



Offshore Petroleum Regulator
for Environment & Decommissioning

ES/2022/001

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15 February 2023

Department for Energy
Security & Net Zero

Offshore Petroleum Regulator for
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Dear [REDACTED]

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020**

NOTICE UNDER REGULATION 12(1)

ROSEBANK FIELD DEVELOPMENT

The Offshore Petroleum Regulator for Environment and Decommissioning (“OPRED”) acting on behalf of the Secretary of State for Energy Security & Net Zero (“the Secretary of State”) is currently considering the Environmental Statement (“ES”) and the representations received from the public consultation process in relation to the above project. Equinor UK Limited (“Equinor”) is hereby required to provide further information in relation to the following:

1. The further information provided on 23 December 2022 (“the further information”) in response to OPRED comment number 4, reviewed the conclusion presented in the ES as to the presence or absence of coral gardens. It is noted that the video and photographic data from the April 2022 survey was re-evaluated against the assessment criteria cited in ‘*Henry, L.A. & Roberts, J.M. 2014. Developing an interim technical definition for Coral Gardens specific for UK waters and its subsequent application to verify suspected records. JNCC Report No. 507.*

i) Based on the criteria detailed in this report, the further information concludes that coral garden taxa were not found to be dominant compared to other macrofaunal species identified during the survey. This appears to contradict information provided in the ES that states ‘...*the megafauna from depths greater than 690 m formed a distinct grouping in cluster analysis and was dominated by the soft coral *Gersemia* and sea spiders (*Pycnogonida*). Similar species can be observed from surveys conducted over ten years apart, including *Sabellid polychaetes*, soft corals, sponges, sea spiders, anemones and brittlestars.*’. Further, the assessment should be undertaken against other habitat forming species, rather than other macrofaunal species. Please clarify.

ii) When describing the abundance of non-reef forming coral taxon, the further information describes a re-interpretation of the April 2022 visual survey data and amendment of the survey results to change a score of 'frequent' on the SACFOR scale to a score of 'occasional' or 'rare'. Please explain how the number of *Gersemia* counted in the original interpretation of the visual survey data has changed, in particular when the comparative density areas identified in the SACFOR scale are an order of magnitude different.

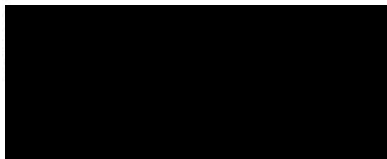
In addition, the density format provided in the further information (1-5 individuals per 25m²) does not align with the SACFOR density scale. Please provide data using the measurements in the SACFOR scale.

iii) Noting the change to the *Gersemia* data following re-evaluation of the April 2022 visual survey, please clarify what re-evaluation of the survey data has been undertaken for any other taxa assessed as part of that visual survey. In addition, please clarify if there has been any change to interpretation and analysis of any other information presented in the ES as a result of the re-evaluation of the visual surveys.

Your response will be reviewed, and consideration given as to whether the information provided ought to be made public because the information is directly relevant to reaching a conclusion on whether the project is likely to have a significant effect on the environment. If so, OPRED will notify Equinor UK Limited under Regulation 12(3), and Equinor UK Limited will have to take further steps to publish information and make provision for further public consultation under Regulations 12(5) to 12(9).

OPRED looks forward to receiving your response so that we can progress our consideration of the ES.

Yours sincerely



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The Offshore Petroleum Regulator for Environment and Decommissioning
For and on behalf of the Secretary of State for Energy Security & Net Zero

