydraulic fluid is contained in a large subsea hydraulic system with normal discharge during actuation of the vents, and it has not been possible to replace all the fluid in the system. Norway has therefore accepted a gradual phase out of the discharges, which will ultimately be totally replaced by a new compatible hydraulic fluid that does not contain an added substance listed in the OSPAR List of Chemicals for Priority Action. The period of replacement and discharge of the hydraulic fluid will extend into 2010, but the annual discharge will gradually diminish.

Table 3. Use and Discharge of Priority Substances on the NCS 2005–2009

	2005	2006	2007	2008	2009
Use (kg)	1032	594	497	146	19,6
Discharge (kg)	3,3	6,6	0,6	140*	58

*117 kg copper in pipe dope (a national priority substance until 2008)

The United Kingdom has reported that it had continued to issue new permits for the use of two pipes dopes, which are effectively two versions of the same offshore chemical.

Reasons for not having fully implemented this measure and plans for full implementation

Germany and the Netherlands have reported that they have fully implemented this measure.

The United Kingdom has reported that it had not fully implemented this measure if “authorisation” includes the permitting of chemicals that were notified and approved prior to OSPAR Recommendation 2005/2 coming into force.

Information provided on means of implementation of the measure in §3.2 of the Recommendation:

Any programme of review of authorisations and progress of such reviews

In Germany substances that are, or contain added substances, listed in the OSPAR List of Chemicals for Priority Action are not used in German waters.

In the Netherlands the use and discharge offshore of substances that are, or contain added substances, listed in the OSPAR List of Chemicals for Priority Action ceased in 2004. In 2010, Dutch competent authorities were approached with request for permits to use and discharge offshore pipes dopes under circumstances where there were no alternatives to guarantee the safety of the operations. The current Dutch legislation, which is modelled on OSPAR Recommendation 2005/2, does not allow any exemptions (see §2.2).

The United Kingdom developed a National Plan for the phase-out of chemicals which attract a substitution warning. This plan included the phase-out of discharges of chemicals that are, or contain added substances, listed in the OSPAR List of Chemicals for Priority Action, and specified that such discharges should be phased-out by the deadline of 1 January 2010. In 2009, the UK offshore industry approached the offshore licensing and environmental regulator (UK Department of Energy and Climate Change-DECC) to discuss the continued use of two pipe / casing dopes containing lead. The United Kingdom considered that there was a valid safety case for the use of these dopes for specific offshore operations, and informed the OSPAR Industry Committee (OIC) meeting in 2010 accordingly (see §2.2).

Where the phasing-out of such offshore chemicals is being achieved in some other way, the nature of those other means, and the progress with them

In Germany substances that are, or contain added substances, listed in the OSPAR List of Chemicals for Priority Action are not used in German waters.

In the Netherlands the use and discharge offshore of substances that are, or contain added substances, listed in the OSPAR List of Chemicals for Priority Action ceased in 2004.

In the United Kingdom none of the specific operations that necessitated the use of pipe / casing dopes containing lead included the planned discharge of the dopes. The United Kingdom therefore took the view that planned discharges would be negligible and unplanned discharges would be trivial. However, risk assessments for the use of dopes are based on an assumed percentage discharge (10%), and as it cannot be guaranteed that there will be zero discharge, the United Kingdom decided to inform the OIC meeting in 2011 that it had not fully implemented OSPAR Recommendation 2005/2, but the United Kingdom invited OIC to consider whether the continued use of these pipe / casing dopes for specific offshore operations satisfied the requirements of OSPAR Recommendation 2005/2 (see §2.2).

2.2 Pipe dopes containing lead

At OIC 2010 the United Kingdom submitted a paper advising OIC that the United Kingdom would continue to authorise the use of pipe / casing dopes containing lead for specific offshore operations, pending development of technically and environmentally acceptable alternatives.

At OIC 2011 discussion was held on the differing reporting strategies of Norway and the United Kingdom in relation to the use of pipe dopes containing lead. Norway and the United Kingdom both confirmed that operators were only using pipe dopes containing lead under circumstances where there were not planned discharges. Norway had reported in these cases zero discharges, whereas the United Kingdom had used the standard default factor for the permitting and reporting of pipes dopes. The United Kingdom informed the meeting that it would amend its reporting procedures for future uses of the pipe dopes that did not involve any planned discharges to indicate that is zero discharge. The Netherlands confirmed that its competent authorities had been approached with requests for permits to use and discharge pipes dopes.

2.3 Key findings

Based on the information received the following findings and shortcomings are summarised here:

- a. Denmark, France, Germany, Ireland, Spain and the Netherlands have not issued any new authorisations for the discharge of offshore chemicals that are, or contain added substances, listed in the OSPAR List of Chemicals for Priority Action;
- b. Denmark, France, Germany, Ireland, Spain and the Netherlands have phased-out the discharge of offshore chemicals that are, or contain added substances, listed in the OSPAR List of Chemicals for Priority Action;
- c. Norway reported the continued discharge of a chemical containing an added substance listed in the OSPAR List of Chemicals for Priority Action. This chemical was a hydraulic fluid containing approximately 3% Di-2-ethylhexylphtalate (DEHP), the phase-out of which will extent into 2010, beyond the deadline set out by OSPAR Recommendation 2005/2 (1 January 2010);
- d. Norway and the United Kingdom have reported the continued use of two chemicals (pipes dopes) containing an added substance (lead) listed in the OSPAR List of Chemicals for Priority Action. These two chemicals were however notified and approved prior to OSPAR Recommendation 2005/2 taking effect and are used for specific offshore operations under circumstances where there are not planned discharges.

ANNEX 1 – Implementation Reports

Appendix 1

Implementation report from DENMARK concerning OSPAR Recommendation 2005/2

1. Implementation Report on Compliance

Year of Report:	2010
Country:	DENMARK

Reservation applies	No
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Is measure applicable in your country?	Yes
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If not applicable, then state why not (e.g. no relevant uses or discharges of offshore chemicals)

Means of Implementation of the measure in § 3.1 of the Recommendation (ban on new authorisations of discharge of offshore chemicals):	by legislation	by administrative action	by negotiated agreement
	No	Yes	Yes

Please provide information on:

- a. specific measures taken to give effect to this measure;

It has since 2005 been a part of the Danish National Offshore Action Plan that: “By no later than the end of 2005, operators must have stopped discharges of all “black“ chemicals”. “Black” chemicals are identical to Chemicals that are, or contain Added Substances, listed in the OSPAR 2004 List of Chemicals for Priority Action. The goal was reached for both use and discharge in 2005.

- b. any special difficulties encountered, such as practical or legal problems, in the implementation of this measure;

The use and discharge of offshore chemicals for operations at the Faroe Island has been reported together with the Danish data. Operations have taken place at the Faroe Islands for the years 2001, 2006 and 2008. For 2008 it has been reported that for the Faroe Islands the use and discharge of “black” offshore chemicals have been 10 kg and 1 kg respectively.

- c. any reasons for not having fully implemented this measure should be spelt out clearly and plans for full implementation should be reported.

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Means of Implementation of the measure in § 3.2 of the Recommendation (phase-out of discharge of offshore chemicals):

	by legislation	by administrative action	by negotiated agreement
	No	Yes	Yes

Please provide information on:

- a. any programme of review of authorisations for the discharge of offshore chemicals consisting of, or containing added substances, listed in the OSPAR 2004 List of Chemicals for Priority Action, and the progress of such reviews;

See entries above.

- b. where the phasing-out of such offshore chemicals is being achieved in some other way, the nature of those other means, and the progress with them.

See entries above.

Appendix 2

Implementation report from GERMANY concerning OSPAR Recommendation 2005/2

1. Implementation Report on Compliance

Year of Report:	2010
Country:	Germany

Reservation applies

Is measure applicable in your country?

If not applicable, then state why not (e.g. no relevant uses or discharges of offshore chemicals)

Means of Implementation of the measure in § 3.1 of the Recommendation (ban on new authorisations of discharge of offshore chemicals):	by legislation	by administrative action	by negotiated agreement
	Yes	No	No

Please provide information on:

- a. specific measures taken to give effect to this measure;
No specific measures have been taken to give effect to this measure in Germany.
- b. any special difficulties encountered, such as practical or legal problems, in the implementation of this measure;
No difficulties encountered so far in the implementation of this measure.
- c. any reasons for not having fully implemented this measure should be spelt out clearly and plans for full implementation should be reported.
Germany has fully implemented this measure.

Means of Implementation of the measure in § 3.2 of the Recommendation (phase-out of discharge of offshore chemicals):	by legislation	by administrative action	by negotiated agreement
	Yes	No	No

Please provide information on:

- a. any programme of review of authorisations for the discharge of offshore chemicals consisting of, or containing added substances, listed in the OSPAR 2004 List of Chemicals for Priority Action, and the progress of such reviews;
Substances are not used in German waters.
- b. where the phasing-out of such offshore chemicals is being achieved in some other way, the nature of those other means, and the progress with them.
See Item a) above.

Implementation report from IRELAND concerning OSPAR Recommendation 2005/2

1. Implementation Report on Compliance

Year of Report:	2010
Country:	IRELAND

Reservation applies

Is measure applicable in your country?

If not applicable, then state why not (e.g. no relevant uses or discharges of offshore chemicals)

Means of Implementation of the measure in § 3.1 of the Recommendation (ban on new authorisations of discharge of offshore chemicals):	by legislation	by administrative action	by negotiated agreement
	No	Yes	No

Please provide information on:

- a. specific measures taken to give effect to this measure;

All substances proposed for discharge are checked against the List of Chemicals for Priority Action.

- b. any special difficulties encountered, such as practical or legal problems, in the implementation of this measure;

No relevant substances have been identified to date.

- c. any reasons for not having fully implemented this measure should be spelt out clearly and plans for full implementation should be reported.

Means of Implementation of the measure in § 3.2 of the Recommendation (phase-out of discharge of offshore chemicals):	by legislation	by administrative action	by negotiated agreement
	No	Yes	No

Please provide information on:

- a. any programme of review of authorisations for the discharge of offshore chemicals consisting of, or containing added substances, listed in the OSPAR 2004 List of Chemicals for Priority Action, and the progress of such reviews;
See entries above.

- b. where the phasing-out of such offshore chemicals is being achieved in some other way, the nature of those other means, and the progress with them.

See entries above.

Implementation report from NORWAY concerning OSPAR Recommendation 2005/2

1. Implementation Report on Compliance

Year of Report:
 Country:

Reservation applies

Is measure applicable in your country?

If not applicable, then state why not (e.g. no relevant uses or discharges of offshore chemicals)

Means of Implementation of the measure in § 3.1 of the Recommendation (ban on new authorisations of discharge of offshore chemicals):	by legislation	by administrative action	by negotiated agreement
	Yes	Yes	No

Please provide information on:

- a. specific measures taken to give effect to this measure;

The Norwegian Zero Discharge goal included the phase out of discharge of priority substances by the 1st of January 2006. Followed up when issuing discharge permits and assessing yearly discharge reports from the operators.

- b. any special difficulties encountered, such as practical or legal problems, in the implementation of this measure;

In 2009 58 kg of priority substances were discharged. The whole amount is from one source which is a subsea hydraulic system with normal leakage when operating vents. This is a large system which was originally filled with a hydraulic fluid containing approximately 3% Di-2-ethylhexylphthalate (DEHP). Because of the size of this system it has been too difficult to exchange all the fluid and Klif has accepted a gradual phase out with the refilling of a new compatible hydraulic fluid with no priority chemicals. The period of discharge of this hydraulic fluid will extend the phase out year 2010, but the yearly discharge will gradually diminish.

The use of chemicals with priority substances as shown in the table below is connected to pipe dope with lead. These pipe dopes have been used as back up chemicals by two installations in 2009 when having problems with breakage of threads. No planned discharge of pipe dopes containing lead has been permitted.

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Table 1. Use and discharge of priority substances on the NCS 2005-2009

	2005	2006	2007	2008	2009
Use (kg)	1032	594	497	146	19,6
Discharge (kg)	3,3	6,6	0,6	140*	58

***117 kg copper in pipe dope (a national priority substance until 2008)**

- c. any reasons for not having fully implemented this measure should be spelt out clearly and plans for full implementation should be reported.

Means of Implementation of the measure in § 3.2 of the Recommendation (phase-out of discharge of offshore chemicals):

	by legislation	by administrative action	by negotiated agreement
	Yes	Yes	No

Please provide information on:

- any programme of review of authorisations for the discharge of offshore chemicals consisting of, or containing added substances, listed in the OSPAR 2004 List of Chemicals for Priority Action, and the progress of such reviews;
- where the phasing-out of such offshore chemicals is being achieved in some other way, the nature of those other means, and the progress with them.

Appendix 5

Implementation report from THE NETHERLANDS concerning OSPAR Recommendation 2005/2

1. Implementation Report on Compliance

Year of Report:	2010
Country:	THE NETHERLANDS

Reservation applies

Is measure applicable in your country?

If not applicable, then state why not (e.g. no relevant uses or discharges of offshore chemicals)

Means of Implementation of the measure in § 3.1 of the Recommendation (ban on new authorisations of discharge of offshore chemicals):	by legislation	by administrative action	by negotiated agreement
	Yes	No	No

Please provide information on:

- a. specific measures taken to give effect to this measure;
No specific measures have been taken to give effect to this measure in the Netherlands.
- b. any special difficulties encountered, such as practical or legal problems, in the implementation of this measure;
No difficulties encountered so far in the implementation of this measure.
- c. any reasons for not having fully implemented this measure should be spelt out clearly and plans for full implementation should be reported.
The Netherlands have fully implemented this measure.

Means of Implementation of the measure in § 3.2 of the Recommendation (phase-out of discharge of offshore chemicals):	by legislation	by administrative action	by negotiated agreement
	Yes	No	No

Please provide information on:

- a. any programme of review of authorisations for the discharge of offshore chemicals consisting of, or containing added substances, listed in the OSPAR 2004 List of Chemicals for Priority Action, and the progress of such reviews;
The use and discharge of LCPA substances offshore the Netherlands have ceased already in 2004. In 2010 some operators in the Netherlands approached the NL Competent

authorities with requests for permits to use and discharge of LCPA substances mixed in pipe dopes. According to these operators the use these pipe dopes is needed in special circumstances where there are no alternatives to guarantee the safety of the operations. The current legislation, which is based on the OSPAR Recommendation 2005/2, does not allow any exemptions. However the United Kingdom informed the Offshore Industry Committee in 2010 that the UK is also phasing with the fact that pipe dopes containing LCPA substances are needed due to safety reasons. So the Netherlands propose the OIC in 2011 to discuss this possibility.

- b. where the phasing-out of such offshore chemicals is being achieved in some other way, the nature of those other means, and the progress with them.

As reported here above the use and discharge of LCPA substances already ceased in 2004.

Appendix 6

Implementation report from THE UNITED KINGDOM concerning OSPAR Recommendation 2005/2

1. Implementation Report on Compliance

Year of Report:	2010
Country:	UNITED KINGDOM
Reservation applies	No
Is measure applicable in your country?	Yes

If not applicable, then state why not (e.g. no relevant uses or discharges of offshore chemicals)

Means of Implementation of the measure in § 3.1 of the Recommendation (ban on new authorisations of discharge of offshore chemicals):	by legislation	by administrative action	by negotiated agreement
	No	Yes	Yes

Please provide information on:

- a. specific measures taken to give effect to this measure;

Policy decision implemented by administrative action and negotiated agreement (the UK chemical certification procedure and a UK National Plan). The UK has not issued any new authorisations for offshore chemicals that are, or contain added substances, listed in the OSPAR 2005 List of Chemicals for Priority Action, i.e. it has not approved any new chemicals for offshore use, but it has continued to permit two offshore chemicals that were notified and approved prior to OSPAR Recommendation 2005/2 coming into force.

- b. any special difficulties encountered, such as practical or legal problems, in the implementation of this measure;

No legal or practical difficulties were encountered in relation to new authorisations, but the UK has continued to issue new permits for the use of two pipe dopes, which are effectively two versions of the same offshore chemical.

- c. any reasons for not having fully implemented this measure should be spelt out clearly and plans for full implementation should be reported.

The UK has not fully implemented this measure if 'authorisation' includes the permitting of chemicals that were notified and approved prior to OSPAR Recommendation 2005/2 coming into force.

Means of Implementation of the measure in § 3.2 of the Recommendation (phase-out of discharge of offshore chemicals):

by legislation	by administrative action	by negotiated agreement
No	Yes	Yes

Please provide information on:

- a. any programme of review of authorisations for the discharge of offshore chemicals consisting of, or containing added substances, listed in the OSPAR 2004 List of Chemicals for Priority Action, and the progress of such reviews;

The UK developed a National Plan for the phase-out of chemicals which attract a substitution warning. This plan included the phase-out of discharges of chemicals that are, or contain added substances, listed in the OSPAR List of Chemicals for Priority Action, and specified that such discharges should be phased-out by the deadline of 1 January 2010. Under the national Plan, operators are required to report progress annually, to confirm the trials that have been undertaken to test alternative chemicals and the chemicals that have been replaced, and to provide details of the replacement chemicals and future replacement strategies. In 2009, the UK offshore industry approached DECC, the offshore licensing and environmental regulator, to discuss the continued use of two pipe / casing dopes containing lead. The UK subsequently submitted a paper to the Offshore Industry Committee (OIC) meeting in 2010, advising the Commission and OIC that the UK had accepted a justification provided by UK offshore industry for the continued use of pipe / casing dopes containing lead. The UK considers that there is a valid safety case for the use of these dopes for specific offshore operations, and informed the Commission and OIC that it will continue to authorise the use of these offshore chemicals for those operations pending development of technically and environmentally acceptable alternatives.

- b. where the phasing-out of such offshore chemicals is being achieved in some other way, the nature of those other means, and the progress with them.

The specific operations that necessitate the use of pipe / casing dopes containing lead were detailed in the paper submitted to OIC 2010, and none of those operations includes the planned discharge of the dopes. The operations are either likely to result in the dopes remaining down-hole, or the dopes being returned with the drilling fluids or production streams for treatment on the installation or onshore. Care is also taken during the application of these dopes, to prevent excess material being washed off during deployment of the drilling or casing. The UK therefore takes the view that planned discharges will be negligible and unplanned discharges will be trivial. However, risk assessments for the use of dopes are based on an assumed percentage discharge, and the UK continues to use that reporting protocol for all uses of pipe / casing dopes. As it cannot be guaranteed that there will be zero discharge, the UK decided to inform the Commission and OIC that it had not fully implemented the recommendation, but the UK would encourage OIC to consider whether the continued use of these pipe / casing dopes for specific offshore operations satisfies the requirements of the recommendation.



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