

SESSION 3 – ENVIRONMENTAL PERSPECTIVES TO DECOMMISSIONING: an NGO perspective

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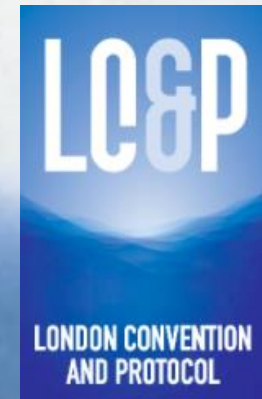
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Personal experience with decommissioning

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

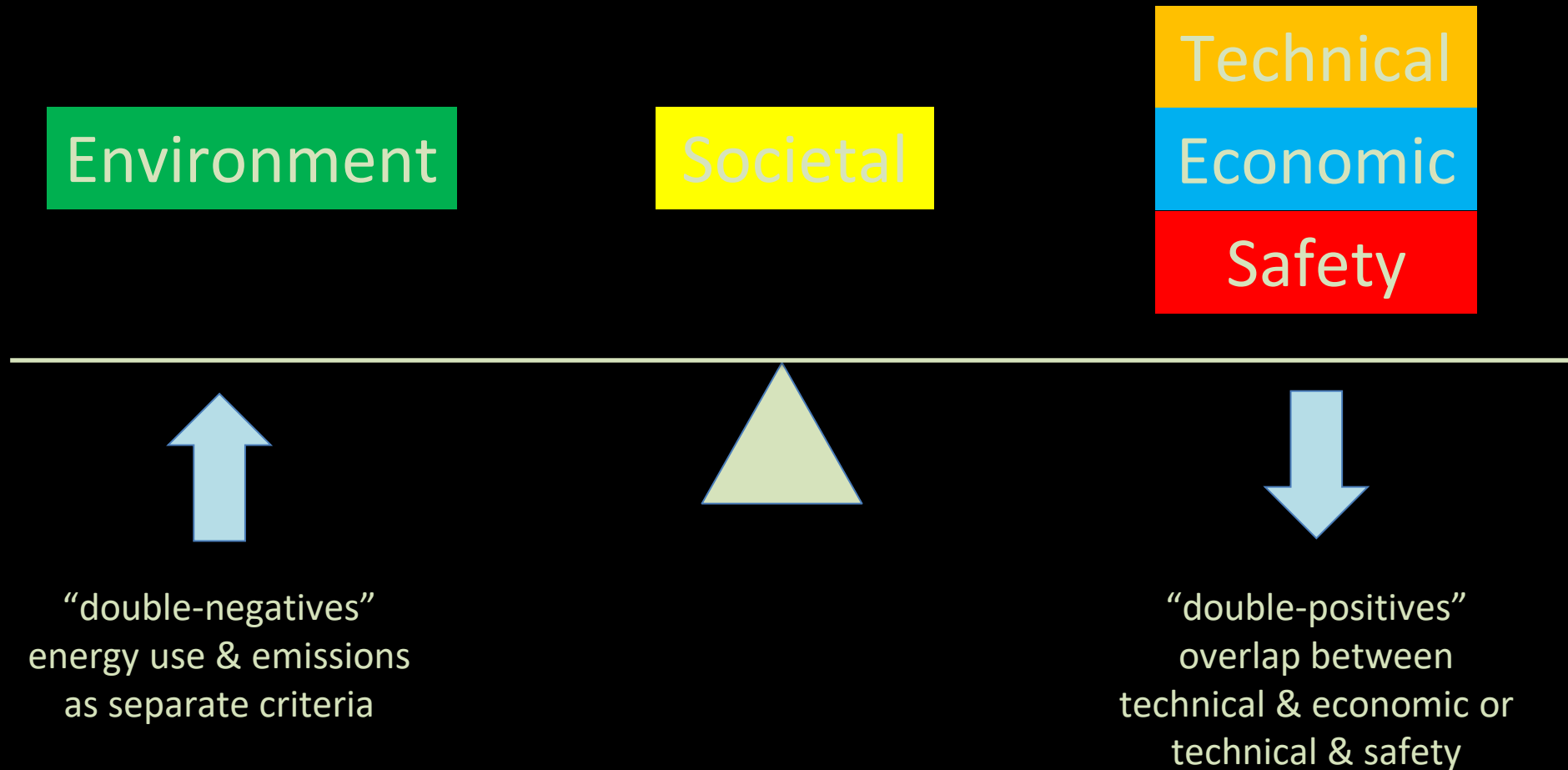
- Greenpeace supports the proper implementation of OSPAR Decision 98/3 and has therefore not routinely opposed derogation requests...only those that do not follow requirements or spirit of 98/3
 - 98/3 is progressive but pragmatic, with environmental protection at its heart
 - requires ambition & investment, not the impossible
 - has worked in practice & driven development (though not enough)
 - still has overwhelming support from OSPAR parties and observers
 - a model for 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 on Comparative Assessment

- Informal meeting in December 2019 acknowledged concerns about current application of CA process, including weighting and potential bias
 - agreed standing agenda item on technical development to reduce derogations, plus need to improve value of stakeholder engagement
- Ongoing discussions under Harmonised Comparative Assessment Methodology Workshop (HCAM), November 2023
 - drafting of more detailed description & flowchart of processes under 98/3
 - UK committed (1) to work towards increased transparency, (2) to bring in additional expertise to evaluate decommissioning proposals, (3) to work more closely with HSE on safety assessments and (4) to push operators to work together to consider technology development

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)
- Invest more proactively in R&D to improve capabilities
- Give access to all supporting technical documents, independent reviews and exchanges with stakeholders in full, alongside the decommissioning proposal

Technical progress: not just about cutting and lifting

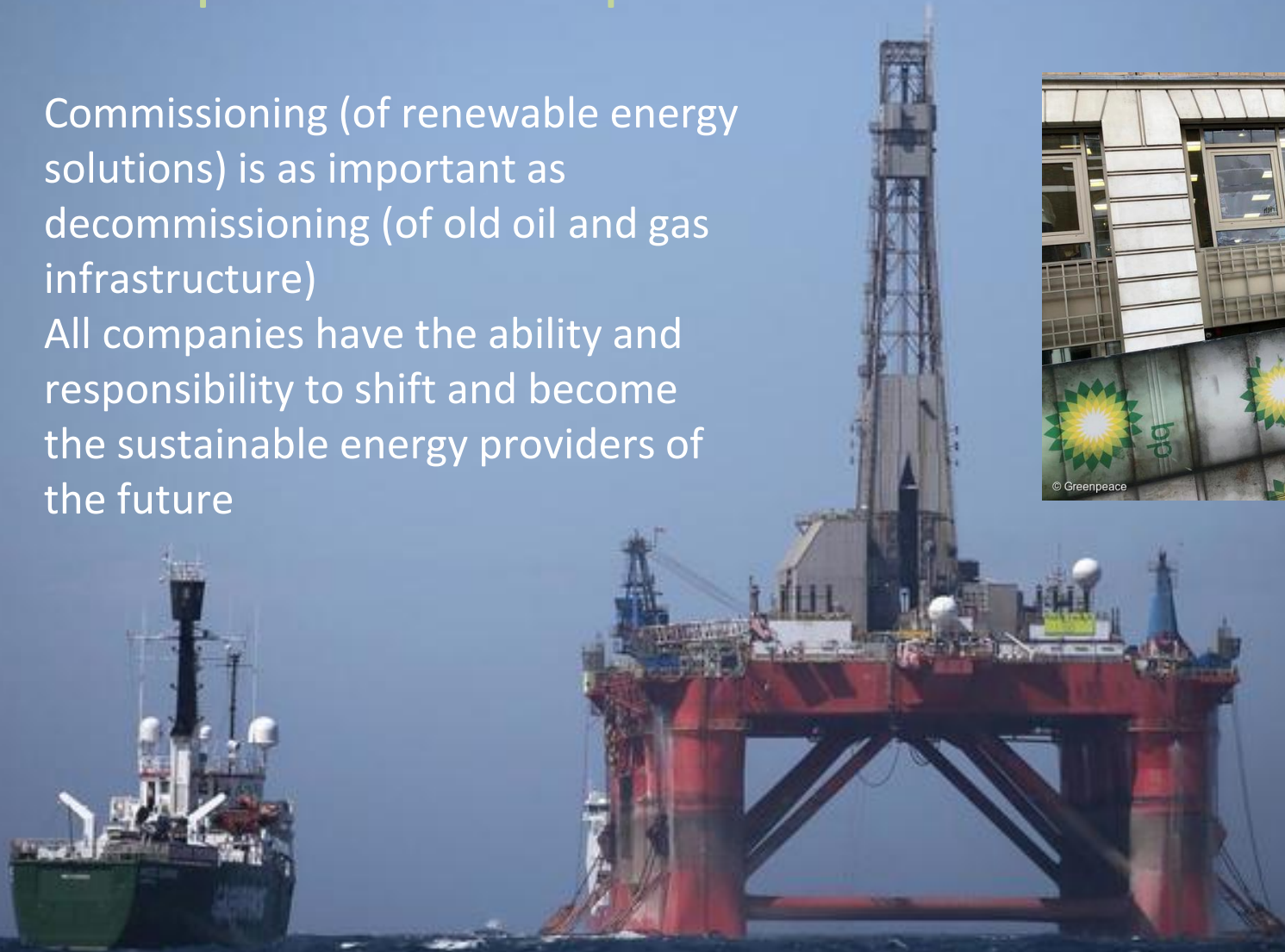
- There is a need for further improvements in cutting thicker, deeper and more complex structures and for lifting larger and heavier sections
- But there is also a need for much more technical development in:
 - accessing internal spaces within structures for assessment and cleaning
 - representative 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

Artificial reefs (of convenience?)

- Marine species take advantage of any hard surfaces for attachment or aggregation....even 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

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



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