**Instructions to operators and or new drilling owners**

**1. Offshore Safety**

According to the provisions of the **Safety and Health at Work (Safety of Offshore Operations Oil and Gas) Regulations 2015 (P.I. 424/2015)** which has transposed to Cyprus legislation the major part of the Directive 2013/30 / EC on Offshore Safety (OSD) the operator or owner of a new well shall submit to the Department of Labour Inspection (DLI) the following documents:

**1.1 Notification of well operations**

Regulation 17 of the above mentioned Regulations (Article 15 of the OSD) provides that the operator submits to the DLI a notification of well operations. The notification should be submitted three months before the commencement of the well operation. At the submission, a relevant fee of 1000 Euros should be paid.

The purpose of the notification is the presentation of the design of the well and the proposed well operation. The notification should contain information set out in Annex II Part 4 of the Regulations (Annex I, Part 4 of the OSD). The DLI examines the notification and submits comments.

**1.2 Report on major hazards for a non-production installation**

Regulation 15 of the above mentioned Regulations (Article 13 of the OSD) provides that the owner submits to the DLI three months before the commencement of the well, a report on major hazards for a non-production installation. At the submission a relevant fee of 6000 Euros should be paid.

The purpose of the report is the detailed presentation of the risks, the method of prevention of the risks and the facing of emergency situations.
Contains information set out in Annex II Part 3 of the Regulations (Annex I, Part 3 of the OSD). The DLI examines the report on major hazards and approves it or not.

The report on major hazards, inter alia, should include the following:

a) the corporate major accident prevention policy according to Regulation 21 paragraph 1 and Annex II, section 8 of the Regulations (in accordance with Article 19, paragraph 1 and Annex I, Part 8 of the OSD),

b) the safety and environmental management system or adequate description of this system in accordance with Regulation 21 paragraph 3 and Annex II, section 9 of the Regulations (Article 19 paragraph 3 and Annex I, Part 9 of the OSD),

c) the internal emergency response plan or adequate description of this plan in accordance to Regulations 16 and 30 and Annex II, Section 10 of the Regulations (Articles 14 and 28 and Annex I, Part 10 of the OSD) and
d) a description of the independent verification scheme in accordance to Regulation 19 and Annex II, Section 5 of the Regulations (Article 15 and Annex I, Part 5 of the OSD).

The «Health, Safety and Environment Case Guidelines for Mobile Offshore Drilling Units» guidelines issued by the International Association of Drilling Contractors are considered as adequate guidelines for producing the report on major hazards. The guidelines can be found on the following link: <http://www.iadc.org/iadc-hse-case-guidelines/>

Based on the above guidelines the DLI has prepared a methodology for the evaluation on the report on major hazards which can be found on the link:

[http://www.mlsi.gov.cy/mlsi/dli/dliup.nsf/All/53C289A8FCBF8C96C2257E21003B2F26/$file/Methodology\_Assessment\_Safety\_Report.pdf](http://www.mlsi.gov.cy/mlsi/dli/dliup.nsf/All/53C289A8FCBF8C96C2257E21003B2F26/%24file/Methodology_Assessment_Safety_Report.pdf)

**2. Safety and Health at Work**

According to the provision of the **Safety and Health Law 1996 to (2) 2015** and the **Management of Safety and Health at Work Issues Regulations 2002** the employer should perform a risk assessment and take all the appropriate measures to reduce all possible risks to personnel and other persons. Based on the above mentioned risk assessment should establish and maintain an appropriate health and safety management system. These legal acts have the provisions of EU Framework Directive on Safety and Health at Work (89/391/EEC). Note also that on offshore installations all the provisions of the **Minimum Requirements for Safety and Health at Work (Extractive Industries through Drilling)** Regulations of 2002 which have transposed the provisions of EU Directive 92/91/EEC are also applicable.

**3. Atmospheric Pollution Control**

According to the basic provisions of the **Atmospheric Pollution Control Laws of 2002 to 2013**, for the Drilling Operation activity and in the case where no combustion plant with thermal input of 15MW or more will be installed, Total **does not need** to submit any application for Air Emission Permit according to.

In addition, if any activity listed in Annex I of EU Directive 2010/75/EU on industrial emissions will take place, an application for an Industrial Emission Permit has to be submitted to DLI.

**4. Air Quality**

According to the basic provisions of **the Air Quality Law (Law No. 77(I)/2012)**, Cyprus has the obligation to submit every year a national emission inventory to the EU through the European Environment Agency (EEA) and to the Secretariat of the UN-ECE Convention on Long-range Transboundary Air Pollution (LRTAP Convention). According to Regulation 7 of the Air Quality (National Emission Ceilings for Certain Atmospheric Pollutants) Regulations of 2004, Cyprus shall establish emission inventories and projections using the methodologies agreed upon by the LRTAP Convention and is requested to use the EMEP/EEA Emission Inventory Guidebook 2013.

4.1. Within the above framework, upon completion of the drilling program, Cyprus must submit to EU and LRTAP emission estimations from the generating units (combustion engines on the drilling unit and the shore base) and from flaring of natural gas for the period of the drilling activities, for all the pollutants included in the LRTAP Convention, which are:

1. Main pollutants: NOx, NMVOC, SOx, NH3, CH4 and CO.
2. Particulate Matter: TSP, PM10 and PM2,5.
3. Heavy Metals: Pb, Cd, Hg, As, Cr, Cu, Ni, Se and Zn.
4. Persistent Organic Pollutants: PCDD/PCDF (dioxins/furans), PAHs (benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, indeno(1,2,3-cd)pyrene), HCB and PCBs.

4.2 The DLI may calculate the above emissions on behalf of TOTAL, provided TOTAL provides to the DLI with the following data:

* + Engine type
	+ Fuel type
	+ Fuel quantity consumed
	+ Fuel net calorific value (average)
	+ Natural Gas flared quantity
	+ Flaring of condensate quantity

It is worth noting that TOTAL will be informed on our calculations before the submission of data to EU and LRTAP Secretariat.

**5. Chemicals**

According to the basic provisions of the **Chemicals legislation** and more specifically from **European Regulations 1907/2006 (REACH Regulation) and 1272/2008 (CLP Regulation)** the following obligations are imposed:

1. **Registration**: REACH requires manufacturers and importers of chemical substances of quantities equal or higher than 1 tonne/year to register these substances to the European Chemicals Agency (ECHA). The registration is done through the submission of a registration dossier which contains information on the physicochemical, health and environmental properties of their substances that can be used to determine how these substances can be used safely.
2. **Authorisation**: Some chemicals characterised as Substances of Very High Concern are listed in Annex XIV of REACH and can not be used unless an authorisation application has been submitted to ECHA. Companies applying for authorisation will have to demonstrate that risks associated with the uses of these substances are adequately controlled or that the socio-economic benefits from their use outweigh the risks. Applicants will also have to investigate the possibility of substituting these substances with safer alternatives or technologies, and prepare substitution plans, if appropriate.
3. **Restrictions**: REACH imposes restrictions and prohibits or sets conditions for the manufacture, placing on the market or use of certain dangerous substances when unacceptable risks to humans or the environment have been identified.
4. **Communication in the supply chain**: Suppliers of substances must pass on information on the health, safety and environmental properties and safe use of their chemicals to their downstream users (via the Safety Data Sheet (SDS) proper labelling of the chemical products). For Cyprus, SDSs and labelling of chemicals should be in Greek, unless a special exemption is granted by DLI.

**6. Pressure Equipment**

The provisions of the **Essential Requirements (Pressure Equipment) Regulations of 2003 (P.I. 311/2003)** which harmonise the Pressure Equipment Directive 97/23/EC apply to new equipment to be used with a PS above 0,5 bar.

**7. Explosive Equipment**

According to the provisions of the Essential Requirements of the of the(**Equipment and Protective Systems to be Used in Explosive Atmospheres) Regulations** of 2003 (P.I. 309/2003) (ATEX Directive 94/9/EC) should be satisfied for equipment and protective systems to be used in potentially explosive atmospheres

**8. Personal Protective Equipment**

Personal Protective Equipment, Machinery and Work Equipment supplied to the workers must bear the **CE mark.**

**9. Machinery**

According to the provisions of the **Essential Requirements (Machinery) Regulations of 2003 (P.I. 428/2008)** new cranes must satisfy and bear the CE mark. In case of an import of a crane (new or used) it is advised that TOTAL shall, in advance, contact the DLI for guidance. The Department may impose preconditions on a case by case basis. All cranes are subject to periodic inspection at least once every 14 months under the provisions of article 35 of the Factories Law.

**10. Lifts**

The provisions of the **Essential Requirements (Lifts) Regulations of 2003 and 2008 (P.I. 310/2003 and P.I. 429/2008)** apply to new lifts. All lifts in operation must undergo periodic maintenance and periodic audit in accordance with the **Safety and Health at Work (Operation Maintenance and Audit of Lifts) Regulations of 2010 (P.I. 533/2010)**. the maintenance and audit of lift is done by Lift Maintenance Persons and Authorised Lift Auditors, which are approved by the DLI.

**11. Petroleum Safety**

According to the provisions of the **Petroleum legislation**  in case of LPG storage in vessels or cylinders of capacity equal to 450 liters and above, a License is required. An Application is submitted to the DLI prior to the storage with all the necessary supportive documents.

12. According to the provisions of the **Protection from Ionizing Radiation and Nuclear Safety Laws of 2002 to 2011**. The import, export, transport, storage, use etc. of radioactive sources and the related practices need to be licensed in advance. Under these laws there is also on obligation to monitor and control possible existence, production, disposal of or exposure to Naturally Occurring Radioactive Materials (NORMS). The license is granted under certain conditions by the Minister of Labour, Welfare and Social Insurance after application in writing. The Application should be submitted to the DLI (Radiation Inspection and Control Service).