

UK Response to the ISA Standards and Guidelines Consultation

The UK thanks the LTC for all the work that has gone into developing these draft Standards and Guidelines and welcomes the consultation and the opportunity for stakeholder input during the process.

The UK supports the creation of Standards and Guidelines, as a means of assisting stakeholders in fulfilling their obligations which stem from the Regulations. While the Regulations will necessarily be high-level in places, the future accompanying Standards and Guidelines would provide an extra level of detail for Contractors to comply with their obligations.

We are aware that these draft documents refer to draft Regulations which have not yet been finalised and, in some cases, also refer to other Standards and Guidelines which may not yet have been drafted or agreed. The draft Standards and Guidelines will need to be reviewed again once the relevant exploitation Regulations have been agreed, and other relevant draft environmental Standards and Guidelines are available.

In relation to the draft Plan of Work document, it does not appear to elaborate on the sections of the draft Regulations relating to this issue. We are concerned that this may lead to confusion about the future interpretation of the Regulations as the Guideline as drafted does not provide any additional assistance, and in places even slightly departs from the Regulations as currently drafted. We would recommend that an updated draft of this Guideline would provide more detailed guidance on creating and submitting a Plan of Work beyond that already found in the draft Regulations, while, of course, remaining consistent with the draft Regulations.

In relation to the draft document on the Environmental Management Systems, we have provided more detailed comments in the attached template. As noted above, it will be necessary to revisit this text once other draft environmental Standards and Guidelines are available.

With regards to the draft Environmental Performance Guarantee document, we are aware that there are still some fundamental points to be considered in relation to the draft Regulations on this issue. It will therefore be useful to consider in more detail what Standard or Guideline could be offered on this topic once the relevant draft Regulations are clearer.

We look forward to the opportunity to contribute to further consideration of these issues in future.