



# Guidance on decommissioning debris surveys and recovery and seabed clearance verification

## 1.1 Debris surveys and recovery

Prior to any decommissioning operations, seabed surveys should be undertaken to identify any materials or obstructions that may be a potential hazard and need to be removed. If it is suspected that some materials are buried, then the surveys should also be designed to locate the materials and identify the depth of burial. The survey results should then guide the decision about what should be removed and what can be left in place, and where relevant, guide the choice of removal options.

With respect to some marine protected areas, the preference for debris removal is the use of a Remotely Operated Vehicle (ROV), guided by the results of the geophysical surveys. OPRED accepts however that there may be instances where the location, nature and quantity of debris dictate alternative requirements and, in some circumstances, more than one method in an area. Other methods used for debris removal may include:

- **Drag.Net** – a strongly constructed net specially adapted to recover light seabed debris.
- **Rockhopper/Hopper trawl** - is designed to 'bounce' easily over rough ground minimising seabed impact.
- **Chain mats** – for clarity, not used for debris removal. Primarily used for seabed rectification work following pipe or cable lay operations for issues relating to backfill or where clay berms present snagging hazards.
- **Other fishing gear**

### 1.1.1. Debris recovery in safety zone areas

For areas within a relinquished safety zone where there may be extensive debris, and/or extensive seabed disturbance resulting from the decommissioning operations, it may be appropriate to undertake debris clearance trawl operations to remove debris and obstructions and not just to demonstrate over-trawl-ability. Discussions regarding the most appropriate method(s) to remove the debris and obstructions should be discussed with the relevant national fishing federation.

Removal or remedial works using ROVs or similar may also be appropriate for areas with extensive debris. An ROV may be more appropriate if there are large items that could not be removed during trawl debris removal operations, or where sensitive

seabed features or organisms have been identified that could be adversely impacted by trawl debris removal operations, e.g., protected sandbanks or biogenic reefs. If there are concerns in relation to the safety of fishing vessels and risk to life post-decommissioning, then the most appropriate method(s) should be discussed with the relevant national fishing federation. An operator must demonstrate to the satisfaction of the regulator that the proposed use of debris removal using trawl gear methods will not have a significant impact on protected habitats and features through the Marine Licence application process.

For areas within a safety zone (that will be relinquished following decommissioning works) where there is not extensive debris and/or extensive seabed disturbance, and/or where the seabed is particularly sensitive, we consider debris recovery using trawl debris removal operations to be unnecessary and/or undesirable. Under such circumstances we would advise the use of less intrusive alternative methods, such as ROV.

### **1.1.2. Debris recovery outside safety zones, including pipeline routes.**

For areas outside a safety zone, any necessary debris recovery should normally be undertaken using an ROV. In many cases, operators will already hold geophysical or visual survey data for areas such as pipeline routes, and any necessary additional surveys and ROV recovery operations can be targeted to reduce the workload. Debris recovery using trawl debris removal operations should only be required to supplement ROV recovery in exceptional circumstances and therefore other debris recovery methods must be considered other than over trawl methods.

## **1.2 Seabed clearance verification**

Current decommissioning practice is for the operator to commission a seabed clearance survey using over trawl methods to obtain post-decommissioning verification that the relevant area has been successfully cleared to allow normal fishing to resume safely.

Seabed clearance verification surveys using over trawl methods should normally only be required and undertaken if the area has not been open to fishing during the operational phase, and there is evidence that infrastructure, debris, or any other obstructions could remain on the seabed and could possibly interfere with future fishing operations or where recent seabed disturbance has taken place as a result of decommissioning related works.

Seabed clearance verification surveys using over trawl methods should be avoided in marine protected areas where it has been identified that there are sensitive seabed features or organisms that could be adversely impacted, e.g., biogenic reefs, and may be unlawful in other conservation areas where a byelaw has been introduced to

prohibit the use of certain types of fishing gear. An exception to this is where an operator can demonstrate to the satisfaction of the regulator that the proposed use of over trawl methods will not have a significant impact on protected habitats and features through the Marine Licence application process.

It is the responsibility of the operator to demonstrate that there is no evidence that infrastructure, debris, or any other obstructions remain on the seabed and that there is unlikely to be interference with future fishing operations. Seabed clearance verification reports (obtained using over trawl methods and/or the geophysical survey / ROV removal) will be reviewed by the regulator when the close out report is submitted, and the regulator will determine whether further work is required. Consultation with the national fishing federation may also be appropriate. If there is subsequent interference with fishing operations resulting from oil and gas debris or other obstructions relating to the decommissioning operations, they will be dealt with under existing liability agreements.

### **1.2.1 Safety zone areas**

For areas within a safety zone (that will be relinquished following decommissioning works) where there may be extensive debris, and/or extensive seabed disturbance resulting from the decommissioning operations, it may be appropriate to undertake seabed clearance verification using trawl-type gear following debris clearance operations.

We consider seabed verification surveys using trawl-type gear to be unnecessary and/or undesirable when an operator can demonstrate and provide evidence that there is not extensive debris and/or extensive seabed disturbance, or the location is within certain marine protected areas or protected habitats and species have been identified.

In both cases and/or if there are concerns in relation to the safety of fishing vessels, discussions regarding the most appropriate seabed verification method(s) should be discussed with the relevant national fishing federation and environmental manager.

### **1.2.2 Areas outside safety zones, including pipelines routes.**

Seabed clearance verification surveys using over trawl methods should only be required to supplement ROV recovery in specific circumstances.

There will be circumstances where snagging hazards are located and the use of chain mats to remediate seabed snagging hazards e.g., clay berms would be appropriate.

If there is a concrete patio around a well location and/or there have been issues cutting the conductor to -3 m below seabed, then the operator and OPRED need to

be satisfied that the concrete patio and/or conductor is not an obstruction or hazard. Under such circumstances the most appropriate method(s) of over trawl verification should be discussed with the relevant national fishing federation and environmental manager.

In addition, the removal of towheads and the use of rock protection at the pipeline ends is also a common scenario and it would be acceptable in these circumstances to use over trawl methodology to verify over-trawl-ability regardless of whether in a protected area or not. However, a targeted approach would be recommended.

### 1.3 Marine licence requirements

All debris removal operations and seabed clearance verification surveys using over trawl methods relating to decommissioning, including debris removal using chain mat nets or Drag. Net gear are licensable under the Marine and Coastal Access Act 2009. A licence application containing full details of the proposals should therefore be submitted to EMT.