

## COREXIT AVAILABILITY - UPDATE TO MEMBERS AND INDUSTRY

Dear IOGP Members / Industry Partners

This is an important update on the manufacture of the dispersant COREXIT™.

COREXIT Environmental Solutions LLC, a subsidiary of ChampionX, announced in November 2022 they would discontinue the manufacture and sale of COREXIT™ oil dispersant and shoreline cleaner products, effective immediately. In January 2023, they updated that communication to indicate that they will no longer support the regulatory framework – including product registrations or re-registration – for this product line effective July 1, 2023.

You will know from our previous communication that first step taken by IOGP, and its members was to establish a task force dedicated to resolving the issues resulting from the ChampionX announcements. You can see the previous updates to members here: Dispersants Task Force | IOGP

Since COREXIT™ Environmental Solutions LLC's announcements, IOGP and various oil spill response organizations (OSRO) have been exploring options for our members and the wider industry. It is worth noting due diligence for the purchase of the ChampionX business are continuing, with the transaction expected to close in 1Q 2025.

Although considerable time has passed since the last update, the Task Force has been actively addressing various aspects of the objectives to achieve a satisfactory resolution.

The current status of the Corexit associated dispersant issues are as follows:

- In mid-2023, the USEPA revised the chemical listing process in the USA, which means that without re-registration of the chemical by ChampionX, the Corexit product (9500A) will no longer available for use after 12<sup>th</sup> December 2025.
- All US OSROs are in process of replacing existing dispersant inventories to meet US EPA regulations since existing US dispersant inventories cannot be used in the US after December 11, 2025. This includes not being able to use existing global dispersant inventories, unless those chemicals are re-listed.
- The new listing process now also mandates that stockpiles be stored in compliance with manufacturer's requirements and be subject to verification.
- ChampionX have confirmed that they will not be re-listing Corexit products in the USA.
- However, ChampionX have re-registered Corexit 9500A in the United Kingdom and Brazil
  in 2024. The UK registration is valid for 5 years, while the Brazil registration is valid for 2
  years. They are also considering re-registrations in France. It is important to note, though,
  that any Corexit stockpiled outside of the USA cannot be used in the event of a largescale incident requiring additional dispersant beyond what is already available in the
  USA.
- At the time of writing, there are currently three (3) chemicals listed under the new listing protocols in the USA able to be used as dispersants after the 12<sup>th</sup> of December 2025;
  - Dasic Ecosafe OSD
  - o ACCELL Clean DWD 2.0
  - o Finasol OSR 52 IBC
- Additionally, the dispersant Finasol OSR 52 (note: different to OSR 52 IBC) has been reregistered in Brazil following the expiration of its registration in May 2024, and the

- manufacturer is working on re-listing it in the USA. This is the primary dispersant stockpiled outside the USA by Oil Spill Response Limited (OSRL).
- The Dasic Ecosafe OSD dispersant formulation allows Corexit 9500A to be used as a key feedstock in the production of Ecosafe OSD, potentially reducing manufacturing costs. This option is available for OSROs looking to recycle otherwise unusable stockpiles.
- Each OSRO will determine whether to use this route for recycling or buy a new dispersant and dispose of the COREXIT 9500A stockpiles.
- OSRL can continue using Corexit 9500 in most regions outside the USA as per the reregistrations outlined above, however, the extent of its use will be determined by the French registration. Several countries rely on registrations from the UK, France or the USA, or a combination of two of the three, as a basis for accepting dispersant deployment within their own borders.
- One of the issues associated with replacing Corexit stockpiles to meet USA listing requirements is the disposal of the current stockpiles. Disposal would be a costly process, and given the substantial investment, amounting to tens of millions of dollars spent purchasing these chemicals, disposal represents a costly undertaking. We therefore believe that disposal should be considered only as a last resort with recycling or re-use being fully evaluated as part of the restocking decision.

From the outset, IOGP has made it clear that the association does not advocate for one dispersant over another. As IOGP is neither a member of any OSRO, nor are any OSROs members of IOGP, the Task Force has provided information to the extent possible regarding decisions and outcomes concerning replacement stockpiles and the management of current stockpiles within those organisations. We firmly believe that decisions regarding which dispersant to stockpile should not be based solely on cost. Rather, these decisions must carefully balance environmental toxicity, effectiveness, likelihood of approval by regulators and cost. This approach ensures that dispersant use during spill response minimizes environmental harm, while also controlling costs, ultimately reducing the overall financial impact of deployment. Furthermore, the potential for reusing stockpiled COREXT9500A should be fully evaluated as part of a comprehensive cost and risk management strategy.

We encourage our Members to engage with any USA OSROs they are affiliated with in order to gain a deeper understanding of the considerations being applied by those OSROs in evaluating stockpile replacement options, ensuring that the most informed long-term decisions are made.

Given the current circumstances, it is anticipated that the Task Force will conclude by the end of 1Q 2025 given that IOGP's role may only marginally inform the outcome at this stage.

We will provide a further update at that stage including the progress against all the objectives from the Task Force Terms of Reference.

Should you have any queries or questions regarding this matter, please do not hesitate to contact me.

Kind regards,

Harvey Johnstone **Environment Director** 

**IOGP**