Decision making by NOPSEMA

Matt Smith
Environment Manager
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  Consult
Inspect  Identify
Enforce  Evaluate
Investigate  Treat
Advise  Improve
Promote  Monitor
Consistent ≠ Identical
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.
Consistency of process

- 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)

Prepare → Assess → Decide

- Brief
- Recommend
- Communicate
Advice on process

Prepare
- Brief

Assess
- Financial Assurance
- Activities in CMRs
- Petroleum Activities
- Streamlining
- EP Content Req.
- Consultation

Decide
- Reasonably satisfied
- Nature and scale
- Acceptable levels
- ALARP
- Implementation strategy
- Consultation
- World Heritage
- Act & Regs

Cost Recovery
- EP Assessment Policy
- Making a submission

Assessment Policy
- OSMP
- Policy
- EP Assessment Policy
- Petroleum Activities Streamlining
- Oil pollution risk
- Consultation
- Nature and scale
- Acceptable levels
- ALARP
- Implementation strategy
- World Heritage
- Act & Regs
Introduction to RMS
**Gorgon and Jansz Feed Gas Pipeline and Wells Operations Environment Plan - Petroleum Activity**

**Name:** Gorgon and Jansz Feed Gas Pipeline and Wells Operations, Qld

**Type:** Operation of a petroleum pipeline

**Tunnel:** Environment – A & S P

**Jurisdiction:** Commonwealth

### Environment Plan

<table>
<thead>
<tr>
<th>Latest Environment Plan Assessment</th>
<th>5 Year Renewal Date</th>
<th>Is Fossa?</th>
<th>Reference File Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assessment 3667</td>
<td>15/06/2021</td>
<td>Yes</td>
<td>8012455F</td>
</tr>
</tbody>
</table>
Data analysis

Opportunities to Modify and Resubmit - by issue date

- 2011: 132
- 2012: 164
- 2013: 57
- 2014: 41
- 2015: 32
Requests For Further Written Information - by issue date

- 2011: 0
- 2012: 0
- 2013: 0
- 2014: 87
- 2015: 40
- 2016: 36
- 2017: 2
- 2018: 0
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
Data analysis

Median assessment timeframes (2016)

All activity types

63 days
Min 29 days - Max 153 days

43 days with NOPSEMA
21 days with titleholder

* Based on 15 environment plan assessments
### EP assessments (2014-2016)

<table>
<thead>
<tr>
<th></th>
<th>Submitted</th>
<th>Notified</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>NEW EPS</strong></td>
<td>151</td>
<td>158</td>
</tr>
<tr>
<td><strong>REVISED EPS</strong></td>
<td>35</td>
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<tr>
<td># COMPLETED (% ACCEPTED)</td>
<td>128 (98%)</td>
<td></td>
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<tr>
<td># IN PROGRESS</td>
<td>10</td>
<td></td>
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<tr>
<td># RECALLED/RETURNED</td>
<td>13</td>
<td></td>
</tr>
<tr>
<td><strong>EP SUMMARIES</strong></td>
<td>24</td>
<td></td>
</tr>
<tr>
<td># NOT NOTIFIED IN TIME</td>
<td>0 (0%)</td>
<td></td>
</tr>
<tr>
<td># DECISIONS MADE - Accepted</td>
<td>170 (98%)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Refused</td>
<td>3 (2%)</td>
</tr>
<tr>
<td><strong>AVERAGE DAYS TO FIRST NOTIFICATION</strong></td>
<td>26.0</td>
<td></td>
</tr>
<tr>
<td><strong>AVERAGE DAYS TO COMPLETION</strong></td>
<td>111.7</td>
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<tr>
<td>Construction</td>
<td>64.7</td>
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<tr>
<td>Decommissioning</td>
<td>74.7</td>
<td></td>
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<tr>
<td>Drilling</td>
<td>147.1</td>
<td></td>
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<tr>
<td>Operations</td>
<td>123.1</td>
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<tr>
<td>Other</td>
<td>56.2</td>
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<tr>
<td>Seismic</td>
<td>106.1</td>
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### EP assessments (2016)

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<thead>
<tr>
<th></th>
<th>Submitted</th>
<th>Notified</th>
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<tbody>
<tr>
<td><strong>NEW EPS</strong></td>
<td>32</td>
<td>33</td>
</tr>
<tr>
<td><strong>REVISED EPS</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td># COMPLETED (% ACCEPTED)</td>
<td>20 (100%)</td>
<td></td>
</tr>
<tr>
<td># IN PROGRESS</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td># RECALLED/RETURNED</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td><strong>EP SUMMARIES</strong></td>
<td>24</td>
<td></td>
</tr>
<tr>
<td># NOT NOTIFIED IN TIME</td>
<td>0 (0%)</td>
<td></td>
</tr>
<tr>
<td># DECISIONS MADE - Accepted</td>
<td>31 (97%)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Refused</td>
<td>1 (3%)</td>
</tr>
<tr>
<td><strong>AVERAGE DAYS TO FIRST NOTIFICATION</strong></td>
<td>27.0</td>
<td></td>
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<tr>
<td><strong>AVERAGE DAYS TO COMPLETION</strong></td>
<td>113.8</td>
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<tr>
<td>Construction</td>
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<tr>
<td>Decommissioning</td>
<td>47.0</td>
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</tr>
<tr>
<td>Drilling</td>
<td>70.0</td>
<td></td>
</tr>
<tr>
<td>Operations</td>
<td>151.0</td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>29.0</td>
<td></td>
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<tr>
<td>Seismic</td>
<td>111.6</td>
<td></td>
</tr>
</tbody>
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EP assessments (2014-2016)

Top 10 regulations not in compliance

1. 13(5), (6) - 95
2. 13(7)(a) - 72
3. 16(b) - 30
4. 13(7)(b) - 27
5. 13(4) - 26
6. 14(9) - 24
7. 14(8AA) - 23
8. 13(2) - 20
9. 13(3) - 16
10. 14(3) - 16

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

EP assessments (2016)

Top 10 regulations not in compliance

1. 13(5), (6) - 55
2. 13(7)(a) - 46
3. 14(9) - 19
4. 16(b) - 18
5. 13(7)(b) - 16
6. 13(4) - 14
7. 14(8AA) - 13
8. 13(2) - 12
9. 14(8D) - 12
10. 13(1) - 9
11. 13(3) - 9
12. 13(7)(c) - 9

Note: Does not include environment plans submitted prior to 28th February 2014
<table>
<thead>
<tr>
<th>SUBMITTED</th>
<th>NOTIFIED</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>26</strong></td>
<td><strong>27</strong></td>
</tr>
</tbody>
</table>

- **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

Top (10) regulations not in compliance:

- 13(5), (6): 11
- 13(7)(a): 11
- 14(8AA): 7
- 13(7)(b): 5
- 13(7)(c): 3
- 14(3): 3
- 13(1): 2
- 14(4): 2
- 14(8D): 2
- 14(8E): 2

*Note: Does not include environment plans submitted prior to 28th February 2014*
Environment plan content post-amendments
Risks to decisions

• 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
<table>
<thead>
<tr>
<th>For NOPSEMA</th>
<th>For titleholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provide clear guidance (DMGs)</td>
<td>Misrepresented content</td>
</tr>
<tr>
<td></td>
<td>Clear and concise EPs</td>
</tr>
<tr>
<td>Early return of substandard EPs</td>
<td>Weak arguments</td>
</tr>
<tr>
<td></td>
<td>Logical, comprehensive and balanced arguments</td>
</tr>
<tr>
<td>Expert teams making decisions</td>
<td>Inaccurate content</td>
</tr>
<tr>
<td></td>
<td>Record considerations of most appropriate science and studies</td>
</tr>
<tr>
<td>Reliance on assessment process</td>
<td>Contradictory content</td>
</tr>
<tr>
<td></td>
<td>Reliance on review and authorisation processes</td>
</tr>
<tr>
<td>Reference case for EP content</td>
<td>Stakeholder fatigue</td>
</tr>
<tr>
<td></td>
<td>Reference case for EP content</td>
</tr>
</tbody>
</table>

**Date**
• 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?