

# Annex F

## Decommissioning and Rehabilitation Plan

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## **GLOSSARY**

*“Decommissioning”* is the process by which options for the physical removal, of structures at the end of their working life are assessed and implemented, including dismantling, removal / recycling and disposal.

*“Rehabilitation”* is defined as the return of disturbed land or seabed to a stable and productive condition.

*“Closure”* is defined as the period after the end of commercial gas extraction and LNG processing. During this phase of the Project, decommissioning and rehabilitation activities are conducted, sometimes over a period of several years.

**F1.1**      **PURPOSE**

This Decommissioning and Rehabilitation Plan (DRP) is a set of guidelines and actions aimed at ensuring that decommissioning and rehabilitation activities will be undertaken in a manner that minimizes environmental, health and safety and social (EHSS) risk. Some aspects of the DRP will be implemented during construction and operation as various disturbed areas are rehabilitated <sup>(1)</sup> but the bulk of the commitments in this plan will be implemented when operations cease.

In accordance with legislative requirements and in the light of the lengthy period of time between when the environmental permit is granted (or Project sanction) and decommissioning, the requirement for an updated detailed DRP is deferred until two years before closure and decommissioning activities are due to commence. This document should therefore be considered as a framework DRP.

**F1.2**      **OBJECTIVES**

The Plan is intended to achieve the following objectives:

- To comply with Mozambican legislative and regulatory requirements for a decommissioning and rehabilitation plan.
- To identify measures to rehabilitate land disturbed during construction and operation.
- To identify measures to rehabilitate land once the Project is decommissioned.
- To investigate possible measures to manage materials and waste arising (including any hazardous wastes) from decommissioning activities.

**F1.3**      **SCOPE**

This plan applies to the area of influence of the Liquefied Natural Gas (LNG) Project (hereinafter referred to as the “Project”). The area of influence for the decommissioning activities includes the onshore Project area (the LNG Facility and associated infrastructure) and the offshore Project area which encompasses the Golfinho, Prosperidade and Mamba Gas Fields (the subsea pipelines, wells, trees and manifolds).

(1) In many cases there are opportunities for progressive rehabilitation rather than all rehabilitation taking place at the same time after project closure.

#### **F1.4 THE PROJECT PROPONENT**

AMA1 and eni are joint proponents for the Project . Anadarko Moçambique Área 1, Lda (AMA1), a wholly-owned subsidiary of Anadarko Petroleum Corporation (APC), is a commercial entity duly registered under the Republic of Mozambique Laws. AMA1 holds exploration rights to explore, develop and produce natural gas reserves in Area 1 Offshore in the Rovuma Basin. Likewise, eni holds rights to explore and develop natural gas reserves in Area 4 of Rovuma Basin. eni East Africa S.p.A (eni) is an affiliate of eni S.p.A., an Italian company and has a branch in Mozambique with offices in Maputo and Pemba.

These areas are positioned adjacent to one another and a number of gas reservoirs or gas fields have been discovered within each of the areas. The Proponents will develop these reserves in compliance with the applicable Mozambican laws and regulations.

#### **F1.5 ENVIRONMENTAL CONSULTANT**

The Project has commissioned ERM Southern Africa (Pty) Ltd in association with Impacto, Projectos e Estudos Ambientais Lda (Impacto) to undertake an Environmental Impact Assessment (EIA) for the LNG Project which includes the requirement for a DRP.

##### **F1.5.1 Project Management Team**

The key Project Management Team responsible for the management of the EIA process is outlined in *Table 1.1*.

**Table 1.1 Project Management Team**

<b>Role</b>	<b>Name</b>	<b>Organisation</b>
Partner in Charge	Andrew Bradbury	ERM
Partner in Charge	Antonio Emilio Leite Couto	Impacto
Project Manager	Kamal Govender	ERM
Assistant Project Manager	Uke Overvest	Impacto
Assistant Project Manager	Isobel Evans	ERM
Assistant Project Manager	Chris Zeisloft	ERM

## F2.1 MOZAMBICAN LEGAL FRAMEWORK

### F2.1.1 Overview

As discussed in *Chapter 2* of this EIA Report, the Project will comply with Mozambican regulatory requirements specific for petroleum (oil and gas) operations; including:

- Petroleum Law (Law no. 3/2001 of 21 February);
- Regulations on Petroleum Operations (Decree no. 24/2004 of 20 August);
- Environmental Regulations for Petroleum Operations (Decree no. 56/2010 of 22 November);and
- Regulation for the Licensing of Petroleum Installations and Activities (Ministerial Diploma no. 272/2009 of 30 December).

The preparation of a Rehabilitation and Decommissioning Plan is a requirement of each of these legal documents. The Project will undertake all activities in accordance with the applicable Mozambican legislation. The specific requirements are set out below.

#### *Petroleum Law- Law no. 3/2001 of 21 February*

Article 17e) of the Petroleum Law requires the proponent to ‘submit a Decommissioning Plan to the competent entity, not later than two years before the planned termination of production’. Under the Petroleum Law, a decommissioning plan is defined as: ‘A plan for the closure of Petroleum Operations including the removal and disposal of all installations’.

The Law does not detail the requirements for rehabilitation, however in Article 23.1e) it states that operators must: ‘Clean up the sites after the closure of Petroleum Operations and comply with the environmental restoration requirements’.

#### *Regulation of Petroleum Operations- Decree no. 24/2004 of 24 August*

Article 25.2d) of the Regulation of Petroleum Operations states that the operator must submit a ‘Decommissioning Plan’ to the Minister with authority over the petroleum industry. Furthermore, according to Article 24 of the same Decree, the same Minister has powers to approve such a plan.

The decree regulates both the removal of installations (primarily concerning safety of navigation and other use of the sea) and disposal of materials from decommissioned infrastructure (primarily aimed at pollution prevention).

Article 32 of the Regulation of Petroleum Operations refers that *'a detailed Decommissioning Plan shall be prepared in consultation with the National Petroleum Institute, and submitted, no less than 2 years prior to the date on which production operations are expected to cease, for the approval of the Minister with the authority over the petroleum industry'*. The following items should be included in the update to the DRP two years before closure:

- a) *'Tail-end production schedules and the economic threshold for termination of operations;*
- b) *Alternatives for continuing Petroleum Operations;*
- c) *Further use or subsequent disposal of facilities;*
- d) *Plans for plugging and abandonment of production wells;*
- e) *Schedule for decommissioning activities and description of equipment needed for the restoration of land sites and/or seabed;*
- f) *Inventory of dangerous material and chemicals existent in the facilities and plans for their removal;*
- g) *Evaluation of environmental impact of termination and abandonment activities'*.

*Environmental Regulations for Petroleum Operations- Decree no. 56/2010 of 22 November*

A Rehabilitation and Decommissioning Plan (DRP) is a requirement of the Environmental Regulations for Petroleum Operations. According to Article 14 of this Decree, the DRP (which should be submitted with the EIA Report) should contain at least the following:

- a) *'Identification and professional domicile of the proponent;*
- b) *Identification of the environmental consultant registered or certified by the EIA Authority, as well as the team responsible for the prospective drafting of the EIS and their respective functions;*
- c) *Non-technical summary in respect of the main issues considered, conclusions and proposals;*
- d) *A description of the effects which removal, collection, disposal and decommissioning activities may have on the environment and commercial aspects in the Area of Influence;*
- e) *Description of the working methods and techniques for carrying out discharges and emissions related to the disposal of substances harmful to the Environment, in order to cure or attenuate any damage or negative effect;*
- f) *Description of the Areas of Influence;*
- g) *Description of the techniques for preventing hazards to human life and to the marine environment in the case of decommissioning of offshore facilities;*
- h) *Description of the treatment and disposal to be given to chemical and hazardous materials to be found in the facilities; and*
- i) *Restoration of the area and possible future uses'*.

*Regulation for the Licensing of Petroleum Installations and Activities - Ministerial Diploma no. 272/2009 of 30 December*

A Decommissioning License is required for the decommissioning of petroleum infrastructure under the Regulation for the Licensing of Petroleum

Installations and Activities. The license is granted by a competent entity for the licensing of petroleum installations. This entitles its holder to initiate the closure of its activities, removal or re-use of the petroleum installations and restoration of the sites which were affected by or at which petroleum operations were carried out.

In accordance with Chapter IV of this Ministerial Diploma, an application must be addressed to the President of the National Institute of Petroleum 120 days prior to the commencement of demobilisation activities and must include an approved decommissioning plan which considers alternatives assessed.

## F2.2 *INTERNATIONAL CONVENTIONS, STANDARDS AND GUIDELINES*

The process of decommissioning is also regulated by international conventions to which Mozambique is a signatory. There is a framework of international conventions which, in turn, influence national legislative requirements.

The primary conventions concerned are UNCLOS, the United Nations Convention on the Law of the Seas, 1982 and the 1972 London Convention (and the subsequent 1996 Protocol). In addition, various international organisations including the International Maritime Organisation (IMO) and the International Association of Oil & Gas Producers (OGP) set standards and guidelines for the removal of offshore installations worldwide. These are further detailed in *Table 2.1*.

**Table 2.1** *Key International Conventions and Organisations, Decommissioning*

<b>International Conventions</b>	
the United Nations Convention on the Law of the Seas, 1982 (UNCLOS)	Article 5.5 of the United Nations Convention on the Continental Shelf 1958 states that: ' <i>Any installations which are abandoned or disused must be entirely removed</i> ', however this was revised by the requirement of Article 60(3) of UNCLOS 1982 <sup>(1)</sup> which states: ' <i>Any installations or structures which are abandoned or disused shall be removed to ensure safety of navigation, taking into account any generally accepted international standards established in this regard by the competent international organization. Such removal shall also have due regard to fishing, the protection of the marine environment and the rights and duties of other States. Appropriate publicity shall be given to the depth, position and dimensions of any installations of structures not entirely removed.</i> '
London Convention, 1972	The 1972 London Convention (and the subsequent 1996 Protocol) made the provision of generic guidance for any wastes that can be dumped at sea. New guidelines were adopted in 2000, to specify different classes of waste, including platforms and other man-made waste.
<b>Organisations</b>	

(1) [http://www.un.org/Depts/los/convention\\_agreements/texts/unclos/unclos\\_e.pdf](http://www.un.org/Depts/los/convention_agreements/texts/unclos/unclos_e.pdf)

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**International Conventions**

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International Maritime Organisation (IMO)	The International Maritime Organisation (IMO), headquartered in London, sets out guidelines and minimum global standards for the removal of offshore installations. The IMO published guidelines and standards in 1989 addressing the decommissioning of oil and gas facilities (excluding pipelines), which served to effectively establish the agency as the competent international organization within the context of UNCLOS. The guidelines cover a range of areas, including those associated with the removal of offshore installations, and the circumstances in which all or part of an installation may remain on the sea-bed. While the 1989 guidelines are influential, they are non-binding legal principles unless otherwise given effect by member states in their national legislation, or through some other mechanism (eg, regional conventions).
International Oil & Gas Producers Association (OGP)	The OGP have established a Decommissioning Committee to address the challenges of handling offshore structures in a safe, environmentally protective and cost-efficient manner, taking into account prevailing regulatory requirements. The Committee aims to establish programmes to study environmental consequences of decommissioning, technology development, the sharing of best practices and benchmarking.

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**F3.1 OVERVIEW**

The construction and operation of the LNG Facility and associated infrastructure will require removal of vegetation, disturbance of seabed and consequent loss or impact to terrestrial and marine habitats, flora and fauna as assessed in *Chapters 11 to 14* of the EIA Report. Thus, it is important to undertake rehabilitation activities during the life of the Project and at the end of the Project's life span.

Decommissioning will be carried out in compliance with the relevant national legislation and international guidelines and standards, and will be in compliance with Project policies. Areas can also be decommissioned during the operational phase when particular infrastructure is no longer required for the development, eg when a well has been exhausted.

In certain circumstances infrastructure judged pertinent for the development of the district and province may be left *in-situ* rather than being dismantled, for example this may include buildings or jetty infrastructure which local communities may want to use. This will be reviewed on a case by case basis and agreed with the Ministry responsible for approving the DRP and granting a decommissioning permit. The Project will review and update this plan at two years before closure.

These proposed decommissioning activities are discussed further below with suggested measures for rehabilitation of the affected areas both onshore and offshore.

**F3.2 POTENTIAL ENVIRONMENTAL OR SOCIAL RISKS**

The decommissioning and closure phase of the Project can present some environmental or social risks including:

- Release of hazardous materials or wastes into the environment.
- Health and safety risks associated with demolition activities and/or poor rehabilitation (open pits, hazardous material or equipment).
- Release of untreated effluents into the environment.
- Pollution of adjacent wetlands.
- Further disturbance to terrestrial and marine habitats.
- Potential risks to fisheries.

- Visual impacts associated with a poorly rehabilitated site.

The following sections describe how these risks will be eliminated or minimised.

### F3.3

#### *PREPARATION FOR DECOMMISSIONING AND GENERAL PRINCIPLES*

Decommissioning procedures will generally entail the following activities:

- Operating processes both onshore and offshore will be systematically shut down in a safe manner.
- Liquids and wastes will be removed for treatment and disposal. This includes flushing and cleaning all pipelines (onshore and offshore) and tanks to remove hydrocarbons.
- Treatment and disposal of all hazardous materials or wastes (to be detailed when this plan is updated two years before closure when there will be a greater understanding of types and volumes of hazardous substances).
- The fate of the emptied and cleaned structures and equipment will be decided taking into account the best international practices of the oil and gas sector as well as national legislation at the time of decommissioning; recycling will be considered to the maximum extent possible.

Principles for rehabilitation or decommissioning of onshore facilities include:

- Plan the abandonment of facilities in consultation with statutory authorities, local community and other interested parties.
- Consult with local authorities and communities to determine which infrastructure can remain. Possible conflicts between local, district and provincial interests regarding the use of the rehabilitated roads will be solved by the competent Government authorities.
- Where required, formally transfer responsibility (for maintenance and legal compliance) for remaining infrastructure and facilities to identified third parties. Verify the recipient of any infrastructure is properly instructed in the safe operating methods and appropriate maintenance of the equipment.
- Consider the social/community implications when decommissioning.
- Identify suitable waste treatment, recycling and disposal sites for the equipment and materials that are dismantled;

- No equipment should be left or abandoned on site without the express approval of the relevant regulatory authorities and affected landholders.
- Surface infrastructure shall be incorporated into the final landscape through de-compaction, shaping, levelling, dressing with topsoil and vegetating with indigenous species. Where appropriate, a flora specialist should be employed to assist to planning for re-vegetation.
- The promotion of re-vegetation should be done through the encouragement of the natural secondary succession process. The accumulated reserves of surface soil should be introduced again in the cleaned area in the correct order and the original surface contours of the site should be re-created as far as possible. Any areas where surface vegetation has not been removed but has been compacted should be ploughed to allow the establishment of pioneer vegetation.
- Remove any alien/exotic vegetation.
- Any waste disposal facilities (if applicable) shall be reclaimed.

For near shore and offshore facilities, early planning for decommissioning is required to determine regulatory requirements and potential community use. Considerations to be taken into account prior to decommissioning activities include:

- Needs and views of other marine/resource users, natural resource managers and affected community groups.
- Current and likely future values and uses of the area.
- Potential to reuse or recycle material and equipment before considering disposal.

### F3.4

#### NEAR SHORE AND OFFSHORE DECOMMISSIONING AND REHABILITATION

The general objective of the decommissioning process is to carry out the partial or total dismantling of the gas field infrastructure. The gas fields will be progressively decommissioned and rehabilitated as core exploration, appraisal and production wells and associated infrastructure are no longer required.

Currently it is envisaged that typical decommissioning of the subsea system would encompass flushing the pipelines and umbilical tubes clean, removing subsea manifolds and plugging the wells and retrieving the subsea tree and jumpers. As many components as possible, particularly metal fittings, would be retrieved for reuse or recycling. The pipelines and umbilicals will be capped and left *in-situ* on the seabed. They will be secured to prevent them from being shifted by currents on the seabed and damage benthos (or become a hazard to navigation). Flexibles would be retrieved for disposal to landfill.

Notices to mariners would warn vessels to avoid the area during decommissioning.

The potential for reuse of the pipeline in connection with further hydrocarbon developments should be considered before decommissioning. If reuse is considered viable, suitable and sufficient maintenance of the pipeline must be detailed. This will avoid additional disturbance to the seabed thus considered to reduce negative impacts associated with decommissioning activities.

Wells will be cased, plugged, sealed and abandoned in accordance with industry standards and regulatory requirements. All waste materials and equipment generated from decommissioning will be managed in accordance with the waste management plan.

Near shore and offshore installations and structures will be addressed as follows<sup>(1)</sup>:

- Remove structures which may snag or entangle fishing gear or anchors.
- Remove structures which may present a collision hazard to shipping.
- Removal to be performed in such a way as to minimize any adverse impacts on navigation or the marine environment.
- Where structures remain above sea level, develop plans for their maintenance.
- Verify that all structures not completely removed are brought to the attention of the appropriate authorities to be recorded on nautical charts.

Rehabilitation of the seabed is not envisaged at this stage.

### **F3.5**

#### ***ONSHORE DECOMMISSIONING AND REHABILITATION***

For the onshore infrastructure, decommissioning entails demolition of buildings, removal of infrastructure, rehabilitation and re-vegetation. Decommissioning and demolition will also be influenced by the needs of local communities. Where buildings or infrastructure (eg roads or buildings) can be used by local communities, they will be left intact in agreement with the District authorities. All other infrastructure will be demolished and removed. All areas disturbed by the Project will be rehabilitated to a stable landform with a self-sustaining vegetation cover, with progressive rehabilitation commencing within one year of when areas become available for rehabilitation purposes. The land will be shaped, scarified and re-vegetated as appropriate.

(1) These provisions are based on the Australian Petroleum Production and Exploration Association (APPEA Code of Environmental Practice, 1996) which are in turn based on the IMO Guidelines and Standards for the Removal of Offshore Installations and Structures.

Surface and subsurface infrastructure will be addressed as follows:

- Areas disturbed during the construction phase that are no longer needed for operational phase activities will be scarified, shaped and re-vegetated during the operational phase; ie disturbed areas will be rehabilitated progressively.
- The feasibility of possible transfer of fixed assets with beneficial reuse to third parties will be considered.
- Surface infrastructure that has no beneficial reuse potential will be decommissioned and dismantled.
- Any wells (cased boreholes) for drinking water will be closed and sealed, with the exception of some which will be used for monitoring the ground water pre and post decommissioning. A formal request will be made to the local authorities to allow any monitoring boreholes to remain post decommissioning.
- Demolition waste will be removed and disposed of at an appropriate, authorised waste disposal facility.
- Areas from which infrastructure has been removed will be shaped, levelled and re-vegetated. Hydrologists and surface water ecologists will inform shaping and contouring plans.
- Pipelines may be left in place or, if they are above ground and interfere with human activities, removed for reuse, recycling or disposal. Pipelines left in place will be disconnected and isolated from all potential sources of hydrocarbons and sealed.
- All litter, parts and equipment will be removed and disposed of at approved disposal sites.
- All machinery will be disassembled and removed from the site.
- Access roads and airstrips of no further use will be stripped as required, however consideration will firstly be given to whether these will be useful for the district or region.
- Contour banks and energy dissipating structures will be constructed as necessary to protect disturbed areas from erosion prior to stabilisation.
- Disturbed areas will be re-contoured to approximate pre-existing contours and natural drainage restored as far as possible.
- Compacted areas will be scarified to promote rainwater infiltration.

- An appropriate seeding program will be undertaken (as agreed with the regulatory authority).
- Indigenous species compatible with the surrounding habitat will be used for re-vegetation.
- Storm water and drainage infrastructure associated with the storm water drainage channels and drains will be removed and disposed of
- Channels and drains will be shaped to smooth slopes and integrate into the natural drainage pattern.
- The transfer of roads to third parties for future use and maintenance will be considered.
- Access roads with no beneficial reuse potential will be removed by deep ripping, shaping and levelling after the removal and disposal of any culverts, drains, ditches and/or other infrastructure. Any removal process will restore the natural drainage pattern as far as possible.

There is potential for land to be contaminated by hydrocarbons, sewage or general wastes. Sites contaminated by operational activities will be identified, contained and managed during the operational phase. A contaminated land assessment will be conducted upon decommissioning and any hazardous materials or wastes will be removed for the site or remediated in accordance with Mozambican legislation and good industry practice.

### **F3.6**

#### ***SOCIOECONOMIC CONSIDERATIONS FOR DECOMMISSIONING***

Significant positive employment and economic benefits are expected as a result of the Project, including:

- Creation of significant direct and induced employment during the life of the LNG Facility.
- Stimulation of local business.
- Decreased social vulnerability and increased household income due to employment.
- Significant contribution of the Project to the Mozambican Gross Domestic Product (GDP) locally and nationally.

The closure of any major project can present socioeconomic challenges for the local community. For example, loss of direct or indirect local business and work opportunities due to end of the Project operations can lead to increased unemployment and secondary negative economic impacts. Therefore the Final DRP will consider the potential effects resulting from Project

decommissioning and identify measures to minimise these are far as practically and economically viable. For example, working closely with the local communities to reduce the negative impacts associated with employee termination during the operational phase by:

- Building community capacity to manage opportunities and impacts arising from the operational, decommissioning and post-decommissioning phases of the Project.
- Providing capacity building and training aimed at diversifying local skills beyond construction and operational activities.
- Providing training to build local skills tailored to Project decommissioning and post-decommissioning activities (equipment dismantling, rehabilitation activities, monitoring, etc). This will promote local communities (local labour) benefits from some employment opportunities created during decommissioning and post-decommissioning phases.
- Provide training to transfer Project-learned skills to alternative and secondary industries tailored to respond to market economy.

The Project will confirm that the Final DRP considers the potential future uses for the Project area and that these have been identified through discussions with the local authorities.

### *F3.7 POST-CLOSURE MONITORING, AUDITING AND REPORTING*

#### *F3.7.1 Post-Closure Monitoring*

Following decommissioning and rehabilitation activities, a suitable monitoring program will be developed and submitted to the relevant Ministry with the final DRP for approval.

The monitoring programme will include review of all decommissioning activities along with monitoring around vegetation growth, erosion and groundwater quality post closure. Monitoring of vegetation growth shall be undertaken at regular intervals with each area that has been re-vegetated. For the onshore rehabilitated areas, the monitoring programme will comprise mainly a photo register of the regeneration status of the vegetation at regular periods (but at least two seasons per year). The programme would allow the verification of the regeneration process and the implementation of alternative measures such as planting and use of mulch wherever deemed necessary.

Monitoring may include an assessment of the following:

- Species abundance and basal cover.
- An estimation of biomass yield.
- An index of plant species diversity within the rehabilitated plant community.

Rehabilitated areas will be inspected annually to identify:

- Occurrence of surface erosion.
- Vegetation die-back.
- Contamination (physical or chemical) of the soil surface and water bodies.
- Fertility status of rehabilitated land.
- The emergence of alien/exotic vegetation.

### ***F3.7.2 Reporting and Auditing***

Although reporting is not mandatory according to the Petroleum Law and Regulations or by the Environmental Regulations for Petroleum Operations, annual environmental reporting to MICOA and other relevant departments is proposed to continue for at least three years post- decommissioning.

In addition, in accordance with the Regulation for the Licensing of Petroleum Installations and Activities - Ministerial Diploma no. 272/2009 of 30 December, the National Institute of Petroleum shall audit the decommissioning activities until the rehabilitation is complete.

This DRP presents the likely activities to be undertaken by the Project for decommissioning, and rehabilitation of all the areas affected by the LNG Facility and associated onshore, near shore and offshore infrastructure. This DRP will be updated in conjunction with regulatory agencies at least two years prior to closure in accordance with Mozambican legislation. Decommissioning and Rehabilitation activities will not commence until a Decommissioning Licence is granted.

The updating process for the decommissioning and rehabilitation planning shall include the following activities:

- Review of current industry good practice on decommissioning
- Liaison with Mozambican regulators;
- Identification of key environmental, safety and socioeconomic concerns;
- Risk ranking of these concerns;
- Undertaking additional work to consider the feasibility of decommissioning and rehabilitation options if required;
- Identification of key stakeholders and engagement with them around the DRP; and
- Preparation of the Final DRP.

The process leading to approval of a DRP by the relevant Ministry should be transparent and subject to public consultation.