

Decision making by NOPSEMA

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Assessment & Inspection – Seismic & Production



Regulatory Management System (RMS)

- Custom-designed, web-based database
- Storage of all regulatory activity data
- A systematic and functional tool to assist staff
 - Steps through procedures
 - Creates documents
 - Tracks timeframes
 - Indicates workload

Prescribed
process
and
outcome

Prescribed
minimum
standard



PRESCRIBED PROCESS AND OUTCOME

Assess
Inspect
Enforce
Investigate
Advise
Promote

Consult
Identify
Evaluate
Treat
Improve
Monitor



Consistent \neq Identical

EP expectations of NOPSEMA?

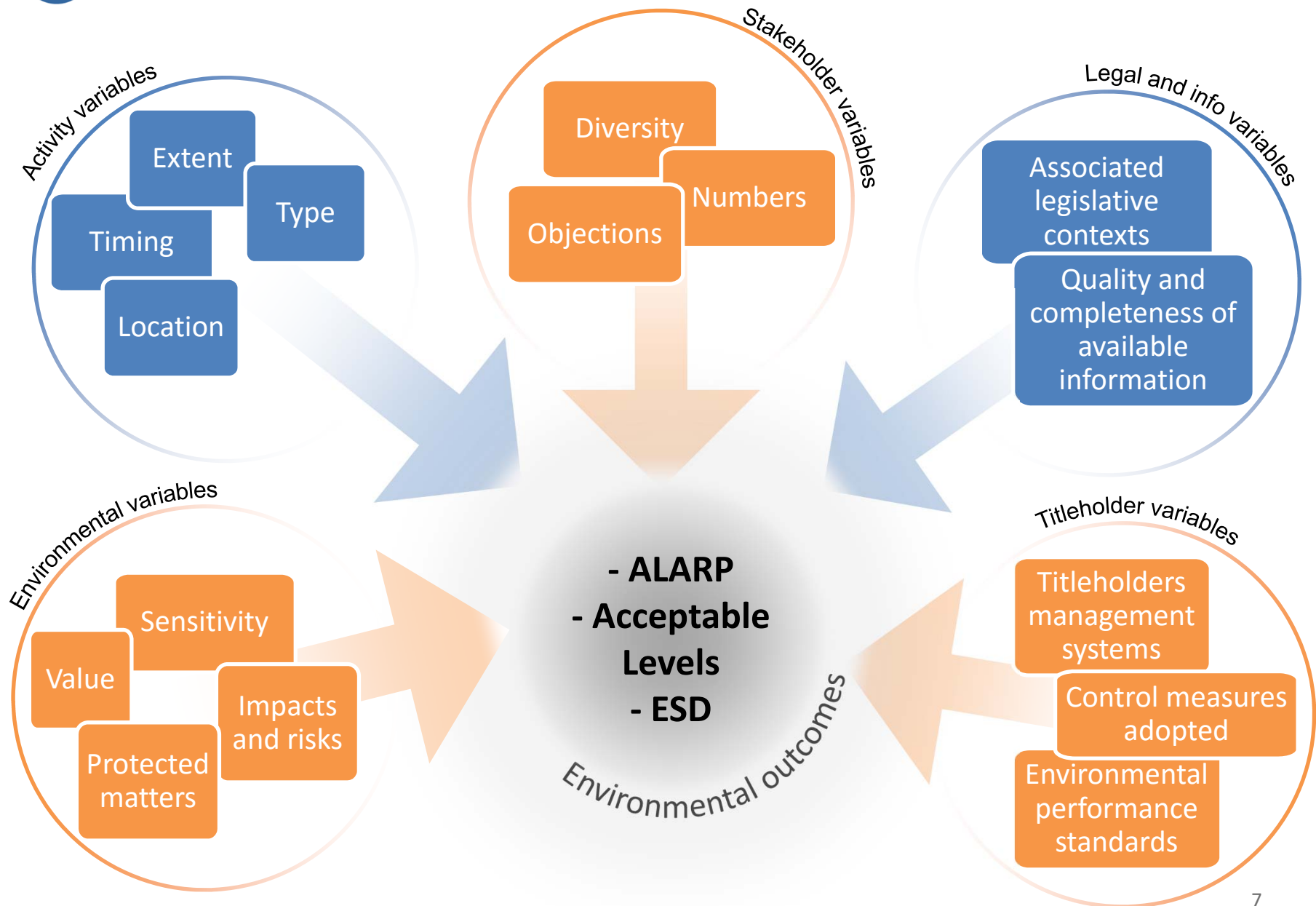
Consistent

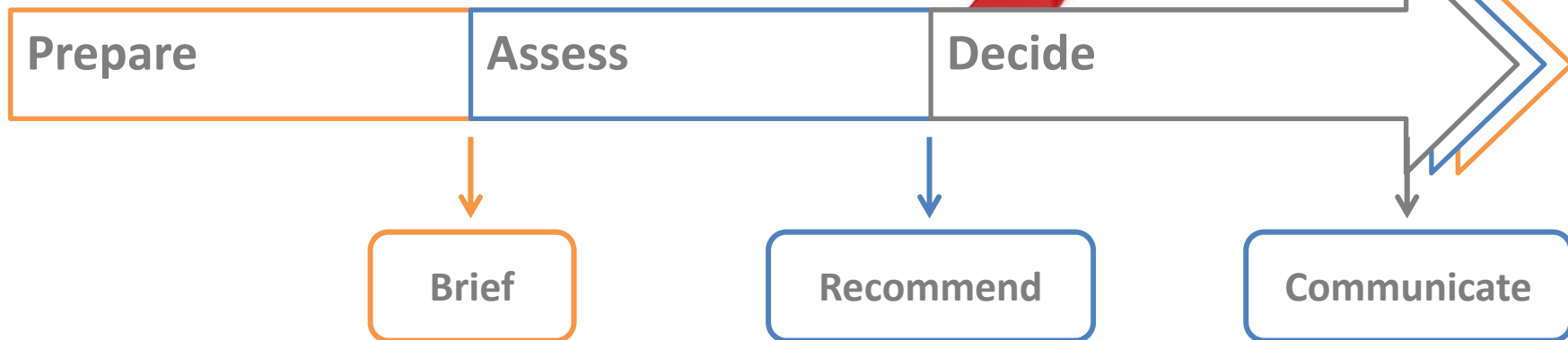
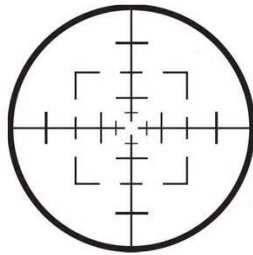
Acting or done in the same way over time, especially so as to be fair or accurate.

≠

Identical

Similar in every detail; exactly alike.



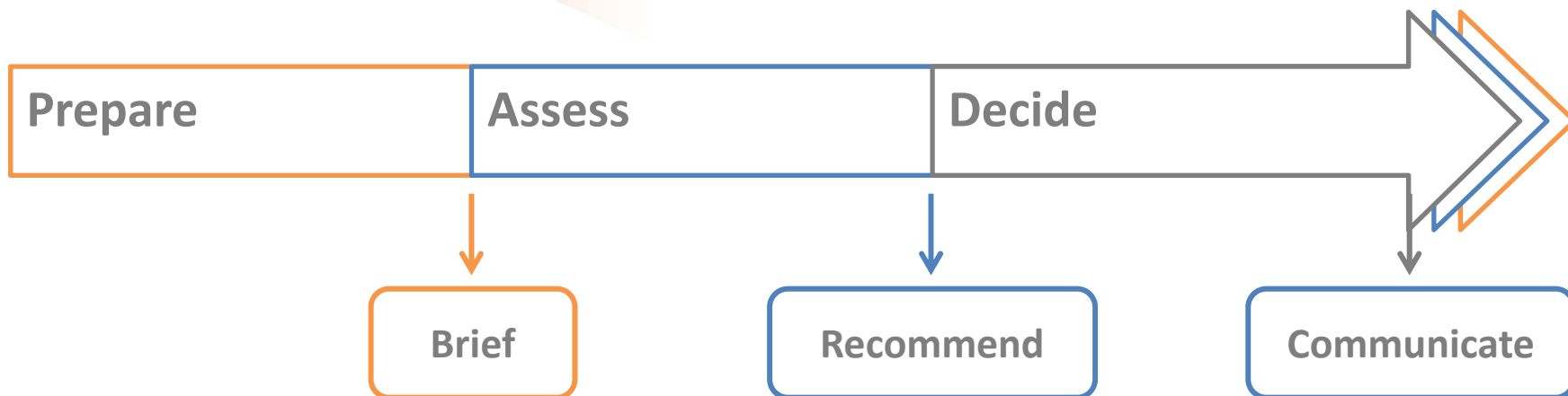


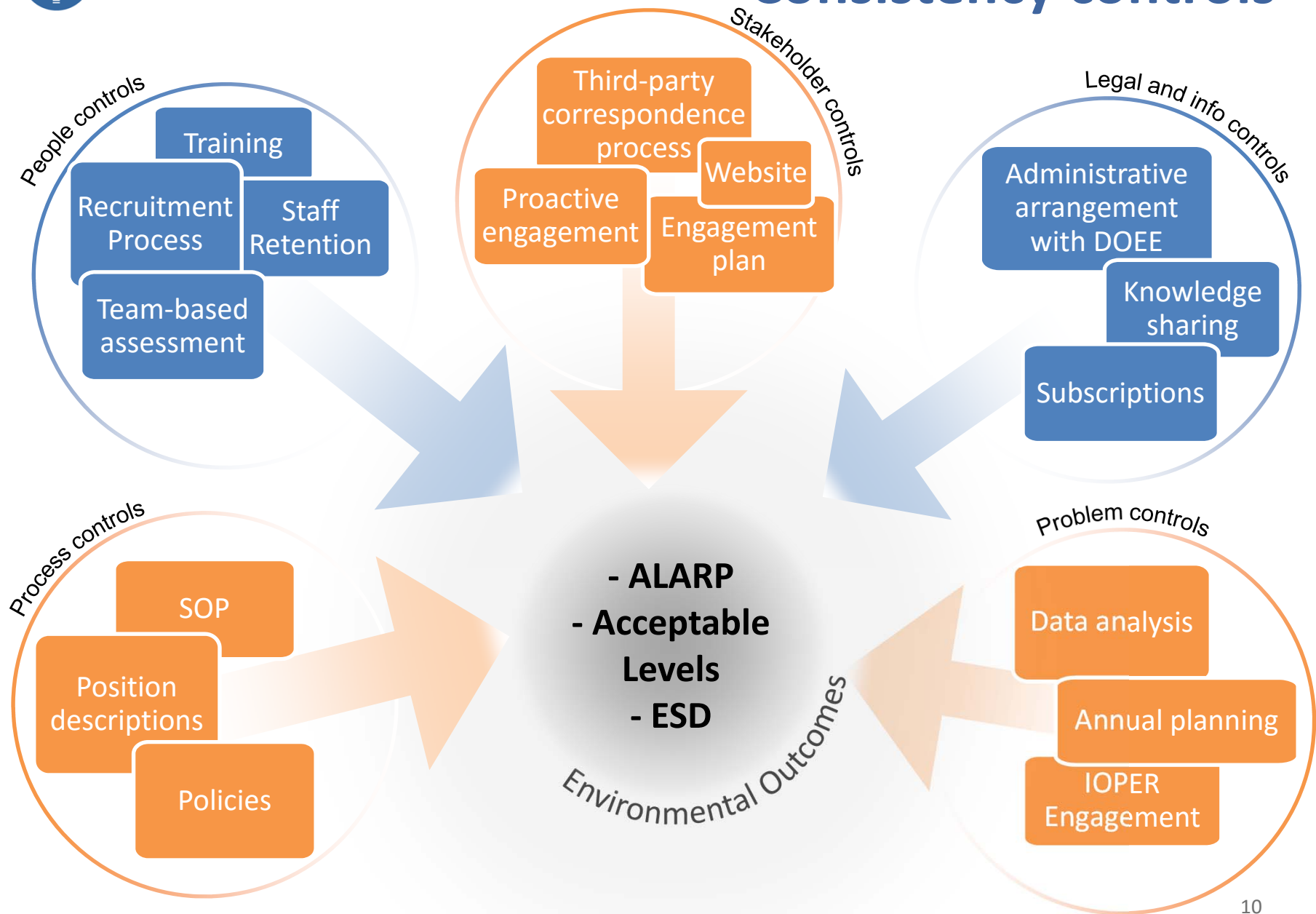


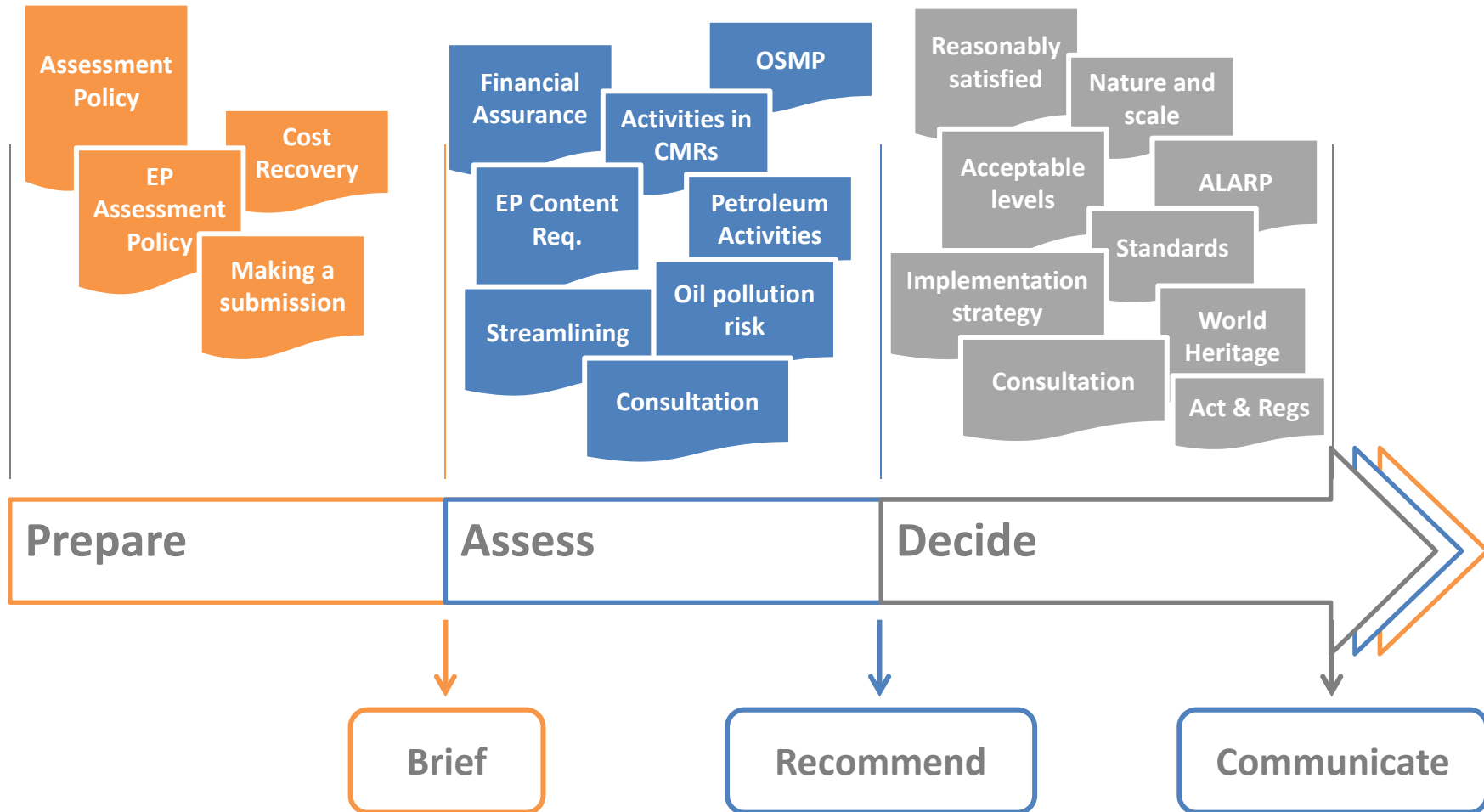
Assessment
Policy

EP
Assessment
Policy

- Publication of certain details
- Regard for all relevant information (not just the EP)
- Team-based assessment
- General assessment plus topic assessment
- Unconditional decisions
- Timely decisions (statutory timeframes)







Introduction to RMS





New Petroleum Activity

Basic Info

Save

Basic Details

Name * <input type="text"/>	Titleholder(s) * <input type="text"/>
Type * <input type="text"/>	Sub-types <input type="text"/>
Team * <input type="text"/>	Focal Point Inspector <input type="text"/>
Jurisdictions * <input type="text"/>	Nearest State(s) * <input type="text"/>

Associated Offshore Project Proposal and EPBC Approval

This section is required in order to submit an Environment Plan for this activity

Is this activity part of an Offshore Project?

Important Dates

[Add start/end of activity dates](#)

New Assessment

Basic Info

Save

Basic Information

Assessment Type * <input type="text"/>	Description <input type="text"/>
Assessment Subtype <input type="text"/>	
Jurisdictions * <input type="text"/>	
Submission Received <input type="text"/>	

Organisation and Facilities/Activities etc

Submitted By *

Facilities/Activities etc. *
 Not Applicable

Team

Assessment Team *

Lead Assessor

[Add Additional Assessor](#)

Links

[Add Link](#)



RMS Assessment ▾ Inspection ▾ Major Investigation ▾ Notification ▾ Enforcement ▾ Registers ▾ Lists ▾ Reporting ▾

Gorgon and Jansz Feed Gas Pipeline and Wells Operations Environment Plan - Petroleum Activity

Chevron Australia Pty Ltd - correct at 10/02/2015

Basic Info Contact Details Nominated Liaison Timeline Issues

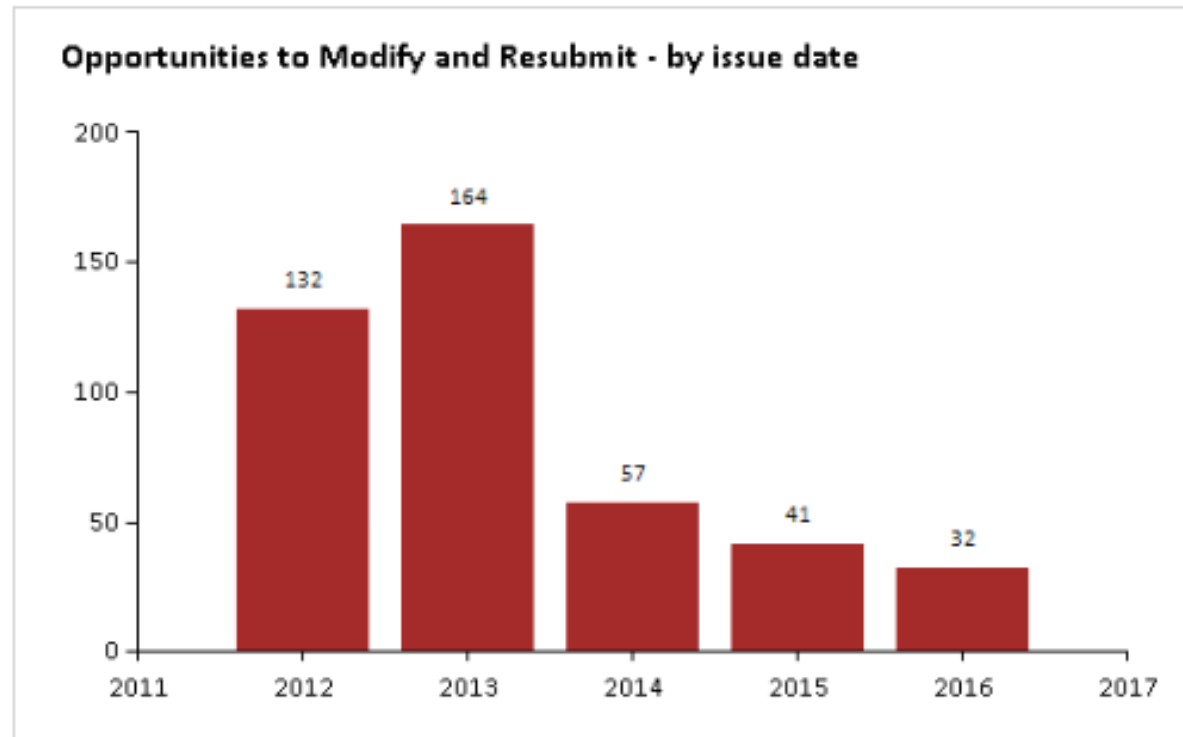
▶ Save

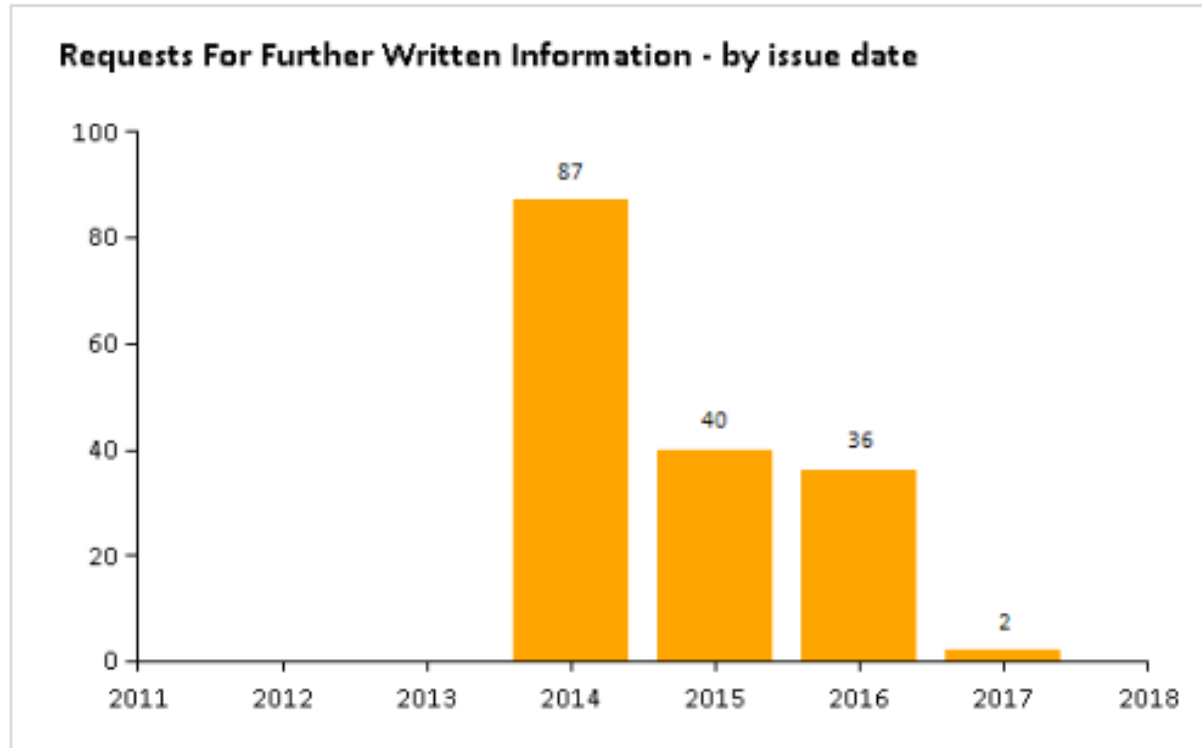
^ Basic Details

<p>Name * Gorgon and Jansz Feed Gas Pipeline and Wells Operations En</p> <p>Type * Operation of a petroleum pipeline x ▾</p> <p>Team * Environment - A+1 SP x ▾</p> <p>Jurisdictions * x Commonwealth</p>	<p>Titleholder(s) * Chevron Australia Pty Ltd ▾</p> <p>Sub-types Choose sub-types</p> <p>Focal Point Inspector Choose an Inspector ▾</p> <p>Nearest State(s) * x WA</p>
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^ Environment Plan

Latest Environment Plan Assessment	5 Year Revision Due Date	In Force?	Reference File Number
Assessment 3507	15/08/2021	Yes	R013587







Median assessment timeframes (2012-2016)

All activity types

82

days

Min 3 days - Max 1124 days

52

days with NOPSEMA

28

days with titleholder

* Based on 334 environment plan assessments



Median assessment timeframes (2016)

All activity types



Min 29 days - Max 153 days

43

days with NOPSEMA

21

days with titleholder

* Based on 15 environment plan assessments



EP assessments (2014-2016)

SUBMITTED	NOTIFIED
151	158
NEW EPS	116
REVISED EPS	35
# COMPLETED (% ACCEPTED)	128 (98%)
# IN PROGRESS	10
# RECALLED/RETURNED	13
EP SUMMARIES	24
# NOT NOTIFIED IN TIME	0 (0%)
# DECISIONS MADE - Accepted	170 (98%)
- Refused	3 (2%)
AVERAGE DAYS TO FIRST NOTIFICATION	26.0
AVERAGE DAYS TO COMPLETION	111.7
Construction	64.7
Decommissioning	74.7
Drilling	147.1
Operations	123.1
Other	56.2
Seismic	106.1

EP assessments (2016)

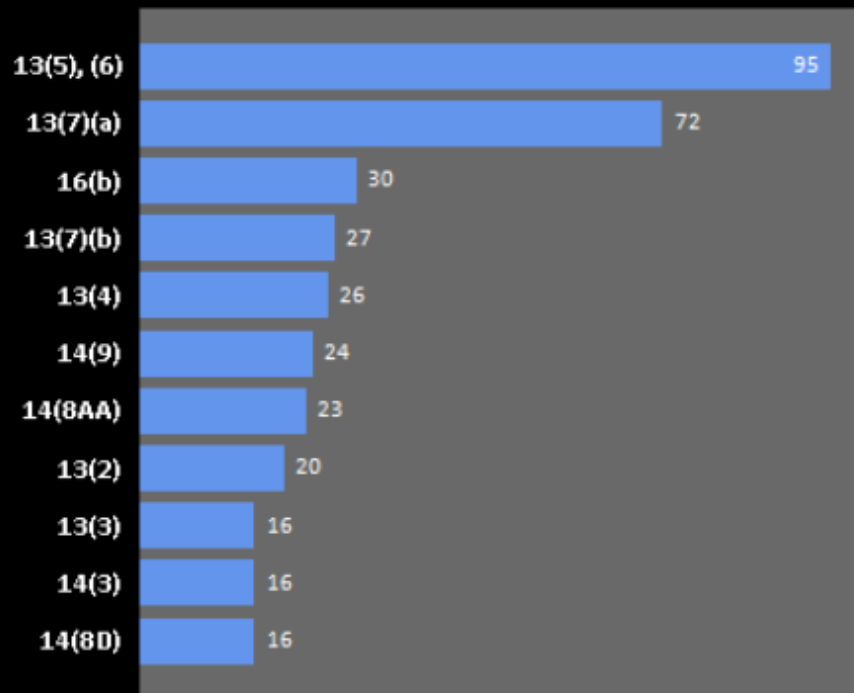
SUBMITTED	NOTIFIED
32	33
NEW EPS	21
REVISED EPS	11
# COMPLETED (% ACCEPTED)	20 (100%)
# IN PROGRESS	9
# RECALLED/RETURNED	3
EP SUMMARIES	24
# NOT NOTIFIED IN TIME	0 (0%)
# DECISIONS MADE - Accepted	31 (97%)
- Refused	1 (3%)
AVERAGE DAYS TO FIRST NOTIFICATION	27.0
AVERAGE DAYS TO COMPLETION	113.8
Construction	
Decommissioning	47.0
Drilling	70.0
Operations	151.0
Other	29.0
Seismic	111.6



EP assessments (2014-2016)

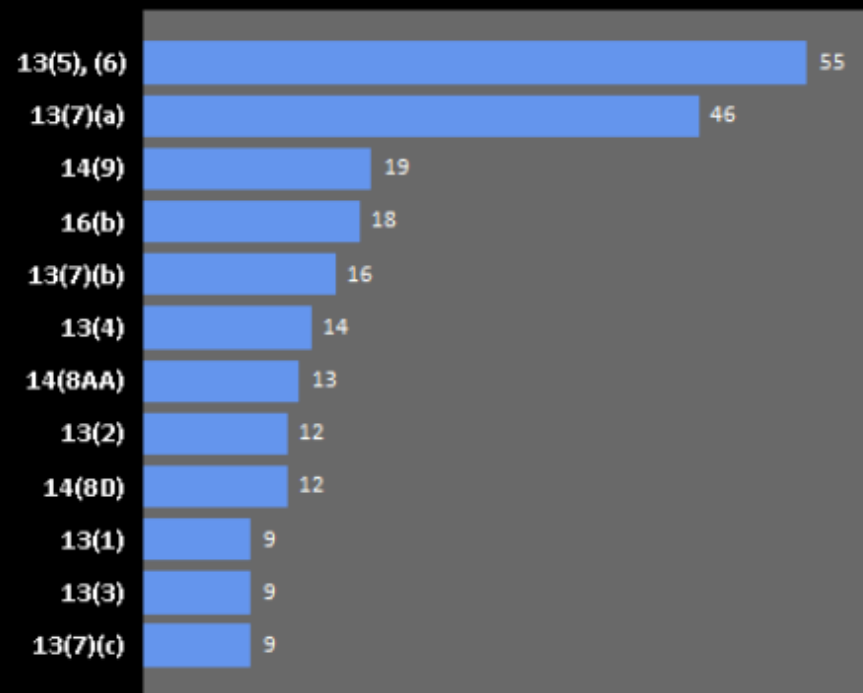
EP assessments (2016)

Top (10) regulations not in compliance



Note: Does not include environment plans submitted prior to 28th February 2014

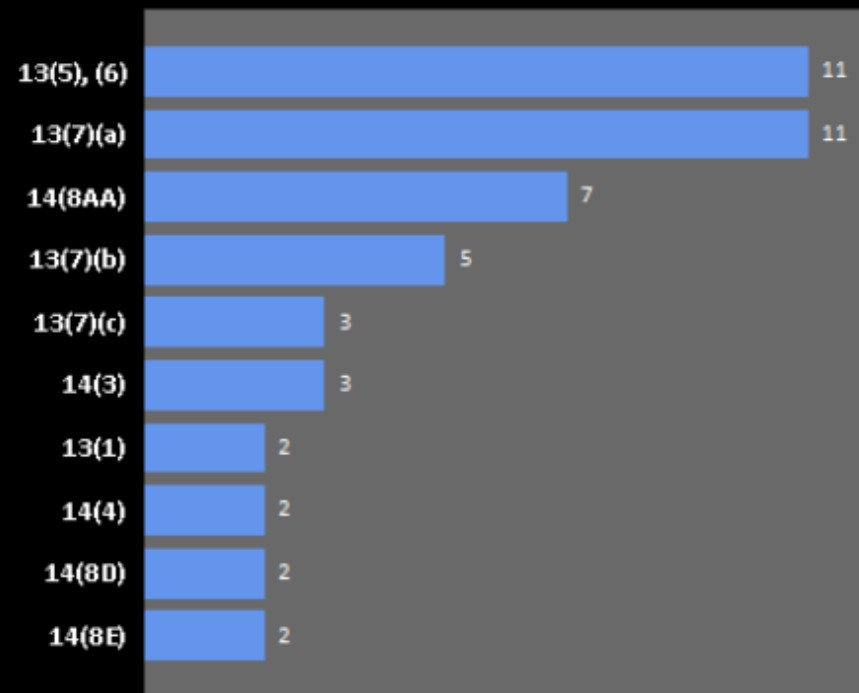
Top (10) regulations not in compliance



Note: Does not include environment plans submitted prior to 28th February 2014


SUBMITTED
26
NOTIFIED
27

NEW EPS	18
REVISED EPS	8
# COMPLETED (% ACCEPTED)	22 (100%)
# IN PROGRESS	3
# RECALLED/RETURNED	1
EP SUMMARIES	4
# NOT NOTIFIED IN TIME	0 (0%)
# DECISIONS MADE - Accepted	29 (100%)
- Refused	0 (0%)
AVERAGE DAYS TO FIRST NOTIFICATION	25.6
AVERAGE DAYS TO COMPLETION	74.9
Construction	
Decommissioning	47.0
Drilling	64.4
Operations	129.4
Other	44.8
Seismic	65.5

Top (10) regulations not in compliance


Note: Does not include environment plans submitted prior to 28th February 2014

Environment plan content post-amendments



- Reduced community confidence and legal challenge from:
 - Misrepresented/misinterpreted content
 - Unreliable and weak arguments
 - Inaccurate content (facts and alternative facts!!)
 - Contradictory content
 - Stakeholders overwhelmed with content
- These risks exist now



For NOPSEMA

For titleholders

Provide clear guidance (DMGs)	Misrepresented content	Clear and concise EPs
Early return of substandard EPs	Weak arguments	Logical, comprehensive and balanced arguments
Expert teams making decisions	Inaccurate content	Record considerations of most appropriate science and studies
Reliance on assessment process	Contradictory content	Reliance on review and authorisation processes
Reference case for EP content	Stakeholder fatigue	Reference case for EP content



- Common content could be replaced
 - Many descriptions of some environments/receptors
 - Logical and factual ALARP arguments for common impacts and risks
 - Defined environmental performance outcomes
 - Common control measures and performance standards
- NOPSEMA actions
 - Approaching titleholders who excel for material
 - Producing templates and review material
 - Facilitate suitable publication form and forum

Any questions?

