



INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

MEMORANDUM

TO: Distribution

FROM: Alan Spackman, Vice President, Offshore Technical and Regulatory Affairs

SUBJECT: Report on the 12th meeting of the OPRC-HNS Technical Group

DATE: 15 July 2011

The 12th meeting of the IMO's Technical Group under the International Convention on Oil Pollution Preparedness, Response and Co-operation (OPRC-HNS TG 12) was held from 4 to 8 July 2011, under the Chairmanship of Mr. Alexander von Buxhoeveden (Sweden). It was attended by delegations from 23 Member nations, three intergovernmental organizations, two regional pollution response organizations and six non-governmental organizations. The International Association of Drilling Contractors was not represented.

Matters addressed that may be of interest to the offshore oil and gas industries included:

Updating of IMO dispersant guidelines

There were three documents submitted on the topic of dispersants. The first reported on the progress made in updating the IMO dispersant guidelines by the correspondence group established at the previous session. The second outlined the results of recent research on dispersants arising from the **Deepwater Horizon** incident. The last was the new "Guidelines on the use of dispersants for combating oil pollution at sea in the Mediterranean region", recently agreed by the Meeting of the Focal Points of the Regional Marine Pollution Emergency Response Centre for the Mediterranean Sea (REMPEC).

The Group agreed in principle to the division of the guidelines into stand-alone parts, as follows:

- Part I – Basic information on dispersants and their application;
- Part II – Outline for a national policy on the use of dispersants: proposed template for national policy on the use of dispersants;
- Part III – Operational and technical sheets; and
- Part IV – Sub-sea dispersant application.

The Group debated whether Part IV could be included at this stage, given that information and the results relating to the application of sub-sea dispersants in the **Deepwater Horizon** incident are still pending and will be for some time. It also debated whether information on the use of dispersants in ice-infested waters should be included or excluded from the guidelines, recognizing that under polar conditions the issues involved and the approach to their application would be very different. Having considered the advantages and disadvantages of addressing the topic in these guidelines and having also noted that work on the use of dispersants in Arctic waters was currently underway within the Arctic Council, the Group agreed that the topic should be excluded.

The Group reestablished the Correspondence Group under the leadership of France¹ and Canada² and instructed it to:

- .1 further develop the guideline in four parts;
- .2 consider the structure of the guidelines developed by REMPEC as a possible base document for initiating this work;
- .3 retitling Part III as 'Operational and technical sheets for surface application of dispersants', to make a clear differentiation from Part IV; and

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2 Dr Ken Lee (ken.lee@dfo-mpo.gc.ca)

- .4 review the "IMO Field guide for oil spill response in tropical waters", the "IMO/FAO Guidance on managing seafood safety during and after oil spills", identify what consequential changes may be required, if any.

Operational guidelines on sunken and submerged oil assessment and removal techniques

The Group considered a revised draft of the "Operational guidelines on sunken and submerged oil assessment and removal techniques", prepared by its Correspondence Group. The Group:

- Noted that the section on case studies was confined only to vessel incidents and recommended that this be extended to include non-vessel incidents.
- Reviewed the section on *in-situ* burning and agreed that it should be shortened in light of the Group's work on the development of a "guideline on oil spill response – offshore *in-situ* burning", which would more adequately cover the topic and which could be referenced.
- Agreed that a section on occupational health and safety was needed, particularly in relation to diver safety, since divers are widely used to recover submerged oil and the appropriate practices and equipment are not always employed when such work is undertaken in hazardous conditions and contaminated water.
- Agreed that a section on toxicity was not needed and should be removed, while the section on R&D was indeed useful and should be developed further if possible.

The Group reestablished the Correspondence Group, under the leadership of the United Kingdom³ to progress the document.

Potentially polluting wrecks

The Group considered documents submitted by the United States providing information on potentially polluting wrecks in US waters and by Italy providing information on European guidelines for potentially polluting shipwrecks, which could be used as the basis for the development of technical guidelines on potentially polluting shipwrecks. The Group concluded that more information was needed to further assess the matter and agreed to propose that the Marine Environment Protection Committee (MEPC) should invite Member States to submit information on wrecks of interest to future meetings of the Group.

Guideline for oil spill response offshore in-situ burning

The Group considered the draft guideline prepared by its Correspondence Group and:

- Agreed that the guideline would be intended for use by oil companies and national authorities, including lead agencies involved in the management of oil pollution incidents, as well as others involved in contingency planning;
- Agreed that a certain level of operational guidance should be given that could also be used by those involved in response operations;
- Noted that additional information should be included on the potential adverse effects of the use of *in-situ* burning, such as atmospheric pollution and the effects on sea life and benthic communities of burn residues.
- Agreed that information on the disadvantages and limitations of using such an approach should also be included, in order to provide sufficient information to assist the decision-making process.
- Agreed that the document should be titled, for reasons of consistency "IMO in-situ burning guidelines" and that a chapter on the use of *in-situ* burning in polar conditions should be included.

In order to progress the work, with a view to finalizing the guideline, the Group reestablished the correspondence group under the leadership of the United States.⁴

Manual on chemical pollution to address legal and administrative aspects of HNS incidents

The Group instructed the Secretariat to work with the delegation of Canada and the IOPC Funds to finalize the text of the Manual with a view to reaching final agreement at the next session.

3 Mr. Neil Chapman (neil.chapman@mcga.gov.uk)

4 Mr. Kurt Hansen (Kurt.A.Hansen@uscg.mil)

Guidance on the safe operation and performance standards of oil pollution combating equipment

The Group considered the first draft of the "Guidance on safe operation and performance standards of oil pollution combating equipment", as well as the findings of a literature review conducted by the Islamic Republic of Iran, related to this guidance.

The Group noted that the draft addressed two separate issues: performance standards of equipment from a design and manufacturing perspective and guidelines or standards for the safe operation of oil pollution response equipment. Recognizing that the first element was beyond the Group's competence, the Group agreed that the content of the guidance should be refocused to address best practices for the safe operation of equipment based on relevant hazards during oil spill response.

Having noted the work of the International Organization for Standardization (ISO) and the American Society for Testing and Materials (ASTM) in this area and the "IPIECA Oil spill responder safety guide", the Group requested:

- .1 the Secretariat to follow up with ISO and ASTM to obtain additional information on relevant standards related to the safe operation of equipment and forward this information to the Islamic Republic of Iran; and
- .2 the Islamic Republic of Iran to continue developing the guidelines.

Review of web content on OPRC-HNS-related information and Inventory of information, best practices and R&D on HNS preparedness and response

The Group endorsed the migration of the inventory of information resources on OPRC/HNS-related matters from the REMPEC website, where the information is currently hosted, to the new IMO website, where it will permanently reside. The Group also invited delegations to increase their efforts to provide contributions on OPRC/HNS-related information for the development and further expansion of the inventory of information resources, in particular any information on best practices and R&D on HNS preparedness and response.

Oil spill response in Arctic and cold climate conditions

The Group noted that there had been further delay in the production of the IPIECA/API document on "Oil Spill Response in Arctic and Cold Climate Conditions" due to diversion of resources in connection with the Gulf of Mexico incident. IPIECA indicated that it expected to have the document completed by the next session.

The Group further noted the multi-year \$(US) 20 million Arctic research project being initiated by the petroleum industry through the International Association of Oil & Gas Producers (OGP), which would address many of the topics currently under discussion or of interest to the Technical Group, such as the following five of the eleven project areas:

- .1 use of dispersants in ice conditions;
- .2 fate of oil under ice;
- .3 oil spill modeling in ice;
- .4 remote sensing and tracking of oil under ice; and
- .5 field testing.

The International Association of Oil & Gas Producers' Global Industry Response Group Overview

The Group noted the information presented by IPIECA on the International Association of Oil & Gas Producers' Global Industry Response Group activities, aimed at improved well incident prevention and response capability in order to reduce the likelihood and impact of future well incidents, as a follow up to the **Deepwater Horizon** incident. These included more specifically, developments on well engineering design and recommendations on well operations management, capping response and containment capability. The Group further noted the work being undertaken by the GIRG on dispersant use, response methodologies, risk assessment models, *in-situ* burning, and the benefits of real-time exercises to test national and industry oil spill response plans to improve oil pollution prevention and response capabilities.

Proposed guideline for oily water discharge from response vessels, arising from decanting of collected oil on board ships during major oil pollution response operations

Malta proposed the development of a guideline for oily water discharge from response vessels, arising from decanting of collected oil on board ships during major oil pollution response operations. Such a guideline would provide a rationale for allowing the exceptional discharge of oily water mixtures above the usual MARPOL limits, under controlled conditions, given the oiled state of the seawater, on the basis of the Net Environmental Benefit. This guideline would aim to facilitate the decision-making process during a major oil spill response. Malta indicated its intention of introducing this proposal as an oral intervention at MEPC 62.

Work program

The proposed planned outputs for the Group are as follows:

Description	Output	Target
Technical Co-operation implementation on OPRC and HNS	7.2.3.1	Ongoing
Manual on chemical pollution to address legal and administrative aspects of HNS incidents	7.1.2.11	2012
Operational guidelines on sunken and submerged oil assessment and removal techniques	7.1.2.16	2012
Updating IMO Dispersant Guidelines	7.1.2.20	2012
Guide on oil spill response in ice and snow conditions	7.1.2.19	2012
Guideline for oil spill response – offshore <i>in-situ</i> burning	7.1.2.21	2012
Guidance on the safe operation and performance standards of oil pollution combating equipment		2012
Review and update of OPRC Model Courses		2013

Prioritization of work related to HNS and oil

The Group designated the following as high-priority work for HNS:

- .1 risk assessment methodologies;
- .2 use of dispersants in the case of an HNS incident;
- .3 monitoring, forecasting and detection equipment;
- .4 incident management and response management systems;
- .5 elements for HNS contingency planning;
- .6 assessment of behavior and toxicity with available and practically deployable response options;
- .7 HNS "How to Do It" – development of national response system infrastructure;
- .8 physical properties and behavior of HNS;
- .9 developing a model for tracking the trajectory and dispersion of chemicals in water; and
- .10 other priority areas identified:
 - .1 ecological risk assessment;
 - .2 risk and assessment/best practice, data collection – main shipping HNS routes;
 - .3 health and safety issues;
 - .4 description of elements of a national response system;
 - .5 HNS identification procedures; and
 - .6 response techniques in shallow waters.

The following priority areas were identified for oil:

- .1 liability and compensation and claims;
- .2 response in ice and snow – mechanical, dispersant, ISB;
- .3 risk analysis methodologies; and
- .4 other priority areas identified:

- .1 in-situ burning – general;
- .2 dispersant and in-situ burning for platform spills;
- .3 contingency planning for offshore units, sea ports, and oil handling facilities;
- .4 contingency planning for vessels and platforms; and
- .5 plans and formats for contingency planning.

Due to time constraints, the Group was not in a position to consider the topics in sufficient depth nor able to properly prioritize the full range of topics before it. The Group concluded that further analysis was needed and invited MEPC 62 to note these preliminary results of the prioritization exercise.

Arrangements for future sessions

The Group agreed to the exceptional scheduling of its 13th during the week following MEPC 63, from 5 to 9 March 2012, subject to the Committee's concurrence.

Election of the Chairman and Vice-Chairman

The Group unanimously re-elected Mr. Alexander von Buxhoeveden (Sweden) as the Chairman and Mr. Woo-Rack Suh (Republic of Korea) as the Vice-Chairman for the year 2012, subject to the approval of the Committee.

The complete report of the Group is available on the IMO portion of the IADC Website at: <http://www.iadc.org/committees/offshore/IMO.html>. IMO-issued documents are password protected. IADC members should contact me to obtain the password.

Please feel free to contact me by phone (+1 713 292 1964) or e-mail (alan.spackman@iadc.org) with any questions you may have regarding this report.