

## Slide Notes – An environmentally responsible offshore petroleum industry

### Slide 7

Further Improvement Possible

Description of Control Measures

Lack of detail incorporated into response strategies can lead to;

Lack of appropriate evaluation of control measures

Lack of appropriate controls

Failure to demonstrate impacts and risks will be reduced to ALARP and be of an acceptable level

Submissions need to strike the balance between 'stating your case to operate' and 'executable planning'

The OSCP is an operational component of the implementation strategy

Information presented in the EP is not required in the OSCP and vice versa. All component documents are considered a single submission

Information in the plan should assist a responder in achieving the plans objectives

Plans should include affirmative language of what will be done to manage the risk rather than training doctrine

Evaluation of Impacts and Risks from Control Measures

Control measures implemented in an emergency might introduce significant impacts and risks that need to be evaluated.

The submission must demonstrate that these impacts and risks are both ALARP and acceptable.

Demonstrated access to Resources to Implement Control Measures

The submission must demonstrate the arrangements in place to access to resources required to implement control measures. In short, what provides you the assurance that control measures will be implemented.

What equipment is available and when can it be mobilised?

What personnel are available and when can they be mobilised?

Do they have the required training and competence for this circumstance?

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There are no prescriptive requirements for how monitoring should be included in the EP planning and implementation process and there are many ways that monitoring can be used by operators to demonstrate that the acceptability criteria outlined in the regulations are being met.

This gives operators the flexibility to tailor monitoring solutions to their particular circumstance and to the nature and scale of their activity, for example 'end-of pipe' style monitoring for discharges where risks and impacts are well understood and low vs monitoring programs in the receiving environment where risks and impacts of activities are not well understood and potentially of high consequence such as unplanned hydrocarbon spills at the other end of the scale. NOPSEMA supports this approach and it allows operators to demonstrate that they are operating in accordance with principles of ecologically sustainable development.

Some of the more obvious links to monitoring within regs include performance objectives and performance standards to set the level of environmental performance to be achieved during the activity and then provide a means by which to measure that performance in the environment.

Inclusion of monitoring as a control with associated performance standards in adaptive management scenarios where impacts from the activity may not be well known and certain responses in the environment detected during monitoring can be used as early warning systems to result in changes on board the rig or as part of an emergency response.

Implementation strategy – outlines the specific systems, practices, procedures relating to monitoring environmental performance.

On a broader level the Montara Commission of Inquiry final report indicated the need for adequate baseline data to be collected by operators and monitoring plans to be designed implemented in the event of a spill – OSMPs should be developed and submitted to NOPSEMA as part of the EP and OSCP.

#### **Slide 10**

Specific areas of focus by NOPSEMA related to monitoring that require improvement by operators

Clear links throughout the plan between impacts and risks, choice of indicators, monitoring design and what the monitoring data will be used for

Also focussed on the implementation of monitoring – will it achieve what is claimed and can it be implemented in the timeframe allocated by the operator