

SHELL U.K. LIMITED SHELL CENTRE LONDON SE1 7NA

Registered No.: 00140141

Date: 17th August 2021

Department for Business, Energy & Industrial Strategy

AB1 Building Crimon Place Aberdeen AB10 1BJ

Tel Fax

www.gov.uk/beis bst@beis.gov.uk

Dear Sir / Madam

THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2020 GANNET UMBILICAL REPLACEMENT - PIPELINE PL912.1

A screening direction for the project detailed in your application, reference PL/2146/0 (Version 2), dated 13th August 2021 has been issued under regulation 6 of the above Regulations. The screening direction notice, and any relevant conditions and comments are attached. A copy of this screening direction will be forwarded to the application consultees, the Oil and Gas Authority and published on the gov.uk website.

If you have any queries in relation to this screening direction or the attachments, please do not hesitate to contact on or email the Environmental Management Team at bst@beis.gov.uk.

Yours faithfully



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

SCREENING DIRECTION CONFIRMING THAT AN ENVIRONMENTAL IMPACT ASSESSMENT IS NOT REQUIRED

GANNET UMBILICAL REPLACEMENT - PIPELINE PL912.1

PL/2146/0 (Version 2)

Whereas SHELL U.K. LIMITED has made an application dated 13th August 2021, under The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020, and whereas the Secretary of State has considered the application and is satisfied that the project is not likely to have a significant effect on the environment; in exercise of the powers available under regulation 6, the Secretary of State hereby directs that the application for consent in respect of the project need not be accompanied by an Environmental Impact Assessment, provided that the project is carried out as described in the application for the screening direction and in accordance with the conditions specified in the attached schedule.

In giving a screening direction under regulation 6 of the above Regulations, the Secretary of State accordingly gives his agreement to the Oil and Gas Authority to the grant of consent for the project as detailed in the application.

Effective Date: 17th August 2021



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

SCHEDULE OF SCREENING DIRECTION CONDITIONS

The grant of this screening direction is conditional upon the screening direction holder complying with the following conditions.

1 Screening direction validity

The screening direction shall be valid from 17 August 2021 until 31 December 2021.

2 Commencement and completion of the project

The holder of the screening direction must confirm the dates of commencement and completion of the project covered by the screening direction. Notification should be sent by email to the Environmental Management Team Mailbox: bst@beis.gov.uk

3 Nature of stabilisation or protection materials

Grout bags deposits

20 tonnes of grout contained within 25 kilogramme capacity biodegradable bags. (The number of bags deposited should be the minimum required to provide the necessary protection, and any surplus bags must be returned to land).

4 Location of pipeline and stabilisation or protection materials

As detailed in the application.

5 Prevention of pollution

The holder of the screening direction must ensure that appropriate measures are taken to minimise discharges, emissions and waste, in particular through the appropriate use of technology; and to ensure that necessary measures are taken to prevent incidents affecting the environment or, where they occur, to limit their consequences in relation to the environment.

6 Inspections

Should the Department consider it necessary or expedient for an inspector appointed by the Secretary of State to investigate whether the conditions of the screening direction are being complied with, the holder of the screening direction shall afford the inspector with such facilities and assistance as the inspector considers necessary to exercise the powers conferred by the regulations. The holder of the screening direction shall additionally ensure that copies (electronic or paper) of the screening



direction and any other relevant documents are available for inspection by the inspector at:

- a) the premises of the holder of the screening direction; and
- b) the facilities undertaking the project covered by the screening direction.

7 Check monitoring

Should the Department consider it necessary or expedient to undertake an independent monitoring programme to assess the impact of the project covered by the screening direction, the screening direction holder shall afford the Department with such facilities and assistance as the Department considers necessary to undertake the work.

8 Atmospheric emissions returns

Following completion of the project covered by the screening direction, the holder of the screening direction shall report all relevant atmospheric emissions, such as combustion emissions, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting forms.

9 Deposit returns

The holder of the screening direction shall submit a report to the Department following completion of the deposit covered by the screening direction, confirming the quantity of materials deposited and the estimated area of impact, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting form. Where no deposits are made, a 'nil' return is required.

10 Unauthorised deposits

Following completion of the project covered by the screening direction, the holder of the screening direction shall recover any materials accidentally or temporarily deposited on the seabed, such as debris, temporary containers, structures or deposits, or scientific instruments, and shall return the materials to land. If it is not possible to recover any of these deposits, full details of the materials remaining on the seabed must be reported to the Department in accordance with the requirements of Petroleum Operations Notice No.2 (PON2).

11 Screening direction variation

In the event that the holder of the screening direction proposes changes to any of the particulars detailed in the application for a screening direction, the holder must notify the Department immediately and submit an application for a post screening direction amendment. The post screening direction must be in place prior to the amended proposals taking effect.





COMMENTS ON THE APPLICATION FOR SCREENING DIRECTION

Section 1

The attention of screening direction holders is drawn to the following provisions regarding The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

- 1) You are deemed to have satisfied yourself that there are no barriers, legal or otherwise, to the carrying out of the project covered by the screening direction. The issue of a screening direction does not absolve the screening direction holder from obtaining such authorisations, consents etc that may be required under any other legislation.
- 2) The Department would draw your attention to the following comments:

No comment.

3) All communications relating to the screening direction should be addressed to:

Out-of-hours emergency screening direction variations:

Telephone Met Office out-of-hours service (0330 135 0010) and ask to be connected to the Department's On-call Response Officer (Offshore Environmental Inspectorate).

Routine communications

bst@beis.gov.uk

or

Offshore Petroleum Regulator for Environment & Decommissioning Department for Business, Energy & Industrial Strategy AB1 Building Crimon Place Aberdeen AB10 1BJ





SCHEDULE OF SCREENING DIRECTION DECISION REASONS

The Secretary of State has decided that, based on the information provided, the project is not likely to have a significant effect on the environment. The main reasons for this decision are:

1) Decision reasons

The following provides a summary of the assessments undertaken by OPRED to determine whether an Environmental Impact Assessment is required for this project, summarises the information considered, the potential impacts and sets out the main reasons for the decision made. In considering whether an Environmental Impact Assessment is required or not, the following have been taken into account:

- a) the information provided by the developer;
- b) the matters listed in Schedule 5 of The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Regulations 2020) (the Regulations);
- c) the results of any preliminary verifications or assessments of the effects on the environment of the project; and
- d) any conditions that the Secretary of State may attach to the agreement to the grant of consent.

Characteristics of the Project

Having regard, in particular, to the matters identified at paragraphs 1(a) to (g) of Schedule 5 to the Regulations, the characteristics of the project include the following:-

Summary of the Project

- Deposit of 20 tonnes of biodegradable grout bags for stabilisation of PL912;

Description of the Project

If an existing control umbilical pipeline is unserviceable, a replacement umbilical will be installed at the Gannet field - between the GB02 well and the Gannet A platform. The replacement of the umbilical will be set in place on the seabed and stabilised using up to 20 tonnes of biodegradable grout bags. The works are expected to take three days to complete by a dive support vessel and are planned to take place between August and December 2021.

No cumulative impacts are expected to occur with any other existing or approved projects. The risk of a major accidents and environmental effects from major accidents, such as a diesel spill and pipeline release has been assessed. The Developer has control measures in place to reduce the risk of a major accident occurring and the probability of such an event occurring is very low.



There is not likely to be any significant impact of the project on population and human health. It is not considered likely that the project will be affected by natural disasters. No pollution or nuisances are foreseen from the project.

Location of the Project

Having regard, in particular, to the matters identified at paragraphs 2(a) to (c) of Schedule 5 to the Regulations, the environmental sensitivity of geographical areas likely to be affected by the project has been considered as follows:-

The project is in an offshore oil and gas licenced area, approximately 164 km east from the Aberdeenshire coastline in Scotland and 82 km west of the UK/Norway median line, in an area where water depth is approximately 92-98 m and the seabed type is characterised as predominately comprising very fine to fine sand, with moderate proportions of fine material (silt and clay). Water circulation in the project location is anticlockwise. It is driven by the influx of Atlantic waters through the Fair Isle Channel moving southward along the Scottish and English coasts, with offshoot currents travelling east across the North Sea and a northward outflow through the Norwegian Trough. Within the region, there is an annual mean significant wave height between 2.11-2.40 m. The project is located within the East of Gannet and Montrose Fields (EoGMF) marine conservation area, designated for offshore deep sea muds, and the species ocean quahog.

The main biotope complex identified within the Gannet fields is 'Circalittoral muddy sand' which supports fauna-dominated communities characterised by polychaetes and echinoderms. The 2019 Gannet B survey also identified a potential area of Methane Derived Authigenic Carbonate (MDAC), classified as 'Seeps and vents in sublittoral sediments'. Habitat assessments using data gathered during the 2013 and 2019 Gannet surveys were carried out to determine the presence and extent of habitat types, as well as to identify any sensitive habitats occurring in the Gannet fields. From the site specific surveys of the project location, there is no evidence of offshore deep sea muds. It is not thought likely that the 'Seapens and burrowing megafauna in circalittoral fine mud' component biotope of the 'Burrowed mud' feature occurs within the project area either, after analysis of survey data. The conservation area is designated for the infaunal venerid bivalve ocean guahog which inhabits sandy and muddy sediments from the low intertidal zone to 400 m. Juvenile ocean quahog were reported at all stations sampled during the Gannet A to Gannet D survey at densities estimated to be 'common' or 'abundant'. Adults were recorded in one grab sample (from a 2019 survey) and were estimated as 'common'. The species (mainly juveniles) was also found in low abundances across the greater Gannet field survey area.

The project works will not take place during peak spawning of any fish or shellfish species. Sightings of cetaceans have been recorded during the period for which the project works are planned, and more frequently during the summer months. Seabird density is described as very high for the summer period when project works are planned but low during the autumn periods. The project area is not within a



commonly fished ground, and the area is described as a low intensity fishing area. There is a large amount of other oil and gas infrastructure in the surrounding area (less than 4km) and shipping traffic is very low. The project location is not in proximity to an aggregate extraction site or an offshore renewables site. There are no military exercise areas or other cables or wrecks in proximity to the project location.

Given the location of the project, the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) and (viii) of Schedule 5 are not likely to be affected by the project.

Type and characteristics of the potential impact

In accordance with paragraph 3 of Schedule 5 to the Regulations, the likely significant effects of the project on the environment have been considered. Potential effects to the environment from the activities associated with the change to the project were assessed, with particular focus on the predominant impacts resulting from atmospheric emissions from vessel use, and seabed disturbance from deposits on the seabed.

Emissions to air are possible from combustion plant used temporarily on dive support vessel. The quantity of carbon dioxide equivalent from the vessel use amounts to 0.0005% of the 2018 total emissions from offshore oil and gas activity. Significant environmental effects on climate or local air quality are not expected from the project.

The area of temporary permanent disturbance resulting from deposits of biodegradable grout bags is minimal. The main receptor impacted by seabed disturbance will be the benthic communities. Physical disturbance can cause mortality or displacement of benthic species in the impacted zone. It remains possible that individuals of A. islandica may be directly impacted by seabed disturbance as a result of the deposit of grout bags, potentially resulting in smothering by sediment. It is not considered that the impacts from smothering by sediment on a small number of juvenile individuals of this species will result in a significant effect on the population viability of this species. Benthic species and habitats are expected to begin recovering following completion of the operations. Given the relatively small area which will be affected, the wide spread distribution, and relatively high reproductive rates of the species within the area, the impact to benthic species and habitats is considered to be very low and not significant. A 2019 environmental survey found the most predominant biotope complex was 'circalittoral muddy sand' in the Gannet survey area. This habitat has a silt content ranging from 5% to 20 %, therefore, sandeels may be present within the area. Given the following, the expected impact to fish spawning is considered to be insignificant:

- The temporary nature of the subsea installation activities;
- The relatively small area potentially impacted by the operations when compared to the suitable areas of seabed available for spawning and nursery grounds in the Central North Sea: and
- The relatively short life span (a few years) and high reproduction rates of the spawning species associated with the area.



In order to mitigate the effects of seabed disturbance, the developer will optimise the deployment of stabilisation materials by concentrating on the areas necessary to ensure protection of the new infrastructure and minimise any excess use. Given the relatively small area potentially impacted by the operations when compared to the suitable areas of Central North Sea seabed available and the high reproduction rates of the species associated with the area - the expected environmental impact of seabed disturbance is considered to be insignificant.

There are no expected transboundary impacts as a result of the project.

Decision

Taking the above considerations into account, the Secretary of State has concluded that the project is not likely to have a significant impact on the environment and that an environmental impact assessment is not required.

2) Mitigation of significant effects

The following are features of the project or measures envisaged that the developer has proposed to avoid or prevent what might otherwise have been significant adverse effects on the environment:

Not applicable.