

Considerations when preparing for decommissioning activities

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Criteria to address	International Framework and Guidance ^{1, 2, 3}	Issues, impacts and risks to be considered when preparing for decommissioning activities
<p>Navigation Ensuring that property does not cause an unacceptable impact and risk to other marine users</p>	<p>IMO Resolution – Guideline 2.1.1 IMO Resolution – Guideline 2.2 IMO Resolution – Standard 3.6 London Protocol RSG – Guideline 3.8.5.1 London Protocol RSG – Guideline 6.6</p>	<p>What are the navigation risks for shipping?</p> <p>What are the risks for commercial fishing activities? (e.g. snagging risk for trawl fishing)</p> <p>Is there potential for infrastructure to restrict future use of the seabed?</p> <p>Has there been consultation with relevant persons sufficient to allow the relevant person to make an informed decision on the consequences of the activity?</p> <p>Was an assessment of the merits of any objection or claim about the adverse impact of the activity undertaken?</p>
<p>Contamination Consideration of any pollution or contamination resulting from the deterioration of property</p>	<p>IMO Resolution – Guideline 2.1.2 IMO Resolution – Guideline 2.3 London Protocol Annex 2 – Paragraphs 7 & 8 London Protocol RSG – Guideline 4</p>	<p>What is the structure made from (chemical composition)?</p> <p>Is there any contamination of the infrastructure that has occurred during operations?</p> <p>Are there any contaminated materials within the infrastructure that can be removed?</p> <p>What are the timeframes associated with the breakdown and dispersion of the infrastructure?</p> <p>What are the sources, distribution, fate, consequence and persistence of contaminants from the infrastructure as it deteriorates?</p> <p>Is there a human health risk through contamination of catch taken in the vicinity of decommissioned petroleum activities?</p>

<p>Impact on marine environment Consideration of impacts and risks from the activity to the marine environment (excluding contamination which is addressed above)</p>	<p>IMO Resolution – Guideline 2.1.3 IMO Resolution – Guideline 2.3 IMO Resolution – Standard 3.3 London Protocol Annex 2 – Paragraphs 11 & 13 London Protocol RSG – Guideline 6</p>	<p>What are the impacts and risks of the decommissioning activity? (e.g. sediment, noise, light, air and greenhouse gas emissions)</p> <p>What role does the infrastructure play in local and regional ecological connectivity, and how will connectivity be affected with different decommissioning options?</p> <p>What is the current invasive marine species (IMS) status of infrastructure and what is the potential for different decommissioning options to spread IMS? Will enhanced connectivity contribute to the spread of invasive species?</p> <p>If the infrastructure is left in-situ, will it have any impacts on the marine environment? (e.g. aggregating fish species that make them more susceptible to overfishing, providing a habitat that encourages some species over others)</p>
<p>Stability Consideration of movement of infrastructure</p>	<p>IMO Resolution – Guideline 2.1.4 IMO Resolution – Standard 3.9</p>	<p>Is there a risk of infrastructure moving and causing damage to other infrastructure?</p> <p>Has there been a demonstration that the infrastructure is stable in all predicted metocean conditions?</p> <p>Has there been an evaluation of control measures that will be used to reduce the impacts and risks of the activity, which would include the requirement for monitoring?</p>
<p>Technical Feasibility Review of the technical feasibility of implementing the decommissioning activity</p>	<p>IMO Resolution – Guideline 2.1.5 IMO Resolution – Standard 3.5 London Protocol RSG – Guidelines 3.5 & 3.6</p>	<p>Have appropriate planning and studies been completed to demonstrate the technical feasibility of decommissioning the structure?</p> <p>If a case is made that it not technically feasible to remove infrastructure, is there justification for this position? (e.g. an independent review)</p> <p>What is the timing of decommissioning activities and management and monitoring of property before decommissioning complete?</p> <p>Have disposal pathways for removed infrastructure been addressed?</p>

<p>Reuse Potential Review of the potential to reuse property for an alternative purpose</p>	<p>IMO Resolution – Guideline 2.1.6 IMO Resolution – Standard 3.4 London Protocol Annex 2 – Paragraph 6 London Protocol RSG – Guideline 3.7</p>	<p>Is the condition of the infrastructure suitable for reuse?</p> <p>Is the timing of reuse compatible with the proposed decommissioning timeframe? (e.g. is there a gap between the end of use as a petroleum activity and the proposed new use)</p> <p>If there is a time gap, how will management, maintenance and monitoring of the infrastructure be undertaken?</p> <p>How will future decommissioning obligations and liabilities be managed following the reuse?</p>
<p>Liability Consideration of the long-term liability for any damage or loss associated with any property left in the marine environment</p>	<p>IMO Resolution – Guideline 2.4 IMO Resolution – Standard 3.11 London Protocol Annex 2 – Paragraph 16 London Protocol RSG – Guideline 9</p>	<p>Is there a requirement to monitor the infrastructure in the future?</p> <p>If future monitoring is required – who is the responsible party, and how would this be regulated?</p> <p>Which entity endures ongoing civil liabilities for any damage or loss resulting from unused infrastructure?</p> <p>Which entity endures liability for any contamination resulting from the infrastructure?</p>

¹ **London Protocol, Annex 2:** Annex 2 of the 1996 Protocol to the Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter, 1972 (as amended in 2006) - [available here](#)

² **IMO Resolution:** Resolution A.672(16), Guidelines and Standards for the Removal of Offshore Installations and Structures on the Continental Shelf and Exclusive Economic Zone, adopted on 1 October 1989 - [available here](#)

³ **London Protocol RSG:** Revised Specific Guidelines For Assessment of Platforms or Other Man-Made Structures at Sea (LC 41/17/Add.1, Annex 8) - [available here](#)

Note: this list is not exhaustive and should be assessed on a case-by-case basis through the preparation of an EP.