



ODE Asset Management Limited

OSPAR Public Statement - 2020

Document Number: SHEQ-4-8024-01

CONTACT DETAILS

ODE Asset Management Ltd
 St George's House, 5 St George's Road
 Wimbledon, London SW19 4DR

T +44 (0) 20 8481 1190

F +44 (0) 20 8546 4346

www.ode-ltd.co.uk

REVISION

Rev.	Date	Issued by	Approved by	Reason for revision
B01	May 2021	JS	JO	Issue for Information

© Offshore Design Engineering Ltd. 2020

All copyright and related rights in this document belong to Offshore Design Engineering Ltd. All rights are reserved.

You may not copy or use this document other than for the purposes of evaluating this proposal or use any of the designs or information contained herein until such time as you have entered into a contract with us for its use. You shall not disclose this document or its contents to any third party without our prior written consent.

This notice is governed by English law.

TABLE OF CONTENTS

1	Introduction	5
2	Report Objective.....	5
3	About ODEAM.....	5
4	Environmental Management System	6
5	2020 Environmental Performance.....	10
5.1	Overview of 2020 Activities.....	10
5.2	Environmental Aspects.....	10
5.3	Environmental Performance	12
6	2021 Environmental Objectives.....	14

Abbreviations

ASEMS	Asset safety & environment management system
BEIS	(Department of) Business, Energy & Industrial Strategy
BMS	Business management system
ECE	Environmentally critical element
EEMS	Environmental emissions monitoring system
EMS	Environmental management system
ETS	Emissions trading scheme
GHG	Greenhouse gas
HSE	Health, safety & environment
HSE	Health & Safety Executive
IPPC	Integrated pollution prevention & control
MEI	Major Environmental Incident
NUI	Normally unattended installation
ODEAM	ODE Asset Management Limited
OGA	Oil & Gas Authority
OSPAR	Oslo Paris Agreement
PON1	Petroleum Operations Notification 1 (accidental spill notification)
SEMS	Safety & environmental management system
SHEQ	Safety, health, environment & quality
te	Metric tonne
UKCS	United Kingdom Continental Shelf

1 INTRODUCTION

Under OSPAR Recommendation 2003/5 to Promote the Use and Implementation of Environmental Management Systems (EMS) by the Offshore Industry, the Department for Business, Energy and Industrial Strategy (BEIS) requires all operators of offshore installations, including Well Operators, to produce a Public Statement to report their environmental performance. These Statements must be prepared on an annual basis (covering offshore installation activities carried out during the previous calendar year), made available to the public and copied to BEIS by 1st June of each year.

2 REPORT OBJECTIVE

In accordance with the requirements of OSPAR Recommendation 2003/5, this document reports on the environmental performance of ODE Asset Management Limited's (hereafter ODEAM) UK Continental Shelf (UKCS) operated offshore activities during 2020. It is focused on environmental issues associated with operations which were directly under the control of ODEAM and demonstrates how management systems in place seek to continuously improve environmental performance.

In May 2020 ODEAM assumed Duty Holder responsibilities for the Babbage installation in the Southern North Sea. ODEAM operates Babbage on behalf of NEO Energy.

3 ABOUT ODEAM

ODEAM is a private company and an integral part of the DORIS Group, celebrating 55 years in the Oil & Gas business in 2020. ODEAM is recognised as a worldwide leader in offshore solutions for subsea, pipelines, fixed and floating facilities plus our onshore reception terminal and renewables capabilities.

ODEAM is headquartered in London with business centres in Great Yarmouth and Aberdeen. The Great Yarmouth base has been established for over two decades providing direct UK Southern North Sea asset management support including offshore management, operations, integrity management and logistical support. In 2019 to physically provide closer local links, and to further facilitate expansion of Duty Holder/Operations and Engineering offering, new offices were established in Aberdeen to further support North Sea operations.

ODEAM's principal objective is to achieve maximum value from every asset with zero harm to people or the environment and to comply with regulations. ODEAM places the highest level of emphasis on Health, Safety and Environmental performance. Consideration of HSE forms an integral component of all activities from planning to operations, particularly with respect to minimising hazards whilst ensuring full compliance with regulatory requirements.

For further Company information please refer to our website: www.ode-ltd.co.uk

4 ENVIRONMENTAL MANAGEMENT SYSTEM

ODEAM is fully committed to working in an environmentally responsible manner to ensure that work is executed without accident or incident and to the requirements of our clients and applicable regulations. Underpinning our environmental commitment is the business management system which ensures that all work is undertaken correctly and in accordance with implemented systems and procedures. Doing work correctly first time ensures meeting environmental objectives. ODEAM's approach to environmental management is endorsed by all senior management. This underpins the positive environmental culture from senior management to operational support teams. Working in accordance with the management systems and controls is a condition of employment with ODEAM.

The ODEAM Safety & Environmental Management System (SEMS) is a component of the overall integrated Business Management System (BMS). The BMS incorporates a Safety, Health, Environment & Quality (SHEQ) Management System which is operated to satisfy the following key commitments:

- Considering the environment in our business decisions and minimising our adverse impact on the environment
- Not harming anyone as a result of our business activities
- Not damaging the health of anyone as the result of our business activities
- Establishing, maintaining, monitoring and continually improving our SHEQ Management Systems

All facilities are managed and operated by ODEAM in accordance with an Asset Safety & Environmental Management System (ASEMS) ensuring a consistent and proven framework of procedures, operating practices and Integrated Safe Systems of Work.

Each ASEMS is constructed around key elements of the BMS including policies, systems, procedures and guidance to allow ODEAM and its contractors to operate its assets including Babbage in accordance with legislation and to meet the ODE SHEQ Policy. In this way each ASEMS is an integral part of ODE Group's overall BMS.

The structure and content of the BMS ensures alignment with, and is certified to, the requirements of ISO 9001:2015 Quality management system, ISO 14001:2015 Environmental management system and ISO 45001:2018 Occupational health and safety management system. A recent re-certification exercise was successfully completed, and the certifications are valid until May 2024. The appointment of ODEAM as a Pipeline and Installation Operator has not been objected to by OGA, BEIS and the HSE.

The ODE Group (ODE Group and all subsidiaries including ODE AM) SHEQ policy lists commitments to SHEQ and is presented Figure 1 below. The ODE Group is committed to continually improving all core business systems and does so through regular (at least bi-annual) reviews, updates and feedback. The Plan, Do, Check, Act cycle in (Figure 2), enables continual improvement and a structured, risk-based approach to manage business processes and ensure the organisation is adequately resourced.

Key procedures included within the BMS governing the development of each ASEMS include the following:

- SHEQ-8004 Identification of Environmental Aspects and Significance Evaluation
- SHEQ-8024 Environmental Data Reporting Procedure
- SHEQ-8052 Waste Management Procedure
- SHEQ-8073 Oil Pollution Emergency Plan

Asset-specific procedures and plans are prepared accordingly to ensure compliance with overall objectives.

In addition to the SHEQ series of relevant procedures the ODEAM Maintenance Management System includes the requirement to identify and maintain Environmentally Critical Elements (ECEs) as necessary to ensure the prevention of a Major Environmental Incident (MEI).


SHEQ Policy

ODE Group companies provide project management, engineering, procurement and operational maintenance, integrity, installation and pipeline operator services for the design, construction, installation, operation and decommissioning of facilities for the oil and gas, petrochemical and renewable energy industries. We recognise that our long-term business success depends on our ability to effectively manage major accident hazards to protect the people that work for and with us, those that are affected by our activities and the environment in which we work, while continually improving the quality of our services and products. We realise that the standard we expect can only be delivered by taking personal responsibility for SHEQ and working together, by setting clear objectives and maintaining open communication channels


Our commitment to **SHEQ** is a core value of the business and to deliver it we will: -

- Actively promote SHEQ as a **core value** by 'visible felt leadership' from all personnel in positions of authority within our business
- Practise the 7 Quality Management Principles: customer focus, leadership, engagement of people, process approach, improvement, evidence-based decision making and relationship management
- Comply with **legal, regulatory and other requirements** and work to adopt industry best practice applicable in the countries in which we operate
- Set **performance objectives**, measure results, assess and continually improve processes, services and product quality, by implementing an effective and externally certified **Business Management System**
- Ensure **effective and proactive management**, control, monitoring and review of all major accident hazards
- Ensure that **sufficient resources** are provided and that all employees, contractors and service providers' personnel are **trained and competent** to undertake their work safely
- Promote the health and wellbeing of our workforce and take action to prevent and control **work related ill health**
- Ensure that the principles of '**safe by design**', '**human factors**' and '**reduced environmental impact**' are embedded in all aspects of our service, including design, engineering and operations and maintenance
- Understand and consider how our activities **impact the environment** and work to minimise that impact, by preventing pollution, reducing our natural resource consumption, minimising emissions and the reduction, reuse and recycling of waste
- Undertake regular **emergency drills and exercises** to test our capability to respond quickly and effectively to any emergency or abnormal working condition
- Report and investigate all **health, safety and environmental incidents**, establish root causes and take appropriate actions to prevent recurrence
- **Communicate openly** with interested parties to ensure that our policies, standards, expectations and performance are understood
- **Review this Policy annually** for continued suitability.

All employees, contractors and service providers working at ODE Group companies controlled locations or performing activities on behalf of ODE Group companies at other sites are required to work in accordance with the requirements of the Business Management System or other appropriate systems that meet or exceed this standard and to intervene in any situation that has the potential to cause harm to an individual, asset, the environment or our reputation.



Peter Godfrey
Managing Director



Date: 01/01/21
Review date: 01/01/22

Figure 1 ODE SHEQ Policy

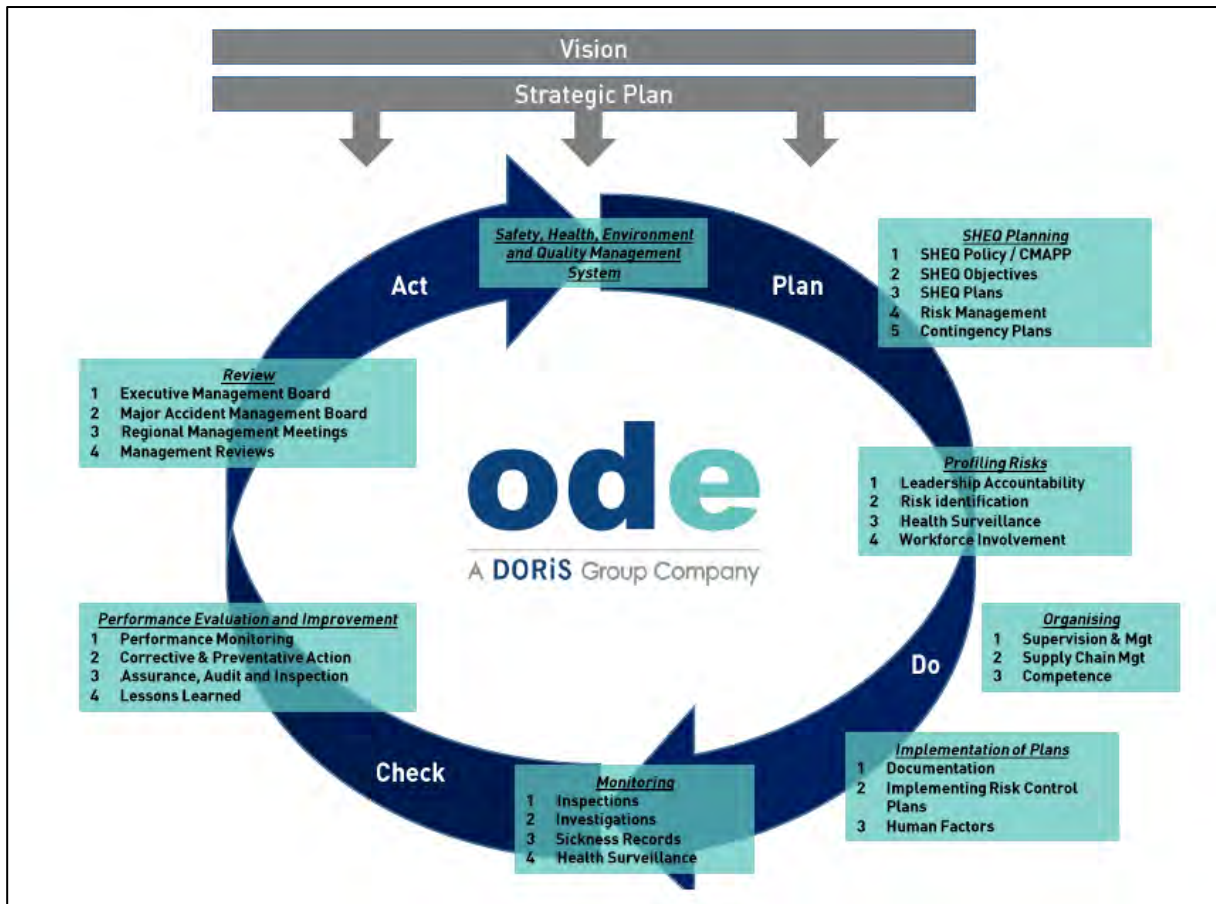


Figure 2 ODE Group Management Cycle - Plan, Do, Check, Act

5 2020 ENVIRONMENTAL PERFORMANCE

5.1 Overview of 2020 Activities

In May 2020 ODEAM assumed the role as Duty Holder for the Babbage NUI gas platform located in the Southern North Sea. ODEAM operate the Babbage gas platform on behalf of NEO Energy. Operation of the Babbage gas platform was the only offshore asset operated by ODEAM in 2020.

The Babbage field and platform locations are presented in Figure 3.

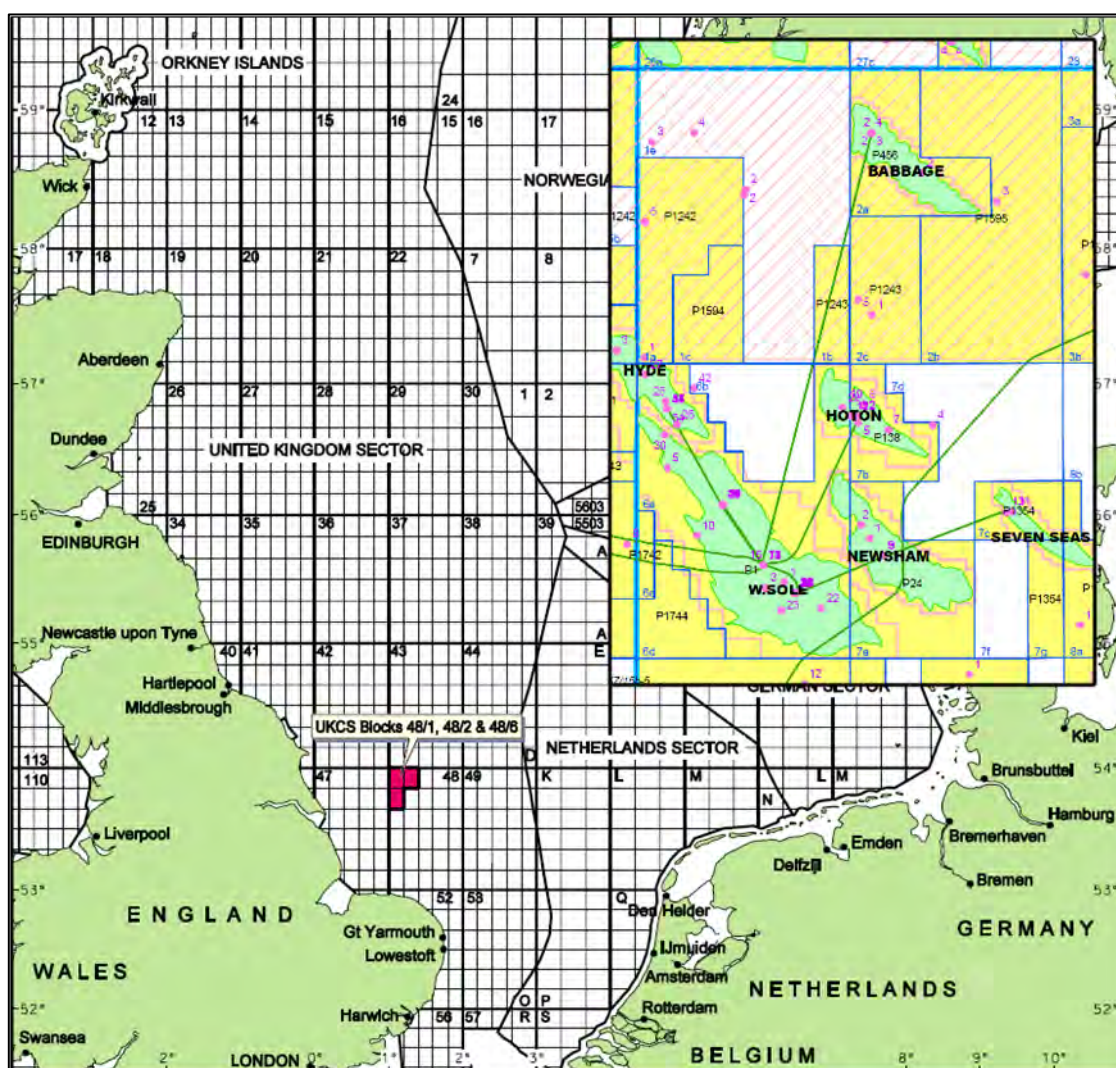


Figure 3 Babbage Field and Platform Location

5.2 Environmental Aspects

The Babbage ASEMS mandates the preparation and review of an asset-specific environmental aspects register in accordance with the requirements of the ODEAM Identification of Environmental Aspects and Significance Evaluation Procedure. Planned activities and potential unplanned events (e.g. accidental releases) associated with the operations were assessed for environmental risk against the ODEAM corporate risk matrix.

Development of the environmental aspects register required review of the following areas to ensure all aspects were captured for all planned and unplanned operation events:

- Work process flow and procedures
- Legal requirements/ non-statutory guidance notes
- General specifications and particular specifications
- Observations in site inspections
- Records of complaints and/or non-compliance
- Past monitoring records
- Records for Management reviews and/or environmental audits
- Permit application data
- Environmental approval documents (e.g. Environmental Impact Assessment documents)
- Outputs from risk identification workshops and studies

Against this background Babbage environmental aspects were classified into the following categories:

- Resources utilisation (including use of raw materials, energy, etc.)
- Waste management
- Air emissions
- Discharges to sea
- Noise and vibration nuisance
- Contamination (land/sea floor)
- Indirect impacts caused by suppliers, contractors or customers; and
- Others (flora & fauna, visual impact; community impact, transportation impact, nuisance, site security)

A total of 21 environmental aspects were identified and assessed for 2020. All aspects were assessed as an acceptable Moderate or Minor environmental risk following the application of mitigation and control measures. No unacceptable High, or Very High, environmental risks were identified. Associated environmental risk reduction activities included:

- Compliance, monitoring and reporting in accordance with all environmental permits, consents and other regulatory requirements

- Liaison with environmental regulators and stakeholders
- Coordination and liaison with the Babbage Licensee (NEO Energy)
- Installation-specific emergency response plans in place
- Oil Pollution Emergency Plan in place
- All diesel and chemical bunkering operations undertaken in daylight and in good weather conditions (i.e. when manned)

5.3 Environmental Performance

ODEAM monitors and report on atmospheric emissions, the discharge of oil in produced water, the use and discharge of chemicals, the disposal of waste and hydrocarbon and chemicals spill incidents. This section presents the information that was reported via the online Environmental and Emissions Monitoring System (EEMS) for operations during 2020.

5.3.1 Atmospheric Emissions

Greenhouse gas (GHG) emissions are generated at the Babbage platform due to power generation (running of diesel generator) and transportation (helicopter transfers). In addition, cold venting is periodically required for operational and maintenance reasons. GHG emissions are below the threshold for both Integrated Pollution Prevention & Control (IPPC) permitting and Greenhouse Gas Emissions Trading Scheme (ETS) requirements. Total GHG emissions for 2020 under ODEAM control, including combustion and cold venting of reservoir gas, were 267.3 te CO₂e.

5.3.2 Discharge of Chemicals

The Babbage platform employs a number of chemicals to assist the process, maintain system integrity and support maintenance operations. Chemicals are controlled under permit subject to the Offshore Chemical Regulations 2002. Chemicals included in the permit for year 2020 are quantified below, noting that whilst chemicals were used, zero discharge to sea occurred.

Chemical		Used, kg	Discharged, kg
Name	Function Group		
AFMR20400A	ANTIFOAMHYD	63.0	0.000
BIOC41000A	BIOCIDE	10.0	0.000
CORRTREAT 15571	CORRINHIB	4,632.0	0.000
FOAM20502A	OTHER	642.5	0.000
Hydrosure HD-5000	BIOCIDE	7.0	0.000
Methanol	GASHYDRINHIB	6,827.0	0.000
Oceanic HW540 E	HYDFLUID	100.0	0.000
Potassium chloride, KCL (all dilutions)	SHALEINHIB	9,700.0	0.000
SOBO S GOLD 08	DETERGENT	0.0	0.000

5.3.3 Discharge of Oil under OPPC Regulations

The Babbage platform holds an oil discharge permit under the OPPC regulations to allow for discharge of treated produced water to the sea. However, for the whole of 2020 the produced water treatment system was not in service and no discharges to sea occurred.

5.3.4 Waste

Wastes generated at the Babbage platform were all transported to shore for subsequent management by a licensed waste contractor in accordance with regulation and ODEAM waste management procedures. The fate and characteristics of generated wastes in 2020 was:

- Recycled – 11.72 te
- Waste to energy – 4.05 te
- Treatment – 8.37 te
- Special – 14.25 te
- Non-hazardous – 9.89 te

5.3.5 Accidental Events

In August 2020 a PON1 notification was raised for the accidental loss to sea of 85 kg of aqueous hydraulic fluid. A full investigation was conducted and the loss to sea was found to be caused by a weeping fitting on a remote-operated valve actuator. Following conclusion of the investigation the faulty equipment was replaced. Other similar equipment was also checked for integrity and found to be in good condition.

6 2021 ENVIRONMENTAL OBJECTIVES

Objectives to ensure the continued effectiveness of ODEAM environmental management and performance for 2021 include:

- Ensure full legislative and regulatory compliance
- Continue the review, communication, and internal audit of the ODEAM SEMS to ensure a suitable and robust system remains in place to manage Company operations in accordance with Company policies and statutory regulations
- Ensure a thorough identification of Company environmental risks and opportunities and the needs and obligations associated with stakeholders
- Undertake a full independent audit of the ODEAM EMS to ensure continued satisfaction of ISO 14001:2015 requirements
- Consultation with JNCC and OPRED as required with respect to new permit applications
- Ensure appropriate communications are held with regulators and environmental stakeholders as necessary to support ongoing and new Duty Holder responsibilities
- Ensure all necessary submissions are made to regulators to support the environmental consenting process for all new Duty Holder responsibilities
- Undertake S&E monitoring and management of contractors, suppliers and third-party support as required
- Schedule and ensure identified personnel undertake appropriate SHE training
- Ensure environmental risk assessments are completed for all major activities
- Ensure any environmental incidents are investigated and followed through to closure
- Implement strategy for achieving carbon net zero in accordance with Government targets