

GOIA Comments on Guidelines for application, execution and reporting of offshore hydrocarbon exploration activities (excluding drilling) in Greenland; 31 August 2015

#	Page	Section	Par.	GOIA Comments
1	5	Introduction	2/3	<i>GOIA has reservations that such guidelines place unnecessary requirements on all non-drilling activities no matter how benign. This may exert an unreasonable burden on both operators and regulatory authorities giving rise to delay and implications where operating conditions are restricted due to weather and ice. GOIA supports appropriate applications and mitigations where impacts are foreseeable.</i>
2	8	3.5	-	<i>The application process is defined as taking 40 days for approval but it is unclear if multiple activities can be 'bundled' in a single application programme. Where multiple activities are planned potential for delay arises if only loosely related activities require separate applications.</i>
3	8	3.7	-	<i>The modification of activities requires further approval and the application must be 'well in advance of expected effectuation of the modification'. Field programme changes may be influenced by circumstances in location of interest and more dynamic circumstances. GOIA suggests consideration be given to a more flexible approach to approval of changes and these should apply where potential for material impact to safety, the environment or local community activities may occur. Clarity around what is meant by 'well in advance' is recommended.</i>
4	10	4.2.6	-	<i>GOIA recommends insertion of 'where an EIA/EMA' applies' at the end of this paragraph.</i>
5	11	4.2.6.1	-	<i>See comment on seismic guidelines regarding leaving anchors on the seabed.</i>
6	11	5.1	-	<i>GOIA suggests some clarification is made regarding stand-alone vessels or limited operations. The licensee performs acceptance work to satisfy themselves that the contractor operates systems and emergency mechanisms that are fit for purposes with evidence to the MLSA, other support mechanisms may be through IMO requirements such as MRCC arrangements.</i>
7	11	5.2	-	<i>Some smaller vessels operating on behalf of licensees may perform as other vessels in Greenlandic waters and may be unable to support aviation and/or the licensee may not have their own aviation or extended support services in place. Consequently, support services for injured parties will be dictated by the nature of injury and time to steam to nearest suitable port. For limited operations this will promote use of contractors with established and more extensive capabilities and may mitigate against selection of local suppliers.</i>
8	15	9	-	<i>Many of the specialist industry technical services will not be available in Greenland and GOIA suggests that recognition of this is clearer in the guidelines. Documentation of repeated requests to various Greenlandic enterprises for services which are clearly unavailable could give rise to stakeholder fatigue. It is suggested that key focal points are identified to optimise checking for local services (e.g. specific trade bodies) and in order to prevent protracted searches.</i>
9	16	10.1.1	-	<i>GOIA suggests clarification around availability of agreed data and that this should be following quality assurance/control and finalisation by the licensee.</i>