

OSCP Preparation Guidance Feedback Workshop

Spill Assessment Team

Matt Smith

Camille Boxall

Rhys Jones

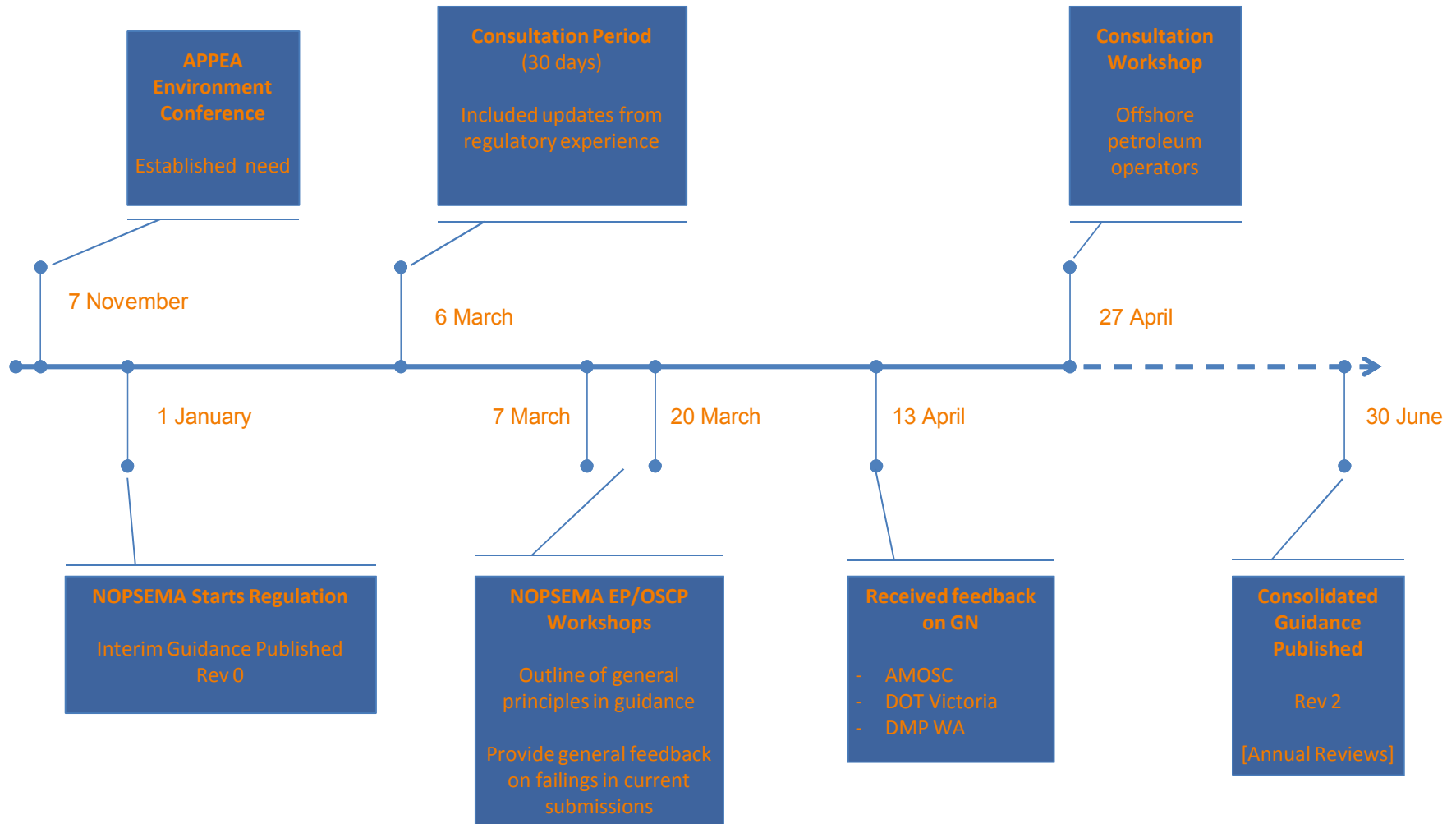
Zoe Jones

- Safety induction
- Refreshments provided; breaks as required
- Format; focused discussion
- Unanswered questions will be taken on notice

- **Purpose**
 - To provide an opportunity to offshore petroleum operators to give constructive feedback to the regulator in relation to areas of improvement in the Oil Spill Contingency Plan Preparation Guidance Note.
- **Objectives**
 - To improve the guidance note through operator feedback
 - To understand operators concerns in preparing OSCP
 - Consider priorities and scope for any of further guidance
- **Assumptions**
 - NOPSEMA material previously presented is taken as read
 - NOPSEMA general information is understood

- Independent and professional regulator
- Principles of regulatory guidance
 - Legislated function to provide advice
 - Must not create pseudo regulation
 - Provided to industry to consider possible approaches

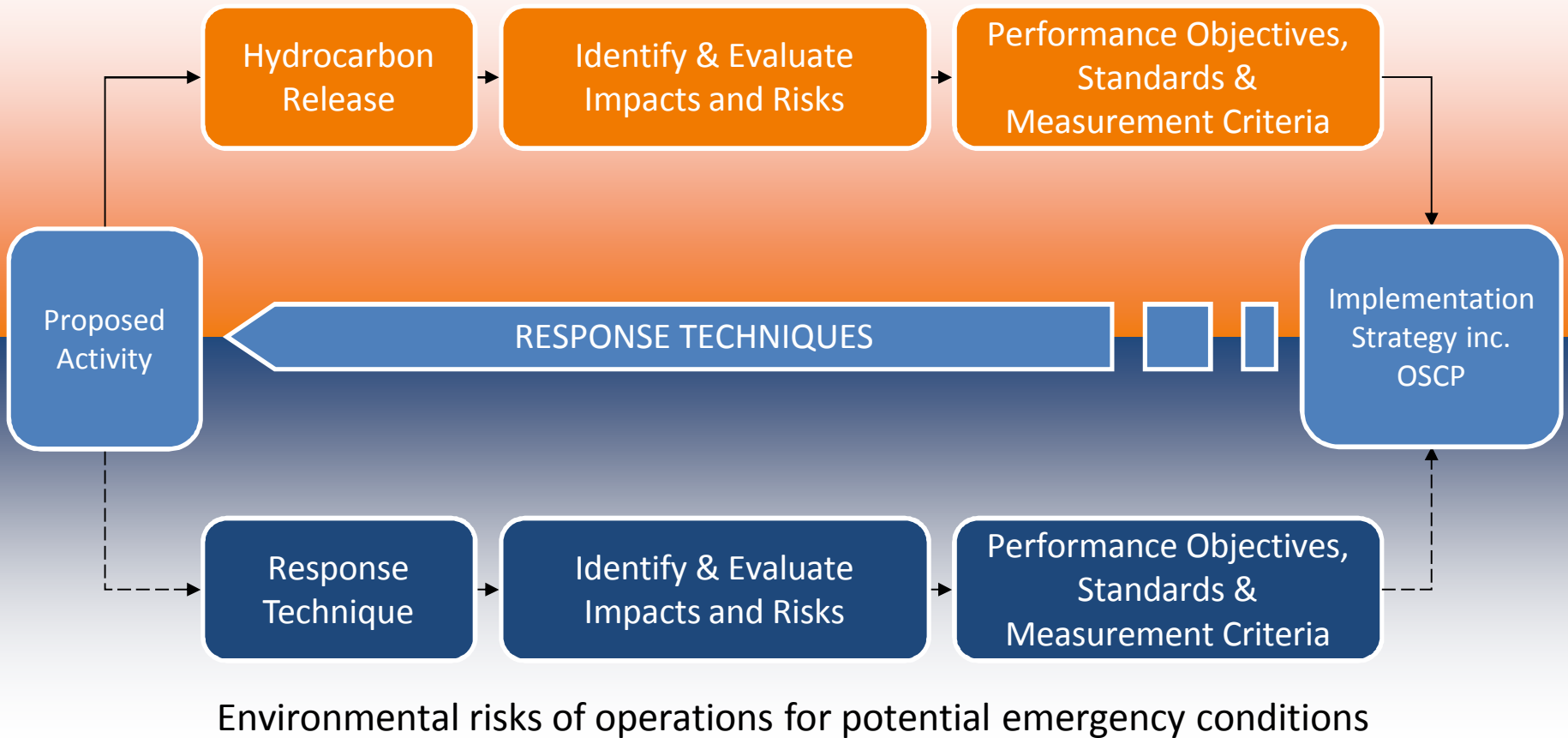
- **Goal**
 - To ensure industry, government and the regulator are prepared and ready to response to significant oil spill incidents from offshore petroleum activities.
- **Activities**
 - Timely and efficient assessment
 - Comprehensive and thorough inspection
 - Robust systems and processes
 - Informed and supportive stakeholders
 - Appropriate response readiness



- Comments and feedback should;
 - Be unrelated to specific situations
 - Focus on application/interpretation of the regulations
 - Clearly describe issue and have a specific question

- OSCP Approach
- Oil spill modelling
- Net Environmental Benefit Assessment (NEBA)
- Definitions and terminology
- The National Plan
- Acceptability criteria
- Industry Challenge: Operational Plan vs Stating Your Case
- OSCP vs Incident Action Plan
- Government Response
- Response Techniques

Environmental risks of operations



- No regulatory requirement for modelling
- Possible assistance...
 - in describing your environment (zone of potential impact)
 - in describing your impacts and risks (resources at risk)
 - *in providing focus locations for response techniques*
 - *in identifying equipment stockpile locations*
 - *in providing incident specific information*
 - *in identifying monitoring sites*

- NEBA is not a regulatory term
- Possible assistance...
 - in evaluating impacts and risks
 - demonstrating ALARP (natural recovery?)
 - deciding on (response) activities included in a submission
 - supporting information for the implementation strategy
 - *support achieving a stated objective*
 - *confirm or amend the priorities for protection*

- For the operator to define and justify...
 - ...reasonable...
 - ...significant...
 - ...appropriate...
 - ...relevant...
 - ...sufficient...
 - ...practicable...
 - ...credible...
- For the regulator to assess...
 - ...reasonable.

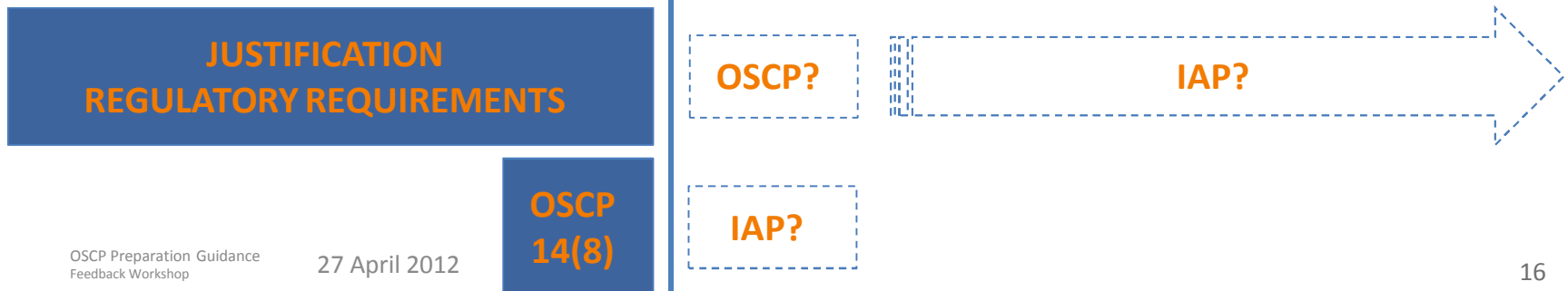
- Is not legislation
- Implements the intent of the OPRC
- NOPSEMA is the Statutory Agency
- ‘Handover/takeover’ of responsibility concept inadequate for application to the OPGGSA
- Operator always retains combat responsibility
- Dispersant approvals are gained from an accepted EP and OSCP

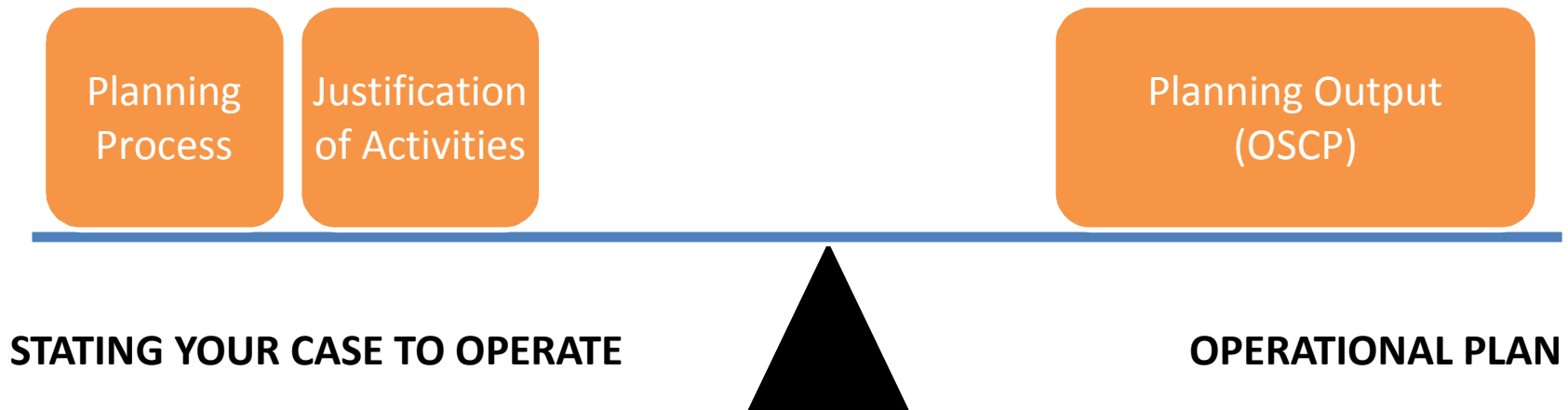
- **Regulation 11**
 - Nature & Scale
 - ALARP
 - Acceptable
 - Performance Obj, Stnds, Measurement Criteria
 - Implementation Strategy
 - Stakeholder Consultation
 - Complies with the Act and the Regulations

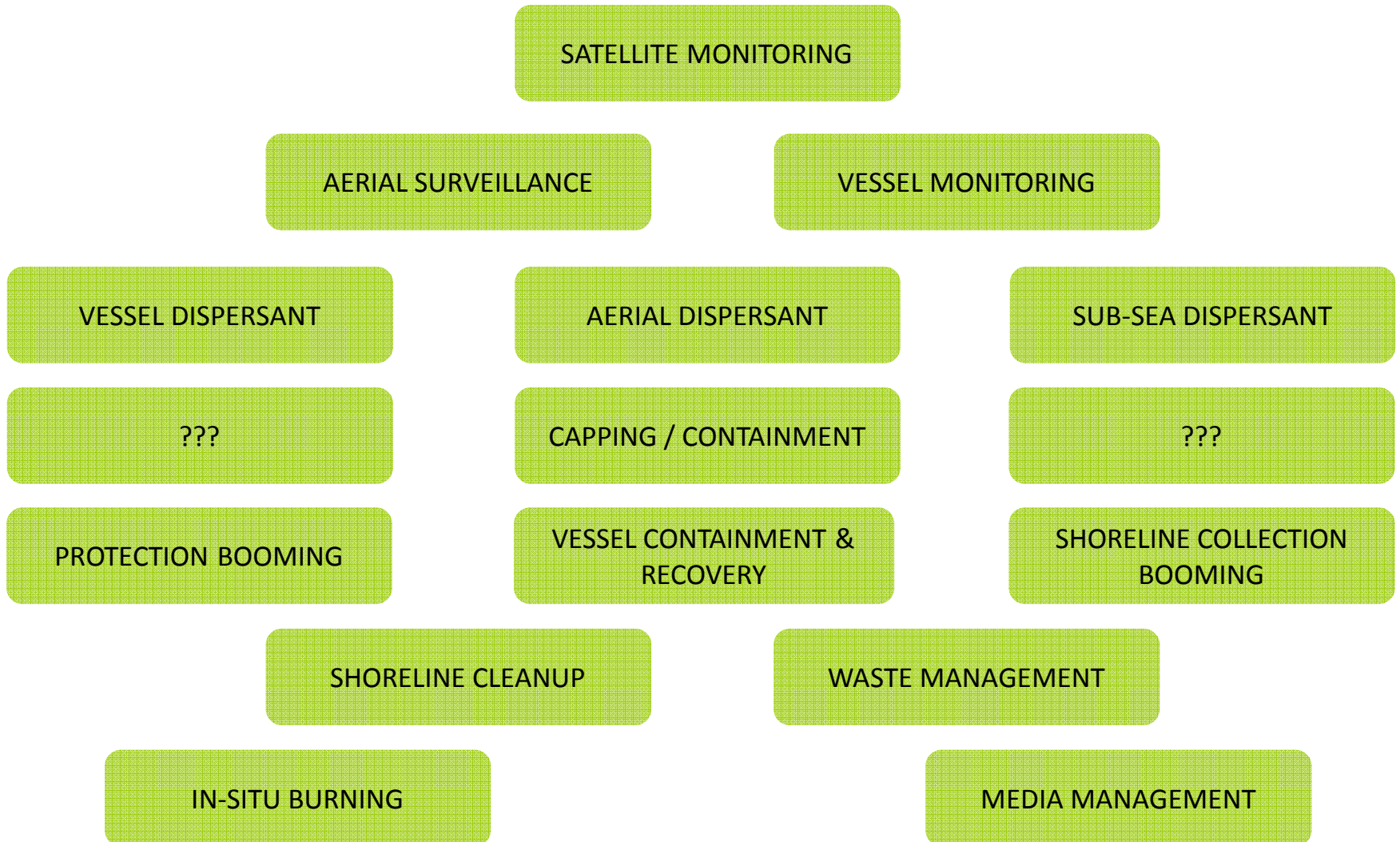
- **Performance Objectives**
 - What do you want to achieve?
 - Response outcome focus?
 - Environmental outcome focus?
- **Performance Standards**
 - How are you going to achieve it?
 - Detail your minimum standard?
 - Timing/resources/technique mobilisation?
- **Measurement Criteria**
 - How do you measure when it has been achieved?
 - Auditable record of achievement?
 - Monitor efficacy of response techniques?
 - Termination criteria?

- How do you want to manage the risk?
 - Management systems differ
 - Perception of risk differ
 - Locations differ
 - Mitigation measures differ
 - Specifics of operations differ

INCIDENT
OCCURS







Any Questions?