NGO Statement on proposed construction of new Sakhalin II oil & gas platform off Sakhalin Island (Southern Piltun)


The above mentioned NGOs strongly oppose the proposed construction of a new oil and gas platform and associated subsea pipeline off the East Coast of Sakhalin Island (Southern Piltun). We also oppose SEIC’s proposed 2011 2D seismic survey in preparation for this platform. We urge the WGWAP to strongly recommend that SEIC not develop this platform.

1) The potential impacts of platform construction on WGW are significant
The negative impacts of construction of a new platform on WGW would include:
- Additional acoustic pollution directly east of an area of high WGW density (ie critical feeding habitat), including the near-shore area, particularly during preparatory and subsequent periodic seismic work, as well as platform construction and operation.
- Additional vessel traffic operating directly through areas of high WGW density, increasing risk of vessel strikes and acoustic noise which may impede feeding. Vessel strikes can be lethal, and thus this represent a heightened level of threat in this circumstance as - due to an extremely small population size - WGW could be driven to extinction by the mortality of just a small number of reproductive females.
- Increase (by 50%) the risk of a Sakhalin II platform-related oil spill, as well as additional subsea pipeline accident risk. Adequate technologies do not currently exist to adequately clean up oil spills in icy waters without significant environment damage occurring. The possibility of an oil spill from this new platform negatively impacting WGW critical feeding habitat adds to what is already an unacceptable risk from existing platforms.
- Impacts from exploratory and productions wells, including water pollution and negative impacts to the benthos and other elements in the surrounding marine ecosystem from drilling, discharge of cuttings, and produced waters.

2) WGW are likely already stressed from industrial activities in 2010, and assessment of the full range of impacts (including impacts to feeding and reproduction) of the 2010 industrial activities will not be possible until late 2011. Thus additional industrial activities by SEIC (such as seismic surveys) should not be undertaken in 2011.
These additional negative impacts would be cumulative to the existing anthropogenic threats to the WGW population. Anthropogenic impacts on WGW may have been severe in 2010, and include:
- Major seismic survey within the northern third of the ‘inshore’ WGW feeding area (Lebedinskoe survey, Rosneft)
- Major seismic survey within the ‘offshore’ WGW feeding area (Gasprom)
- Major seismic survey East of WGW ‘inshore’ feeding area (Ashtokh, SEIC.)

The Ashtokh survey operated with a comprehensive monitoring and mitigation plan which aimed at minimising the impacts on the WGW. The other two surveys did not have such comprehensive monitoring and mitigation plans, and the Rosneft survey was seen to violate even Rosneft’s own basic guidelines on minimising impacts on WGW (such as vessels cruising at speed in the direct vicinity of WGW causing rapid avoidance responses and repeated breaching, and conducting seismic tests at night.) The Ashtokh survey was conducted early in the season. The other two surveys occurred later in the season, when the greatest number of WGW were in the area, and apparently occurred in overlapping time periods.
The cumulative impact of these surveys, particularly the Rosneft and Gasprom surveys which occurred simultaneously in the two main feeding areas of WGW, could potentially have been severe, and the actual results are not yet known. It will be impossible to ascertain the level of impact on WGW until the whales have returned to Sakhalin for the 2011 season, and beyond, and data on body condition of these whales has been collected and analysed. If feeding was significantly disrupted in 2010 by the seismic surveys, it is possible that a proportion of WGW returning to Sakhalin in 2011 will be of compromised body condition and/or reproductive capacity.

3) Cumulative impacts must be evaluated before any platform related activities commence
Currently it is still not possible to fully evaluate the cumulative impacts on WGW from the variety of different off shore oil and gas activities off Sakhalin Island. Best international practice includes evaluation of cumulative impacts is, and is the only way to ascertain the true impact of current and additional projects on WGW. For a project of the scale and potential impact of a new offshore platform, a full analysis of the impacts of the entire project, including its cumulative impacts in relation to the operations of other companies in the area, is essential, before any decision whether or not to approve any new project and all related operations, is undertaken.

4) There does not appear to be a good reason why the 2D seismic survey needs to happen in 2011
SEIC have reiterated that a potential third platform is a long term project, and a decision whether or not to go ahead would not be taken for several years. Therefore as the purpose of the planned 2011 seismic survey is exclusively to investigate possibilities to construct and operate a platform several years into the future, there appears to be no necessity to conduct the seismic survey in 2011. Rather, full analysis of the impact of the seismic surveys which took place in 2010 could be conducted first through completion of analysis of WGW monitoring in 2010 and the condition of WGW in summer 2011. This would allow for an appropriate assessment and recommendation on the implications of a second seismic survey.

5) Observer consultation has not been conducted in good time
SEIC only disclosed its intention to build a 3rd platform to observer organizations (NGOs and lenders) at this week's WGWAP meeting, despite that, as we have since learned, SEIC has been considering this third platform since at least 2003, and has already put out a tender for the seismic survey. Some fundamental decisions, including the ruling out of some design alternatives, appear to have already been made. Most fundamental details, such as the proposed route of the associated subsea pipeline(s), have not been disclosed even in the most cursory form. This contradicts the repeated call for information on company activities to be presented to the WGWAP and observer organizations in a timely manner. As a result, observers have not been afforded adequate time to fully respond.

6) The construction of a new platform fundamentally changes the full Sakhalin II project scope
Prior WGWAP recommendations (which are required by lenders), including those on whether previous project elements should occur at all, and subsequently of prevention and mitigation measures were based on an assumption that a total of two platforms would be built. (The same is true of prior lender decisions, and Russian environmental regulatory decisions.) Thus, SEIC’s revelation brings into question whether the WGWAP should review the adequacy of prior recommendations.