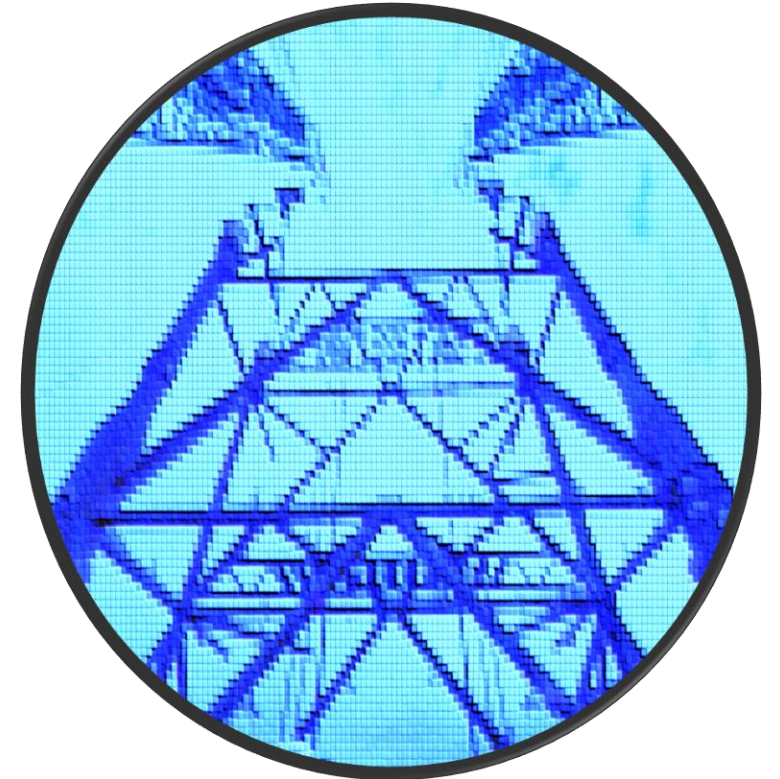


Effective Offshore Decommissioning Waste Management?

David Ogilvie (SEPA)
Mark Bayman (OPRED/ODU)

Content

- **Effective Offshore decommissioning waste management**
- **Key principles for management & reporting**
 - **Duty of Care**
 - **Waste Framework Directive alignment**
 - **Early Engagement**
 - **Improve waste inventory reporting**
 - **Active waste management planning**
- **Forecast waste activity**
- **Scale of decommissioning challenge ahead**
- **Questions**



Effective Offshore Decommissioning Waste Management

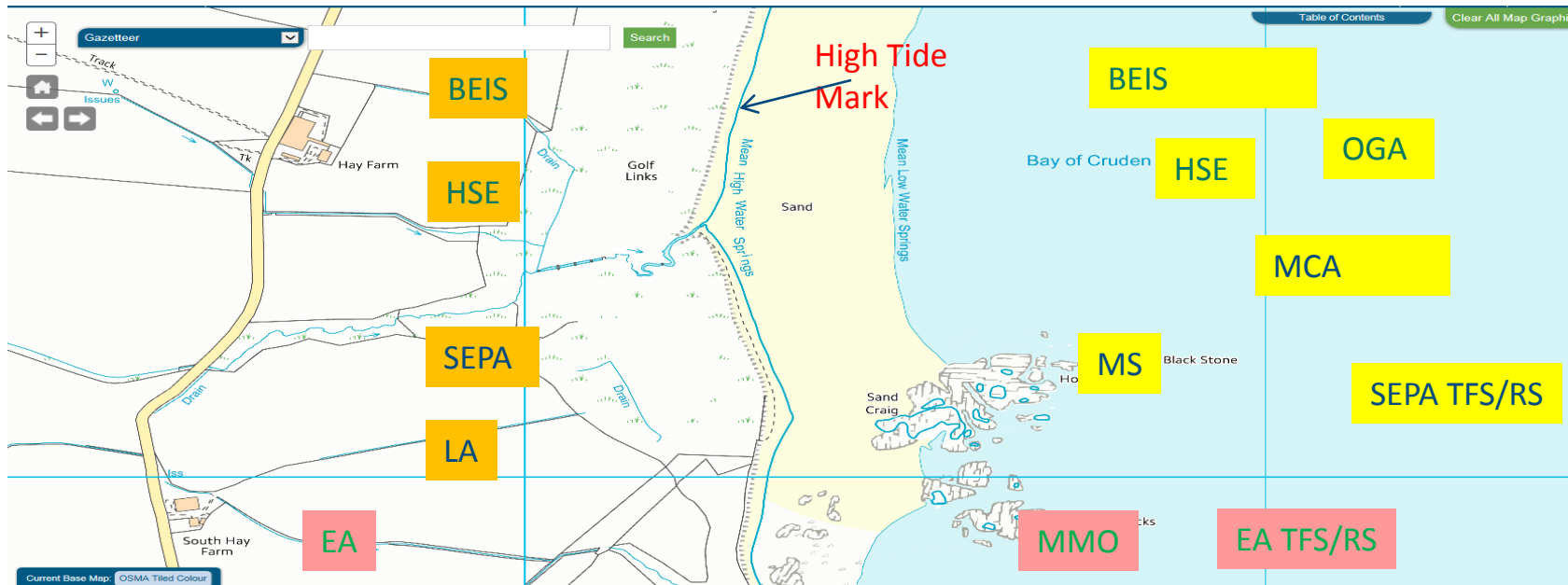
A generic lack of understanding of :

- Duty of care obligations by those producing and handling Decommissioning Waste
- The requirement to produce an accurate inventory of offshore waste
- Active offshore decommissioning waste management plans

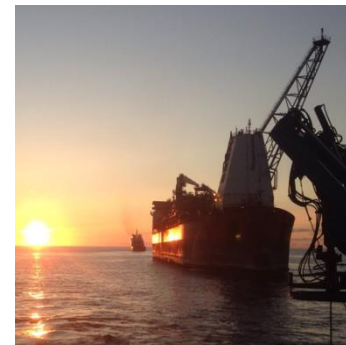
The consequences of not having this information means that;

- Decommissioning regulators have insufficient information on offshore decommissioning waste
- A loss of overall management control of decommissioning waste over the full life cycle
- Sub –optimal decommissioning waste solutions, resulting in double handling of hazardous waste
- Risks and consequences of handling & transporting waste not fully assessed and communicated to all

Regulators responsibilities & boundaries for decommissioning waste



- Numerous regulators all wanting information early in the process
- All starting to observe the impact of the management of offshore decommissioning waste by the oil & gas industry





5 Key principles for effective Offshore Decommissioning Waste Management

- **Duty of Care;**
- **Alignment with obligations of the Waste Framework Directive ;**
- **Early Engagement ;**
- Accurate **Waste Inventory** information and;
- Implementation of an **Active Waste Management Plan**

The 5 key principles are included in the updated ODU guidance, signposted to SEPA/ EA guidance and supported by development of waste regulation roadmaps (through work done by Decom NS/ D3consulting)

Key Principles for Waste Management






No 1 - Duty of Care

Offshore Decommissioning:

WASTE DUTY OF CARE

WASTE PRODUCERS: have a responsibility to take all reasonable steps to ensure that the waste is managed correctly throughout its complete journey to disposal or recovery

YOU must take all reasonable steps to:

- ➡  Accurately describe and classify the waste
- ➡  Check authorisation of the next waste holder
- ➡  Ask the next waste holder where they are taking it
- ➡  Carry out detailed checks if you suspect non-compliance
- ➡  Prevent the escape of waste from your control



The Environment Protection Act 1990 Section 34 covers the Waste Duty of Care obligations;

- For a producer, waste broker or waste dealer
- Clarifies the responsibility for the correct assessment of waste

Duty of Care lies with the Decommissioning Operator throughout the waste life cycle (until either finally disposed of or ceases to be classified as waste)

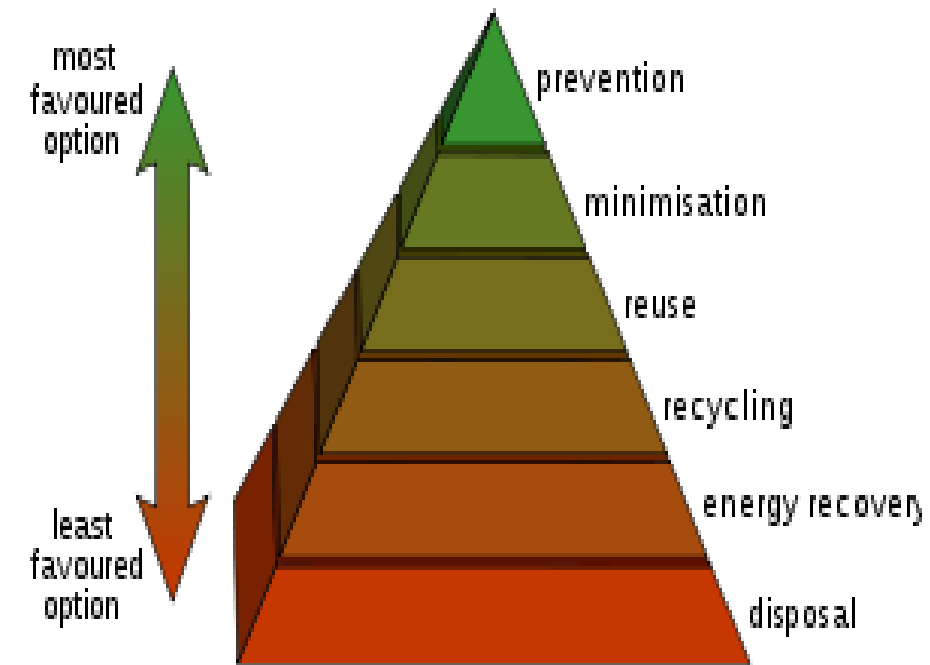
Key Principles for Waste Management

No.2 - Alignment with the Waste Framework Directive

- Preventing or reducing the adverse impacts of the generation and management of wastes - hence action required offshore to reduce the volume of waste sent onshore
- Reducing overall impacts of resource use
- Introducing the idea of a 'Waste Hierarchy' as best practice

Operators and waste contractors to align with the waste framework directive in order to minimise waste production

Definitions of waste are important!
Prevent Reuse, Recycle, Recovery and Disposal



(note that for offshore waste to be categorised for re-use, there has to be certainty, not just a possibility of re-use and Waste (Scotland) Regulations 2012 impose a legal requirement for high quality recycling)

Key Principles for Waste Management No 3 - Early Engagement



Key Principles for Waste Management

No 4 – Accurate Waste Inventory information

- Basis for this principle - Duty of Care
Provide an **accurate description of the waste** when it is transferred to another person
- Early Approved Decommissioning Programmes charted decommissioning waste, supported by simple waste categorisation information.
This information did not meet the requirements of waste stakeholders and waste contractors.
- **Actual waste inventories** received on licensed sites exceed those volumes / tonnages listed in the approved Decommissioning Programme
- Development work initiated to improve offshore waste inventory definition to improve reporting of waste volumes / tonnages (especially hazardous waste components)

Example : Ninian North Decommissioning Programme Waste Inventory listing

- It is recommended that the enhanced waste inventory listing is included in the **Active Waste Management Plan** , rather than the Decommissioning Programme

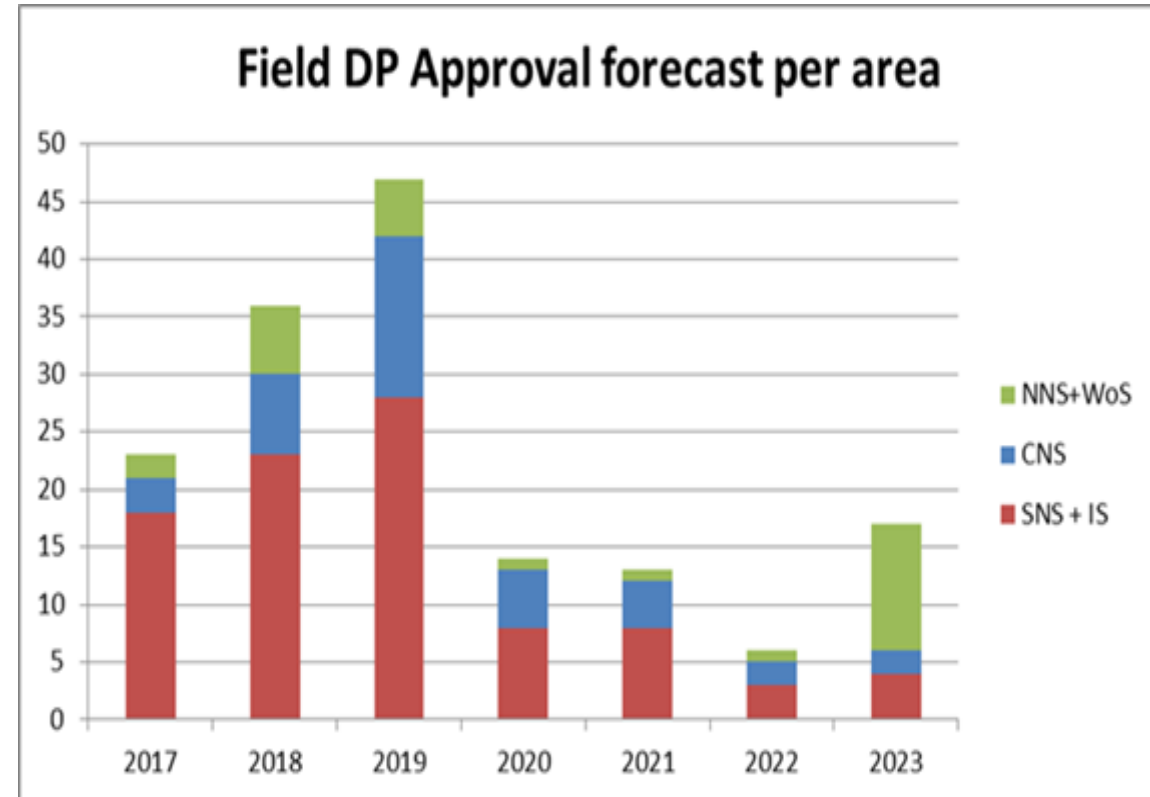
Key Principles for Waste Management No 5 - Active Waste Management Plan

- Introduction
- Responsibilities
(of all engaged in management of the offshore decommissioning waste lifecycle)
- Active Waste Inventory
- Management of Waste
- Regular monitoring & updating of plan & inventory
(throughout the full decommissioning waste life cycle)
- Regular reviews with regulators and key stakeholders
- Managed by a competent person
(throughout the full decommissioning waste life cycle)

Scale of the decommissioning waste challenge ahead

- 140 offshore installations likely to enter the Decommissioning Phase in the next 6 years
- 600,000 tonnes of potential offshore decommissioning waste to be shipped to shore
- Decommissioning Projects vary by size and complexity
- The Southern North Sea (SNS) area will see the majority of this decommissioning activity
- Will impact upon available resources (on and offshore)

It is essential to plan ahead and engage early with all waste stakeholders to attain the 5 key principles





Thank you for listening

and to all stakeholders that provided material for the presentation