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 OSCPs
  - Consider priorities and scope for any of further guidance

• **Assumptions**
  - NOPSEMA material previously presented is taken as read
  - NOPSEMA general information is understood
Context

- 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
Spill Assessment Team

• **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
OSCP Preparation GN
Consultation Timeline

- APPEA Environment Conference
  - Established need
  - 7 November

- NOPSEMA Starts Regulation
  - Interim Guidance Published
    - Rev 0
  - 1 January

- NOPSEMA EP/OSCP Workshops
  - Outline of general principles in guidance
  - Provide general feedback on failings in current submissions
  - 7 March

- Consultation Period
  - (30 days)
  - Included updates from regulatory experience
  - 6 March

- Consultation Workshop
  - Offshore petroleum operators
  - 20 March

- NOPSEMA EP/OSCP Workshops
  - 27 April

- Received feedback on GN
  - AMOSC
  - DOT Victoria
  - DMP WA
  - 13 April

- Consolidated Guidance Published
  - Rev 2
  - 30 June

[Annual Reviews]
Workshop Rules

• Comments and feedback should:
  – Be unrelated to specific situations
  – Focus on application/interpretation of the regulations
  – Clearly describe issue and have a specific question
Topic Areas

- 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 for potential emergency conditions

- Hydrocarbon Release
- Identify & Evaluate Impacts and Risks
- Performance Objectives, Standards & Measurement Criteria

Response Techniques

- Proposed Activity
- Implementation Strategy inc. OSCP

Performance Objectives, Standards & Measurement Criteria
• 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
Acceptability Criteria

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

- 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

OSCP?  IAP?

OSCP 14(8)

JUSTIFICATION
REGULATORY REQUIREMENTS

OSCP vs IAP
Industry Challenge: Balance

Planning Process

Justification of Activities

Planning Output (OSCP)

STATING YOUR CASE TO OPERATE

OPERATIONAL PLAN
Response Techniques

- SATELLITE MONITORING
  - AERIAL SURVEILLANCE
  - VESSEL MONITORING
  - VESSEL DISPERSANT
    - AERIAL DISPERSANT
      - CAPPING / CONTAINMENT
    - SUB-SEA DISPERSANT
    - ???
  - PROTECTION BOOMING
  - VESSEL CONTAINMENT & RECOVERY
  - SHORELINE CLEANUP
  - SHORELINE COLLECTION BOOMING
  - IN-SITU BURNING
  - WASTE MANAGEMENT
  - MEDIA MANAGEMENT
Any Questions?