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Offshore Petroleum Regulator
for Environment & Decommissioning

CNR INTERNATIONAL (U.K.) LIMITED
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Registered No.: 00813187

Date: 31st August 2021

Department for Business, Energy
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Dear Sir / Madam

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

**Pipeline flushing between Toni PPSM and Tiffany Platform and associated
protection deposits - PIPELINE PL904 and PL905**

I refer to your amended application dated 31st August 2021, reference PL/2149/1 (Version 1).

It has been determined that the proposed changes to the project is not likely to result in a significant effect on the environment, and therefore an environmental impact assessment is not required.

A screening direction is therefore issued for the changes to the project. An amended schedule of conditions, comments, and main reasons for the decision on the amended application, 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 [REDACTED] on [REDACTED] 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**

**Pipeline flushing between Toni PPSM and Tiffany Platform and associated
protection deposits - PIPELINE PL904 and PL905**

PL/2149/1 (Version 1)

Whereas CNR INTERNATIONAL (U.K.) LIMITED has made an application dated 31st 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: 31st 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 22 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

PL904

Grout bags deposits

3 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).

Concrete mattress deposits

5 existing concrete mattresses to be reused if possible, each measuring 6 metres x 3 metres x 0.15 metres.

5 concrete mattresses, each measuring 6 metres x 3 metres x 0.15 metres.

(The number of mattresses deposited should be the minimum required to provide the necessary protection, and any surplus mattresses must be returned to land).

PL905

Grout bags deposits

3 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).



Concrete mattress deposits

5 existing concrete mattresses to be re-used if possible, each measuring 6 metres x 3 metres x 0.15 metres.

5 concrete mattresses, each measuring 6 metres x 3 metres x 0.15 metres.

(The number of mattresses deposited should be the minimum required to provide the necessary protection, and any surplus mattresses must be returned to land).

4 Location of pipeline and stabilisation or protection materials

Within an area bounded by the coordinates 58 degrees 26 minutes 0.310 seconds North 01 degrees 17 minutes 10.416 seconds East and 58 degrees 28 minutes 42.203 seconds North 01 degrees 15 minutes 59.580 seconds East

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 Monitoring

The results of any pre or post-placement surveys carried out to confirm the necessity for the deposits covered by the screening direction and/or to confirm the accurate positioning of the stabilisation or protection materials, should be forwarded to the Department following completion of the surveys

8 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.

9 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.

10 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.

11 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).

12 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.

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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:

The Department has no comments.

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

Tel [REDACTED]
Fax



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

This provides a summary of the assessments undertaken by OPRED (Offshore Petroleum Regulator for Environment and Decommissioning) to determine whether an Environmental Impact Assessment is required for this project. It 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 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 in Schedule 5 1(a) to (g) of the Regulations, the characteristics of the project include the following:

Summary of project

Two 8" flexible flowlines (PL904 and PL905) each approximately 5.26 km in length run between the Toni Production Protective Structure and Manifold (PPSM) and Tiffany platform. The two flowlines will be flushed of hydrocarbons and the ends at the Toni PPSM will be disconnected, blinded off and wet-stored on the seabed until decommissioning.

Description of project

The two 8" production flexible flowlines PL904 and PL905 currently run between the Toni PPSM and Tiffany platform, both of which currently contain reservoir hydrocarbons. It is not possible to achieve a double isolation of the flowlines and it is



therefore the intention to flush both flowlines and disconnect them at the Toni PPSM only. The disconnected ends will be laid on the seabed within the 500 m exclusion zone where they will remain until decommissioning. The flowline contents post-flushing and disconnection will be flushing fluid comprising inhibited seawater.

Up to five existing concrete mattresses will be removed from each flowline, uncovering a length of up to 30 m of each flowline from the Toni PPSM. The mattresses will be laid on the seabed close to the PPSM, inside the 500 m exclusion zone.

Following disconnection of PL904 and PL905 the ends of the two flowlines will be re-positioned on the seabed to leave space around the Toni PPSM. The ends of the flowlines will be supported on grout bags. The newly positioned flowlines will be re-covered with concrete mattresses. Should it not be possible to use the existing concrete mattresses that were previously removed new mattresses of the same dimension will be used and old mattresses left on the seabed until decommissioning.

Following successful disconnection PL904 and PL905 will be entered into the interim Pipeline Regime (IPR).

The operations will be performed from the Deep Discoverer dive support vessel (DSV) and from the Tiffany platform. The anticipated start date is 22nd August 2021. Operations are expected to take up to 5 days to complete. This application includes deposits outlined in OGA consent PA/3609.

The risk of an unplanned diesel release from the vessels involved with the operations has been assessed. The developer has control measures in place to reduce the risk of an unplanned release occurring and the probability of such an event occurring is very low.

No cumulative impacts are expected to occur with any other existing or approved projects.

It is not considered to be likely that the project will be affected by natural disasters or unplanned major accident scenarios and there is no risk to human health. Other than the matters considered further below, there is not likely to be any significant impact of the project on population and human health.

Location of the project

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

The pipeline project area is located in Block 16/17a in the Central North Sea (CNS) in an approximate water depth ranging between 126 metres (m) at Toni and 130 at Tiffany, approximately 205 km northeast of the Scottish mainland (Rattrey Head) and 12 km west of the UK/Norway median line. The project area is not located within any



protected areas. The closest SAC to the Toni field is the Scanner Pockmark SAC located 23 km to the southwest of the Toni PPSM. The Norwegian Boundary and Sediment Plain Nature Conservation Marine Protected Area (NC MPA) is located 35 km to the southeast.

The project is in an area characterised by offshore circalittoral fine mud with sediments comprised of mud and sandy mud. The quantitative assessment of seabed sampling and imagery obtained from the most recent surveys indicate that the species abundance and diversity were typical of this area of the CNS. Seabed features such as depressions (or pockmarks) and trawl/anchor scars were identified at Thelma. Pockmarks are a widespread feature in muddy sediments in the central North Sea. Photographs obtained in the vicinity of the pockmarks indicated that none of these showed any evidence of hard carbonate concretions. The Toni and Tiffany fields are located in an area where habitat is classified as 'burrowed mud'. Seabed mounds and burrows were observed from ROV images of the seabed which are consistent with the occasional occurrence of slender seapen *Virgularia mirabilis*. The biotope '*Paramphinome jeffreysii*, *Thyasira* spp. and *Amphiura filiformis*' are also present within the vicinity of the Toni and Tiffany fields. Inspection of side scan sonar data and ground-truthing with visual camera systems indicated that there are no Annex I habitat within the area.

The fishing effort in the area (ICES (International Council for the Exploration of the Sea) 45F1) is rated low. Fish spawning and nursery activity will occur in the area, which may coincide with the operations. However, the area is considered unsuitable for herring spawning, any work being carried out is unlikely to occur during sandeel spawning due to weather and spawning intensity for sandeels in the area and impacts are limited to a pipeline corridor.

Killer whale, Minke whale, Atlantic white-beaked dolphin, harbour porpoise and Atlantic white-sided dolphin and White-beaked dolphin have been recorded in the vicinity. Densities of these species range from high to low throughout the year. Harbour seal and the grey seal may be encountered within the vicinity, but it is not likely that they use the area with any regularity or in great numbers.

Seabird vulnerability in Block 16/17a is medium during April and May and low for the remaining months of the year. Shipping density in the area is low. Fishing activity takes place in the areas surrounding the operational area, however, most traffic is generated by vessels trading between ports at either side of the North Sea and the Baltic. The project location is within the East Offshore Marine Plan area, There are no military restrictions on Block 16/17a, the TAMPNET 3 cable is located approximately 22 km northeast of the Toni manifold. There is one known non-dangerous wreck in the vicinity of the Toni PPSM. No aggregate dredging takes place within the block.

Given the location of the project, it is not likely that the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) or (viii) of Schedule 5 to the Regulations will 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 on the environment from the activities associated with the project were assessed, including impacts arising from atmospheric emissions, seabed disturbance, physical presence of a vessel on location, seabed disturbance, planned discharges and accidental spills.

Other than the matters considered further below, there is not likely to be any significant impact of the project on population and human health.

The physical presence of the single vessel involved will not have an exclusion area, however, the vessel will be subject to navigational provisions and able to move away in an emergency. The project is in a low-level fishing area and so the impact to other users of the sea is not expected to be significant. Noise and atmospheric emissions impacts are not considered to be significant.

The worst-case seabed footprint from the proposed operations is 0.00036 km². The placement of the deposits on the seabed will result in direct physical impact to benthic habitats and species within the immediate footprint of the operation. The seabed is inhabited by numerous organisms, including sessile species and animals that are unable to move rapidly or over large distances. The area of seabed directly affected is very small and represents a minute fraction of the similar habitat available in this region of the North Sea and therefore the impacts are not considered to be significant.

Block 16/17a has moderate shipping density and there are no navigational concerns, and no objections were received from the navigational consultees for any of the work proposed.

Power generation by the vessels result in the emission of gases to the atmosphere, however, it is expected that the emissions will be rapidly dispersed and are not likely to have a significant impact.

The cetacean density for Killer whale, Minke whale, Atlantic white-beaked dolphin, harbour porpoise and Atlantic white-sided dolphin and White-beaked dolphin (Annex II species) ranges from low to high, the latter relating to Minke whale and White-beaked dolphin densities in July and June respectively. Remaining densities are low to medium densities throughout the year. The proposed operations are unlikely to have a significant impact on these species. Due to the distance of the operational area from shore, harbour seals and grey seals (Annex II species), are not likely to be encountered regularly at the operational area. Any noise generated during operations is expected to be within local background levels.

The seabed sediment is very fine sand or coarse silt, and the benthos is representative of the wider area. Seabed habitat is consistent with the Scottish PMF 'Burrowed Mud' which is widespread in the area. Ocean quahog have been recorded in low numbers, however, there is no evidence of any potential Annex I Habitats have



in the vicinity.

Chemicals associated with pipeline flushing were assessed as posing no risk to the marine environment. There are no expected transboundary effects from the operations due to the localised and temporary nature of the disturbance and the 12 km distance from the UK/Norway Median Line. It is not considered likely that any planned operational discharge will be detectable at this distance from the project location.

Although not a planned activity, an unplanned release of diesel from a vessel was assessed. The developer has mitigation and control measures in place to prevent this. The proposed operations carried out as planned are not likely to have a significant effect on the environment and the probability of an unplanned release from the proposed operations is low.

There are no planned construction operations, no aggregate dredging, military practice sites, sites of marine archaeological interests or aquaculture sites within the vicinity of the proposed operations.

It is considered that the completion of work to flush the two 8" flexible flowlines (PL904 and PL905) each approximately 5.26 km in length running between the Toni Production Protective Structure and Manifold (PPSM) and Tiffany platform is not likely to have a significant impact. There will be no impact cumulatively with other activities or other users of the sea and no cumulative impacts are expected to occur.

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