



Summary of Comments Received During the First Consultation for the Offshore Oil and Gas Development EHS Guideline

GENERAL

- Integrate hydraulic fracturing into the document as it is relevant for offshore oil and gas development.
- Incorporate requirements for well control and blow out prevention, including performance expectations and technological specifications.
- Emphasize the relative environmental risks posed by different offshore oil and gas development activities.
- Recommend more stringent requirements for discharges and noise (air traffic, construction, operations) where site-specific conditions warrant, e.g., development in extreme conditions, in sensitive areas including marine mammal breeding, feeding or migration habitat, or where marine discharge of drilling muds would impact the food chain.
- Elaborate on the timing and process, including public engagement, for preparation of spill response plans, including oil spill trajectory modelling.
- Identify good practices with regard to off-shore storage facilities, product loading, tanker characteristics (double hull), tanker traffic.

AIR EMISSIONS

- Reflect CO₂ emissions level with a new threshold of 25,000 tons as opposed to what is currently stated under the Air Emissions section which is 100,000 tons CO₂.
- Include sub-headings on Venting and Flaring section to distinguish guidelines applicable to normal operations or emergency/upset conditions.

WASTEWATERS

- Include requirements related to discharge to the sea as an option for produced water management offshore
- Specify offshore discharge criteria
- Do not exclude the most common management option for spent water-based drilling fluids (i.e., discharge to the sea)

SPILLS

- Include details on the minimum equipment needed to respond to an expected spill (according to a previous spill probability analysis).
- Include models that are "internationally recognized".



DECOMMISSIONING

- No installation or structure should be installed unless it is designed such that its entire removal is feasible.
- It is inappropriate to reference OSPAR decisions—at the very most, only guidance can be taken from OSPAR decisions.

OCCUPATIONAL HEALTH AND SAFETY

- Emphasize importance of living conditions while working offshore. Maximum number of days out and social activities may be able to help on being isolated and stuck together for a certain amount of time.

FIRE AND EXPLOSION PREVENTION AND CONTROL

- The requirement on passive fire protection is strict. Especially passive fire protection between rooms is not risk-based and not reasonable. Air quality is not really a safety issue, but an environmental issue. The requirements in this part should be included in Fire and Explosion Protection.

HAZARDOUS MATERIALS

- Include requirements related to NORM as several countries have statutorily specified requirements

COMMUNITY HEALTH AND SAFETY

- It is inappropriate to expect every platform in a multi-platform development to have its own dedicated standby vessel.

OCCUPATIONAL HEALTH AND SAFETY GUIDELINES

- Improve the composition of the Safety and Health part by integrating more risk based approach (or goal setting approach) rather than prescriptive