



commission for environmental impact assessment

Royal Netherlands Embassy
Attn. Mr. S.E. Ramondt
Ambassador
Lima
PERU

your reference
GW/SHELL/0037/98

your letter
January 12, 1998

our reference
U15-98\Sh\ep\031-86

subject
Advisory review of the environmental
impact statements of the hydrocarbon
appraisal and development in Camisea,
Peru

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Utrecht (The Netherlands),
29 May 1998

By letter dated 12 January 1998, the Commission for Environmental Impact Assessment (EIA) was requested to carry out an advisory review of two EIA-studies namely Camisea Appraisal Drilling Campaign of 1996 and Pagoreni/San Martin East Exploratory Wells of 1997, as well as a review of the scoping document for the three EIAs for the Full Field Development Programme of Shell in Peru on hydrocarbon appraisal and development. The EIA-studies were already approved by the competent Peruvian Authority, i.e. the Ministry of Energy and Mines.

I herewith submit the advice prepared by a working group of the Commission for EIA. The Commission would like to draw your special attention to the issues raised below.

Although the review was performed on the EIAs prepared by Shell for its activities related to hydrocarbon appraisal and development, the Commission has formulated this advice in such a way that it could serve as a model to be used by the Ministry of Energy and Mines for reviewing and approving EIAs of other companies engaged in exploration and exploitation activities of gas and oil in Peru.

The Commission appreciates the open heartedness encountered during the discussions it had with Shell and ERM in Lima. The Commission would also like to emphasise the efforts made by Shell and ERM to constantly improve the quality of the EIAs, including the Environmental Management Plans and the briefing papers. The critical remarks in this review advice must be considered as an intent to contribute to the effort of improving EIA quality.

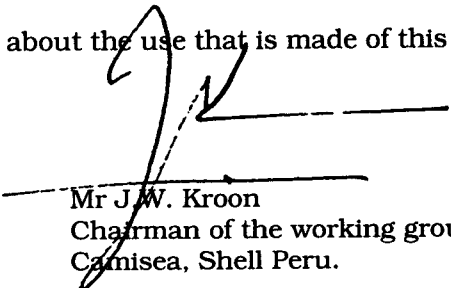
The Commission observes that the so called 'offshore policy' is meant to minimise the utmost possible adverse impacts on the living conditions and the cultural values of the local population. Nevertheless, the activities in the field will put in motion changes in these living conditions anyhow. Although Shell realises its position as a change agent, it is to be expected that Shell will adopt the role of a regional development agency, since governmental institutions are largely absent in the area. The development of the region however remains the responsibility of the Peruvian State. In this respect, the Commission recommends Shell to incorporate in the cooperation with the Peruvian State the preparation of a strategy for protection and development of the region and its population.

During the Workshop for stakeholders in Lima on March 11th 1998, the Commission has observed that some stakeholders inside Peru, especially indigenous groups, doubt if they themselves possess sufficient technical expertise to effectively review (also future) EIAs of oil and gas companies acting in or near areas traditionally used by them. These groups urged the Commission to develop a training programme on EIAs for NGOs and indigenous groups in Peru. The Commission discussed this matter during the debriefing session at the Netherlands Embassy in Lima. The suggestion was made to develop a similar training programme for national, regional and local authorities, in order to promote capacity building within the government. The Commission would very much welcome a training programme on EIA in Peru, and would be prepared to assist in its formulation and/or development. However, it should be noted that the Commission is not in the position to develop such a programme entirely on its own.

For training purposes the Commission has elaborated Appendices 5 and 7 which are (provisional) guidelines and review frameworks for EIAs for exploitation and exploration of gas and oil. These guidelines are also available on floppy and could be used as a generic list for other oil- and/or gas-related activities in Peru. In workshops with relevant stakeholders these lists could be explained, revised and finetuned according to the Peruvian reality. Comparable generic lists for other activities with major impact on the environment could be elaborated in the same way (e.g. mining activities). It is also possible for the working group to reconvene and review the three upcoming EIAs to be prepared by Shell. The review could be carried out jointly with relevant governmental authorities and/or stakeholders.

The Commission welcomes comments of the Peruvian authorities on this advice, because expected spin-off of the Commission's mission was to enhance EIA-understanding and to promote capacity-building in the field of EIA. Therefore the Commission would like to invite especially the Peruvian Ministry of Energy and Mines to provide her with feedback on this matter.

The Commission appreciates to be informed about the use that is made of this advice.



Mr J.W. Kroon
Chairman of the working group on
Camisea, Shell Peru.

c.c. Ministry of Energy and Mines in Peru,
to the attention of Mr Mogrovejo;
Shell Peru,
to the attention of Mr M Jones;
Netherlands Development Agency,
to the attention of Mrs A. Wevers.