

Our Ref: 01.01.01.01-5340U  
UKOP Doc Ref:1237291



Offshore Petroleum Regulator  
for Environment & Decommissioning

TAQA BRATANI LIMITED  
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LONDON  
EC4N 6AF

Registered No.: 05975475

Date: 15th November 2022

Department for Business, Energy  
& Industrial Strategy

AB1 Building  
Crimon Place  
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[bst@beis.gov.uk](mailto:bst@beis.gov.uk)

Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING  
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS  
2020  
PIPELINE PL4**

A screening direction for the project detailed in your application, reference PL/2314/0 (Version 3), dated 15th November 2022 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 [REDACTED] on [REDACTED] or email the Environmental Management Team at [bst@beis.gov.uk](mailto: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 PL4**

**PL/2314/0 (Version 3)**

Whereas TAQA BRATANI LIMITED has made an application dated 15th November 2022, 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 agreement to the Oil and Gas Authority to the grant of consent for the project as detailed in the application, PA/4273.

Effective Date: 15th November 2022



## **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 16 November 2022 until 31 December 2022.

#### **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](mailto:bst@beis.gov.uk)

#### **3 Nature of stabilisation or protection materials**

Rock bags deposits

152 tonnes of grout contained within 48 polyester bags (of either 4 tonne or 2 tonne capacity). (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**

Within an area bounded by the coordinates as noted 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 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:

When the vessel is within the East Mainland Coast Shetland SPA (Special Protection Area), it must follow the principles of the Scottish Marine Wildlife Watching Code (SMWWC). In this way any potential for disturbance will be minimised. The Code is available from <https://www.nature.scot/doc/scottish-marine-wildlife-watching-code-smwwc>.

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

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 [REDACTED]



## **SCHEDULE OF SCREENING DIRECTION DECISION REASONS**

Brent Pipeline (PL4) Span Remediation, TAQA Bratani Limited (herein after referred to as 'TAQA')

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 (Offshore Petroleum Regulator for Environment and Decommissioning) 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 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 the Project**

TAQA requests to lay 152 tonnes in 48 polyester bags to remediate spans which have developed along the Brent pipeline (PL4) in inshore waters off the Sullom Voe Terminal in Shetland. Bags will be deployed by crane from a vessel and will be manoeuvred into position underneath the pipeline to ensure support. The works are due to commence at the earliest 16th November 2022.

### **Description of the Project**

Recent scouring has been observed under the Brent System Pipeline (BSP), where several spans exceed the maximum safe length have developed. There is also concern that smaller spans may merge and develop into un-safe lengths. Four spans of concern have formed along the BSP in Block 207/20, located off the Firths Voe. TAQA plan to rectify these by the deployment of rock bags to decrease the length of





the spans below the safe threshold and to reinforce the pipeline touchdown to prevent the formation of much larger spans in the future. In total 48 rock bags will be deployed at seven locations, with the closest location being circa 4.5 km from land.

The rock bags will be deployed from an offshore support vessel, the Deep Vision. Bags will be lowered using an onboard crane and an ROV will move them into position. This approach means that the rock bags can be safely deployed without damaging the pipeline such that it is not proposed to shut-in the line during the proposed activities. The TAQA System Operator provides 24-hour watchkeeping of all PL4 pipeline activities, monitoring pipeline pressures and flow of hydrocarbons to Sullom Voe. The vessel will steam from Lerwick to the worksite travelling about 10-12 knots and will remain on station under dynamic positioning (DP) when laying the rock bags. Travel between deposit locations will be in DP at 3 knots.

The NSTA pipeline works authorisation by TAQA requests to lay 152 tonnes in 48 polyester bags. A maximum of 152 tonnes is required to stabilise the pipeline (Brent PL4), with works to commence at the earliest 16th November 2022. Activities are expected to take 1.5 days and be completed by December 2022.

The proposed span remediation of PL4 has not been included in any previous ES or screening direction.

### **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 BSP is operated by TAQA and is located in the northern North Sea, east of the Shetland Islands. It is a 36" pipeline which transports crude oil from the offshore Cormorant Alpha platform to the Sullom Voe Terminal on Shetland. The BSP is a 153km surface-laid pipeline. Four spans of concern have formed along the BSP in Block 207/20, located just off the Firths Voe and are located between 7 and 9km from landfall of the pipeline. However, the nearest shoreline is 4.5 km away to the south of the works area. Operations will place in water depths between c.57 - 70m.

The project area is located within the East Mainland Coast Shetland SPA (Special Protection Area), designated for habitats supporting great northern diver, red-throated diver and the Slavonian grebe. There are several other conservation areas in the vicinity. Other SPAs within 40km which protect bird assemblages are Felter (9km), Otterswick & Graveland (7km), Bluemull & Colgave Sounds (13km), Ronas Hill- North Roe & Tingon (17km), Ramna Stacks & Gruney (24km), Hermaness- Saxa Vord & Valla Field (29km), Noss (32km) and Papa Stour (34km). There is one Nature Conservation MPA within 40 km of the proposed operations, Feltar to Haroldswick, which is 10km north of the site. The Special Areas of Conservation (SACs) within 40km of the proposed operations are Yell Sound Coast (1.5 km- which is designated for its otter population and harbour (common) seals), Sullom Voe (7.4km), Hascosay (16km), The Vadills (27km), Pobie Bank Reef (30km)



and Papa Stour (33km).

The project is within the Scottish National Marine Plan area.

The mean neap and spring peak tidal flows in the area range from 0.02 m/s to 0.3 m/s. The mean annual wind-speed in Block 207/20 is 8.9 m/s. Prevailing winds are from south, southwest and west. The annual mean significant wave height varies between 0.7m - 1.0 m with a mean spring tidal range about 1.85m. The mean wind-speed is 8.9m/s.

The seabed of the area is characterised by coarse and rocky sediments, being made up of circalittoral and offshore circalittoral coarse sediment, and circalittoral and offshore circalittoral rock and biogenic reef. As such, the area is dominated by epifaunal habitats and species, including brittle stars, Sponges (Dead Man's fingers), common sun star, Sand star, Sea anemones, european edible sea urchin and edible crab.

The area is encompassed by nursery grounds for common skate, ling, saithe, spotted ray and spurdog and offers both a nursery and juvenile area for anglerfish, blue whiting, cod, European hake, haddock herring, lemon sole, mackerel, Norway pout, plaice and whiting. The block is known to be particularly important as a high intensity nursery for Anglerfish and Blue Whiting.

Anglerfish, blue whiting, cod, herring, ling, mackerel, Norway pout, sandeel, saithe and whiting are also listed as PMFs.

The area is located in Block 207/20 which lies within the International Council for the Exploration of the Sea (ICES) Rectangle 49E8. Fish typically found spawning in this ICES block during the proposed period of operations include Sandeel and Plaice. However, given the coarse and rock nature of the specific area, this particular location is considered unsuitable habitat. Fish landed from this ICES block was predominantly of pelagic species, with average annual landings of 21,485 tonnes from all fishing. The area is seen to be fished roughly at the same intensity as the surrounding blocks around Shetland which is relatively moderate, representing 1.3% (mean) of UK landings.

Three species of cetacean are known to be regular visitors to the licence block, being minke whale, white-beaked dolphin and harbour porpoise and in low to moderate densities. However, it is unlikely that minke whale will be present in the area given that the location is shallow and enclosed. Grey seals would be expected to have an average abundance in the area with harbour seals expected to occur at a higher abundance. Both grey and harbour seals are considered Priority Marine Features (PMFs) in Scottish waters. All cetacean and pinniped species are species of national importance (previously European protected species).

Seabirds identified in Block 207/20 include the following species of winter importance; Atlantic puffin, black-legged kittiwake, common guillemot, European shag, glaucous gull, great black-backed gull, great skua, herring gull, little auk,



northern fulmar, northern gannet and razorbill. The European storm petrel is noted for its breeding importance in this block. The sensitivity of birds to surface oil pollution in the Block 207/20 is generally High or above for the majority of the year, but drops to Medium and Low in July, September, and October. In the period of operations (November and December) the sensitivity of seabirds is High.

The proposed operations are in an area that experiences moderate shipping, with an average weekly vessel density of between 10 and 25. There are two wrecks in the local vicinity, with the nearest being 2 km north-west of the operations. Block 207/20 is not licenced for any oil and gas activities. There are no aggregate extraction activities specifically within the area where rock bags will be laid. The closest area of military activities to the location of proposed activities is 125 km to the southwest, while the closest power cable is located 4.5 km to the west. There are no windfarm lease sites or INTOG (Innovation and Targeted Oil and gas) sites in proximity to the activities with the closest planned windfarm being 33km to the south-east. There are a number of shellfish protection waters and aquaculture sites (both fish, fisheries and shellfish) within 10km of the proposed operations but none overlap with the workscope.

Previous works along the line include placement of 100 concrete saddles between roughly 5-7km from shore to help maintain its position. In addition, 10 concrete blocks were laid on the line (within the Yell Sound) in 1976.

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 on the environment from the activities associated with the project were assessed, including impacts arising from atmospheric emissions, seabed disturbance, physical presence, 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.

Limited atmospheric emissions of 68 tonnes of CO<sub>2</sub>(e) will result from the power generation from the deployment vessel. Assessment indicates that the project will generate a negligible proportion of shipping and UKCS oil and gas emissions which will rapidly disperse. Vessel emissions will be minimised by optimising deployment, compliance with MARPOL emissions standards and other shipping requirements with no likely significant effect on air quality. Whilst it is recognised that atmospheric emissions contribute to climate change, TAQA considers energy efficiency and emissions during selection and management of contractors and is maximising efficient use of a vessel that is already contracted for other work scopes in the area which has thereby minimised this contribution as far as possible.

The vessel will work on site for a maximum of 1.5 days. Given the very short duration



of this scope, no negative impacts on access to other sea users is anticipated. TAQA have consulted with the Scottish Fishermen's Federation (SFF) on the proposed activities and they responded noting that the use of rock bags to remediate the spans at these locations is not expected to be a concern to the fishing industry. Indeed, the rectification of spans is a safety measure to reduce occurrences of snagging from any benthic fishing gear. The operator will be required to communicate with vessels and notify activities to keep other users informed as per standard shipping regulations. There are therefore no significant navigational concerns.

The vessel will be MARPOL compliant such that any discharges are not considered to have a significant impact on water quality in the area. Water quality will not be affected so there will be no impact on nearby shellfish protection waters or aquaculture sites.

Seabed impacts are expected to be localised in nature with the deposit of rock bags impacting a potential area of 167.88m<sup>2</sup> of seabed habitat supporting organisms such as individual star fish, sea urchins and other epifaunal crustaceans. Given the coarse nature of the sediment, it is unlikely that turbidity would be affected. Depositing the rock bags will result in a negligible loss of the general seabed habitat and species limited to the footprint of the deposit, which is in close proximity to and under the existing pipeline. The rock bags are polyester to ensure integrity and positioning is maintained once laid under the pipeline spans. The impact of the bags is highly localised and therefore not considered significant, given the wider extent of these habitats and species in the area. The bags will be added to the subsea Materials Inventory which will be considered, as per regulations in force at the decommissioning phase. Such materials will be considered in the waste management plan, including methods for retrieving subsea infrastructure and stabilisation features and onshore disposal routes.

Spawning is not considered to be impacted by virtue of the only species spawning during the proposed operational window is plaice and sandeel, neither of which are expected to be significant spawners in this area given the hard substrate. The highly localised nature of impacts will not conceivably impact spawning activities.

Vessel movements in themselves are not known to disturb cetacean and/or pinniped individuals. Marine mammals are at negligible risk of interaction with any noisy activities given that there will be placement of rock bags rather than the use of a rock-fall pipe. It should be noted that the operations occur in the vicinity of a SAC designated for the protection of Otters and Harbour seals (<1.5km). However, vessel speed, duration and mode of operation in the area means that marine mammals are not at risk from impacts from the vessel or its propulsion. Impacts on marine mammals, are therefore not considered to be significant.

TAQA reports spans twice yearly and as such, FishSAFE has previously been advised of the location of these spans. TAQA reports to have consulted with the Scottish Fishermen's Federation on the proposed activities and the response indicates no concern to the fishing industry. Fishing is deemed moderate in the area, but the absence of concern from the industry themselves and in conjunction with the



short deployment period, the proposed operations are unlikely to negatively impact fishing activities in the area.

The rock bags will be deployed from an offshore support vessel by crane and manoeuvred into position by ROV. This means bags will be safely deployed without damaging the pipeline and as such, is not proposed to shut-in the line during the proposed activities. The TAQA System Operator provides 24-hour watchkeeping of all PL4 pipeline activities, monitoring pipeline pressures and flow of hydrocarbons to Sullom Voe, which provides adequate mitigation.

Although not a planned activity, an unplanned release of hydrocarbons was considered, including the potential for operations to rupture the pipeline. The pipeline conveys oil but given the deployment approach and TAQA system Operator monitoring, there is adequate risk management to negate the probability of an oil spill from the pipeline rupture. Therefore the only risk of an oil spill is considered to be from the deployment vessel itself, which is subject to a Shipboard Oil Pollution Emergency Plan and relevant operating procedures, with the vessel subject to audits, inspections and regular maintenance. The proposed operations carried out as planned are not likely to have a significant effect on the environment and the probability of a significant release from the proposed operations is very low.

Impacts were considered specifically for the protected sites, Yell Sound Coast SAC and the East Mainland Coast Shetland SPA, which are the only sites close enough with potential to be impacted. Likely significant effects were considered on both sites from the proposed operations and it was determined that, the proposed operations, alone or in combination with other plans or projects will not have a significant effect on these sites. Although not deemed significant, it was considered that the vessel, as best practise, should follow the Scottish Marine Wildlife Watching Code SMWWC when travelling through the East Mainland Coast Shetland SPA, to minimise the potential disturbance to the Red Throated Diver bird population. All other sites were considered not to have any possible interaction with the proposed operations. When the vessel is within the East Mainland Coast Shetland SPA (Special Protection Area), it must follow the principles of the Scottish Marine Wildlife Watching Code (SMWWC). In this way any potential for disturbance will be minimised. The Code is available from <https://www.nature.scot/doc/scottish-marine-wildlife-watching-code-smwwc>.

The proposal aligns with the policies in the National Marine Plan.

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.

No objections were received from the consultees for the proposed operations. It is considered that the proposed operations to protect the Brent PL4 with 152 tonnes of rock in polyester bags is not likely to have a significant impact. There will be no impact cumulatively with other activities or other users of the sea and so 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:

N/A