

# **Moving the EMP from the Shelf to the Field**

## **The SPDC experience**

**By**

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# PRESENTATION OUTLINE

- What is an EMP
- Components of an EMP
- Problems with EMP implementation
- Why implement EMP
- Constraints on EMP implementation
- EMP implementation: Cawthorne Channel AGG
- The new way of EMP implementation
- Areas for improvement
- Conclusion

# WHAT IS AN EMP?

**The EMP (Environmental Management Plan) is the part of the EIA that specifies how the adverse impacts of a project are to be managed.**

**It is regarded as the “aftercare product” of the EIA**

# COMPONENTS OF AN EMP?

- **Summary of predicted impacts**
- **Recommended mitigation measures**
- **Monitoring protocol**
- **Procedure for inspection, audit and review**

# PROBLEMS WITH EMP IMPLEMENTATION

- Only 3 of 30 Projects reviewed in an internal audit have any record of EMP implementation
- Regulators raised the issue of poor EMP implementation FMENV in 2001 & DPR in 2003
- EMPs are generic and lack details on implementation
- In cases where the EMP is implemented, scope of monitoring is different from scope in the EIA report
- There are no records of inspection, audit and reviews

# PROBLEM WITH EMP IMPLEMENTATION

These top-event derive from the fact that:

- EIAs are “shelved & forgotten” after approval
- EMPs are “buried” in EIAs that are seldom read
- No organizational framework for EMP implementation.
- EMPs are not properly handed over from project executors to facility operators
- EMPs were poorly developed and not project specific

# WHY IMPLEMENT EMP?

## THE BUSINESS NEED

- To ensure business is conducted in a socially and environmentally responsible manner
- To comply with regulatory requirements

# WHY IMPLEMENT EMP?

## BENEFITS OF IMPLEMENTATION

- Ensure Impacts do not exceed regulatory standards
- Feedback on effectiveness of mitigative measures for course correction & process improvement
- Demonstrable control over business' environmental impact
- Reputation of company is protected

## CONSEQUENCES OF NON-IMPLEMENTATION

- Withdrawal of EIA approval &/or fines by regulators
- Productivity loss from facility shutdown by communities/regulator
- Litigation
- Loss of 'social license' to operate



# CONSTRAINTS ON EMP IMPLEMENTATION

- **Role of EMP implementation has no focal point**
- **Monitoring costs are not contained in tender documents**
- **Current EMP implementation hindered by lack of funds**
- **The EIA reports are seldom read**
- **Some project engineers do not regard environmental issues as “core business”**
- **Conditions of EIA approval not recognized by project managers**

# EMP implementation Cawthorne Channel AGG

## Cawthorne Channel AGG Project:

- To deliver approx 200 mmscf/d of gas to customers
- Reservoir pressure maintenance
- A step towards SPDCs flares-out policy.

## Roots of Poor EMP Implementation:

- Cost implications of EMP implementation not spelt out
- Responsibilities for implementation activities not clear
- EMP implementation not a part of the scope of work that the contractor quoted for
- Specific Emergency Response plan not included in EMP
- Conditional (on EMP implementation) nature of EIA approval not

understood by engineers

# **EMP implementation Cawthorne Channel AGG**

## **Result:**

- **No budget for Implementation of EMP**
- **Implementation started late in Project Life-cycle**
- **Partial Implementation**

# THE NEW WAY

## 1. EMP EXTRACTED FROM EIA AS STAND-ALONE DOCUMENT

- Reduced the size of the document
- EMP document is reviewed & discussed with project team
- EMP documents is signed off by project manger

## 2. EMP DOCUMENT WERE RESTRUCTURED TO INCLUDE

- Project specific adverse impacts
- Mitigation measures
- Parameters to be monitored
- Frequency of monitoring

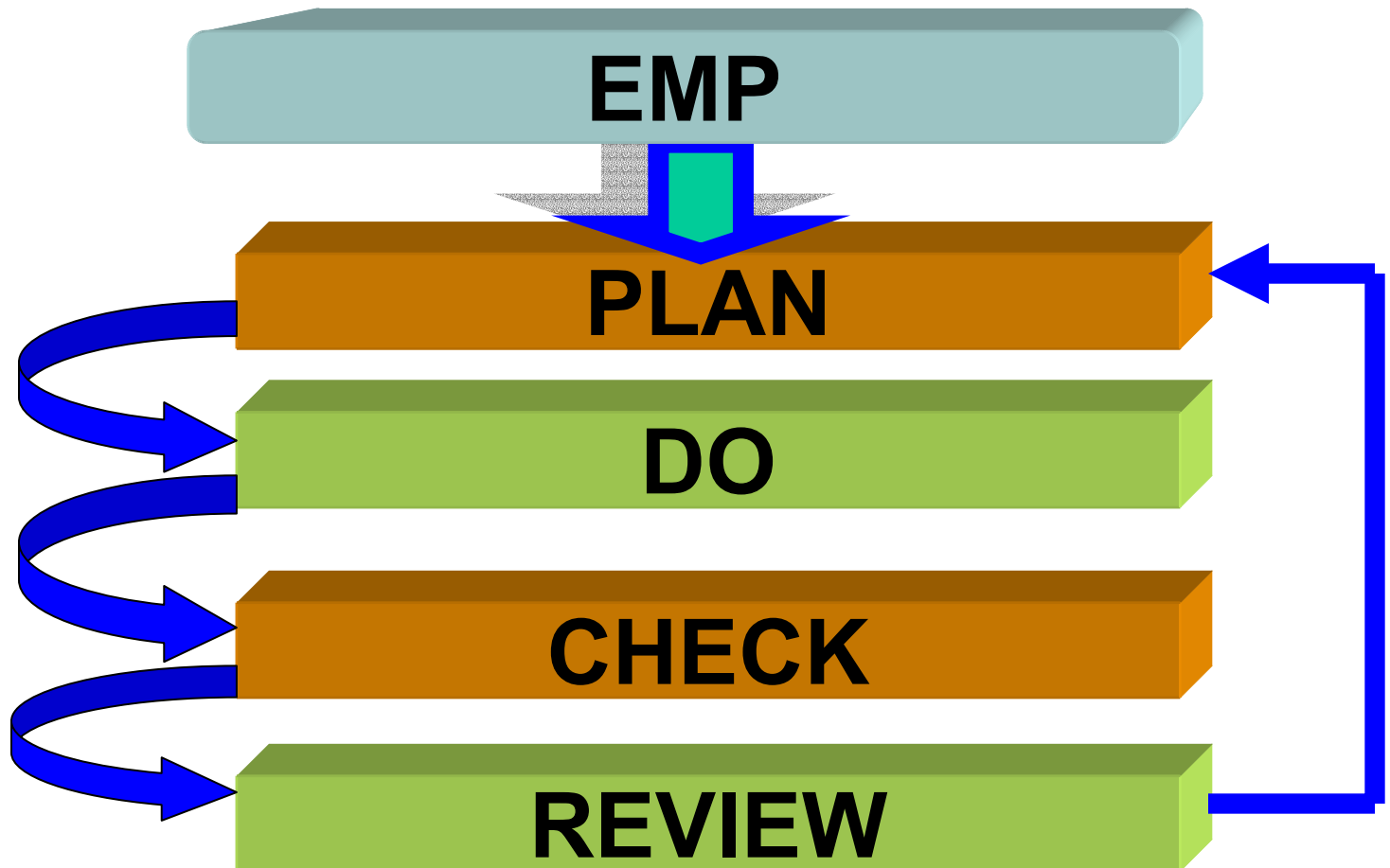
- Responsible party for each activity

## **AREAS FOR IMPROVEMENT**

- **Inclusion of monitoring parameters in tender packages**
- **Environmental Liaison Officers (ELO) should be nominated for projects**
- **Improved internal audit of EMP implementation**
- **Awareness training for project executors**

# CONCLUSION

PROCESSES MUST BE SUBJECT TO CONSTANT REVIEW & CONTINUOUS IMPROVEMENT



**THANK YOU**

## **ADDITIONAL COMPONENTS OF AN EMP**

- **Summary of applicable regulations**
- **Implementation Schedule**
- **Estimated cost of implementation**
- **Waste management plan**
- **Emergency response procedure**



# PRESENTATION OUTLINE

- WHAT IS AN EMP?
- WHAT ARE THE ISSUES IN EMP IMPLEMENTATION?
- WHY IMPLEMENT EMP?
- HOW WELL ARE DOING?
- EMP IMPLEMENTATION CAWTHORNE CHANNEL AGG (Case Study)
- WHAT ARE THE CONSTRAINTS TO PROPER EMP IMPLEMENTATION?
- WHERE DO WE WANT TO BE?
- WHICH WAY FORWARD?
- WHAT METHOD