

# Decision-making principles and processes for offshore oil and gas assets: an NGO perspective

Dr David Santillo

Greenpeace Research Laboratories

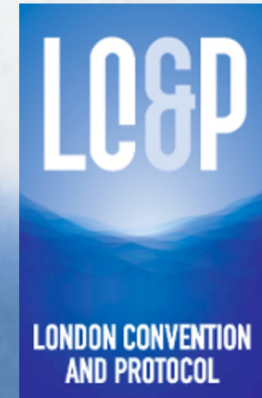
Innovation Centre, University of Exeter

# Personal experience with decommissioning

**Decommissioning consultations  
(formal and informal), incl.:**



**Ekofisk (Phillips)  
Maureen (Phillips)  
Frigg (Total)  
North West Hutton (Amoco/BP)  
Miller (BP)  
Murchison (CNR)  
Ninian (CNR)  
Dunlin Alpha (Fairfield)  
Brent (Shell)  
Brae (TAQA)**



**Monitoring of academic  
developments, e.g. INSITE, MASTS**

**Engagement with other NGOs**

# Greenpeace & OSPAR Decision 98/3

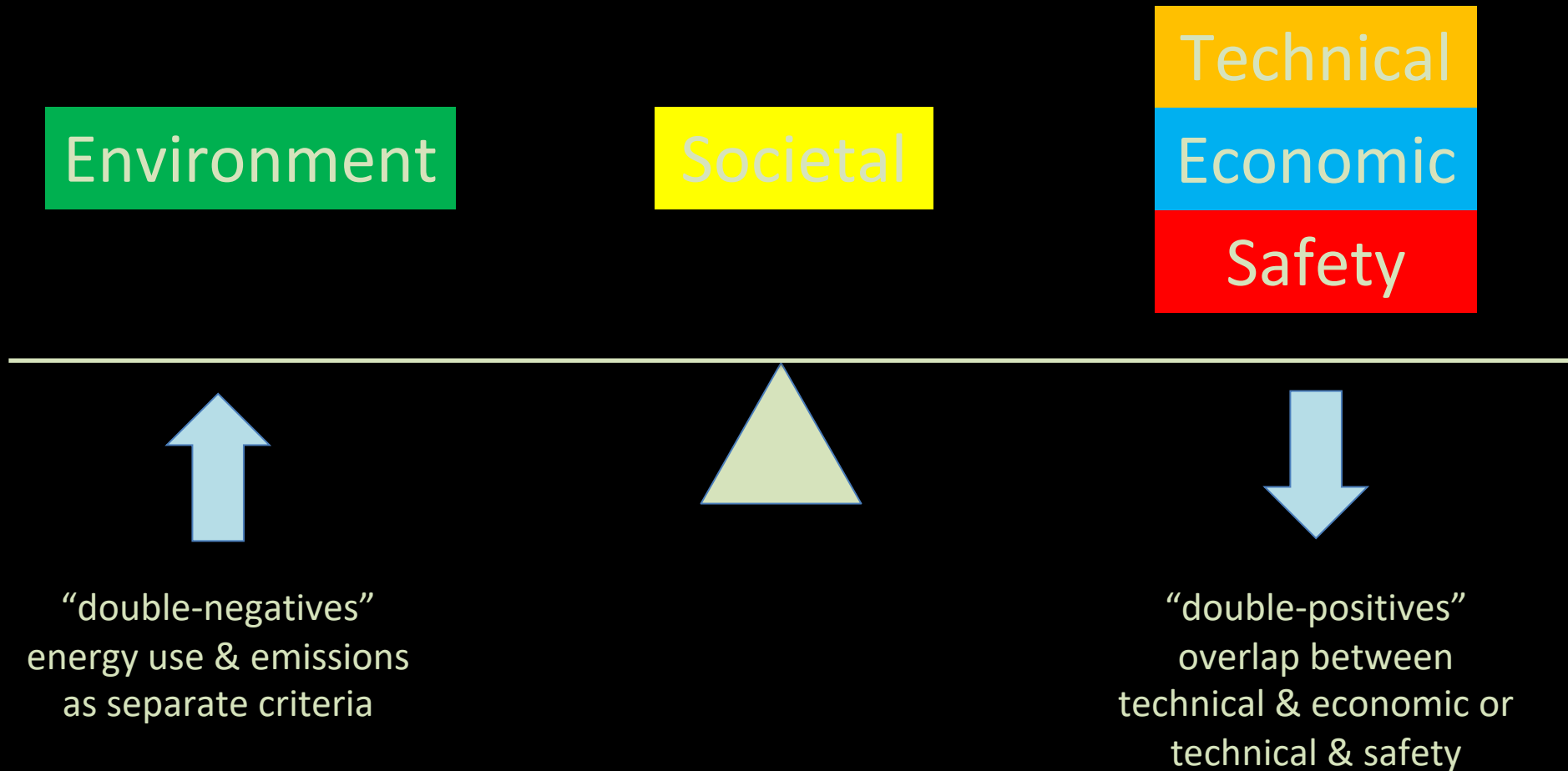
- Greenpeace supports the proper implementation of OSPAR Decision 98/3 and has therefore not routinely opposed derogation requests...only those that do not follow requirements or spirit of 98/3
- 98/3 was a progressive but pragmatic decision with the protection of the environment at its heart
- Requires ambition & investment, not the impossible
- Has worked effectively & driven development (though not fast enough)
- Still has overwhelming support from the vast majority of NE Atlantic states, from NGOs & from IOGP (as of last OSPAR review in June 2018)
- Could be a model for application to decommissioning in other regions

# OSPAR Decision 98/3 supports...

- The principle of restoring a “clean seabed” as far as possible (notwithstanding weaker rules relating to cuttings)
- A circular economy approach in relation to materials recycling and reuse
- Corporate responsibility for wastes, including end-of-life structures at sea and associated wastes
- Technological development, innovation & growth in the decommissioning sector and
- Better design for the future

**BUT it needs to be better implemented...especially the CA process**

# Comparative Assessment: the (im)balance of criteria



# OSPAR informal CA meeting, December 2019

- Parties acknowledged concerns about current application of CA process, including:
  - Weighting approach could be misleading – relate back to criteria under Annex 2 of 98/3 instead
  - The way criteria and sub-criteria were formulated could create some inherent bias
- Agreed standing agenda item on technical development to further reduce derogations (*\*needs to be a dynamic agenda item also*)
- Plus a need to improve value of stakeholder engagement (including commitment from the industry)

# More value from stakeholder engagement...?

- Be guided by the objective to protect the environment, and not by an inherently preferred technical option
- Engage with stakeholders in genuine and transparent dialogue, before making a decision
- View decommissioning as a common enterprise for the future (along with governments, civil society & even other operators)
- Give access to all supporting technical documents, independent reviews and exchanges with stakeholders in full, alongside the decommissioning proposal
- Invest more proactively in R&D to improve capabilities

# Technical progress: not just about cutting and lifting

- There is a need for further improvements in cutting thicker, deeper and more complex structures and for lifting larger and heavier sections
- But there is also a need for much more technical development in:
  - accessing internal spaces within structures for assessment and cleaning
  - representative sampling and comparative analysis of wastes within and surrounding structures (e.g. cell contents, drill cuttings)
  - safe and effective retrieval of contaminated sediments and other such wastes for treatment onshore



# Rigs to reefs (of convenience?)

- Marine species take advantage of any hard surfaces placed in the sea for attachment or aggregation....even barrels of waste, abandoned fishing gear & plastic litter
- Cannot assume localised increase in species abundance or biomass is always a good thing for the surrounding environment
- If there is genuine justification for constructing an artificial reef (e.g. for conservation purposes), OSPAR has separate guidance, requiring:
  - specific design, construction and impact hypotheses
  - detailed long-term monitoring to test hypotheses
  - commitment to remove the reef if hypotheses are not met
- Allowing abandonment of platforms could just create “reefs of convenience” - a loophole allowing dumping by another name



## OSPAR Guidelines on Artificial Reefs in relation to Living Marine Resources<sup>1</sup> (Reference number: 2012-3<sup>2</sup>)

### 1. Introduction

1. Artificial reefs are used in coastal waters in many regions of the world for a range of coastal management applications. The development of artificial reefs in the maritime area is still in its infancy. Among the uses being examined by the scientific community are:
  - reduction of flooding and coastal erosion;
  - providing sheltered anchorages for shipping and small boats;
  - development of habitat for crustaceans fisheries (e.g. lobsters), particularly in conjunction with juvenile restocking;
  - providing substrate for algae or mollusc cultivation;
  - providing means of restricting fishing in areas where stocks are in need of protection;
  - creating fish aggregation areas for fisheries, sport anglers and diving;
  - replacing habitats in areas where particular substrates are under threat;
  - mitigation for habitat loss elsewhere (e.g. consequence of land reclamation);
  - production of marine resources.
2. These guidelines were adopted in pursuance to Article 6 of Annex II and Article 10(d) of Annex III of the OSPAR Convention, initially in 1999 and reviewed in 2012. Their purpose is to assist Contracting Parties in considering the consequences for the marine environment of the placement of artificial reefs on the seabed. Construction of artificial reefs is one example of 'placement' and the guidelines that follow contain elements that are relevant for a wide range of other coastal and offshore developments that have potential to cause adverse effects in the marine environment and that, therefore, should fall under the control of appropriate national authorities.
3. Article 1(g)(ii) of the OSPAR Convention excludes from the definition of 'dumping' the placement of matter for a purpose other than the mere disposal provided that, if the placement is for a purpose other than that for which the matter was originally designed or constructed, it is in accordance with the relevant provisions of the Convention.

<sup>1</sup> These guidelines are established for the specific purpose of considering the consequences for the marine environment of the placement of artificial reefs on the seabed specifically built for protecting, regenerating, concentrating and/or increasing the production of living marine resources, whether for fisheries or nature conservation. For other purposes reference should be made to the London Convention and Protocol / UNEP Guidelines for the placement of artificial reefs – UNEP Regional Seas Report & Studies No. 187.

<sup>2</sup> These Agreements replace Agreement 1999-13.

# Greenpeace has no permanent allies or adversaries

- Commissioning (of renewable energy solutions) is as important as decommissioning (of old oil and gas infrastructure)
- All companies have the ability and responsibility to shift and become the sustainable energy providers of the future

