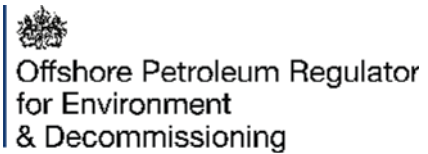


Our Ref: 01.01.01.01-6720U
UKOP Doc Ref:1409339



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

Registered No.: 00140141

Date: 15th August 2025

Department for Energy Security &
Net Zero

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ



www.gov.uk/desnz
opred@energysecurity.gov.uk

Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020
FLAGS pipeline, UXO clearance operations**

A screening direction for the project detailed in your application, reference PL/2573/0 (Version 5), dated 13th August 2025 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 opred@energysecurity.gov.uk.

Yours faithfully

[REDACTED]

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**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**

FLAGS pipeline, UXO clearance operations

PL/2573/0 (Version 5)

Whereas SHELL U.K. LIMITED has made an application dated 13th August 2025, 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/5669.

Effective Date: 15th August 2025

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Offshore Petroleum Regulator
for Environment
& Decommissioning

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 18 August 2025 until 31 March 2026.

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: opred@energysecurity.gov.uk

3 Nature of stabilisation or protection materials

Rock deposits

1060 tonnes of clean, inert rock material, containing minimal fines, (The quantity of rock deposited should be the minimum required to provide the necessary stabilisation or protection, and any surplus rock must be returned to land).

Sand deposits

600 tonnes of sand. (The quantity of sand deposited should be the minimum required to provide the necessary stabilisation or protection, and any surplus sand must be returned to land).

Sand bags deposits

200 tonnes of clean, sand material containing minimal fines, 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 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.

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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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Offshore Petroleum Regulator
for Environment
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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:

No comments

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

opred@energysecurity.gov.uk

or

Offshore Petroleum Regulator for Environment & Decommissioning
Department for Energy Security & Net Zero
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [REDACTED]

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. This document 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 relevant 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 Project

Having regard, 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

This screening direction is for the deposit of pipeline protection 1060 tonnes of rock, 600 tonnes of sand and 200 tonnes of sand in biodegradable bags following UXO removal under the FLAGS pipeline (PL2).

Description of project

The Far North Liquid and associated Gas (FLAGS) pipeline is located in the Northern North Sea (NNS), the 36" pipeline runs from the Brent field to St Fergus Gas Terminal, the location of the proposed operations lies 72 km from the Scottish coastline (Shetland) and 103 km from the UK/Norway median line.

During a routine inspection of the pipeline in December 2024 an Unexploded Ordnance (UXO) Squid Projectile was identified to be located underneath the FLAGS

pipeline in Block 8/1. The UXO will be carefully moved to a safe distance from the pipelines, to enable access to the UXO, localised seabed dredging will be undertaken. Then, using low order deflagration to dispose of the UXO, enabling it to be removed safely. Provisions are in place to allow 2 further attempts at low order deflagration disposal. As a contingency should low order disposal not be successful, a high order disposal will be carried out as last resort. Following removal of the UXO, PL2 pipeline will require new deposits to make it safe and stable by infilling the dredged area with permanent deposits of rock, sand and sandbags. A Marine Licence (ML/1312) and European Protected Species Licence (DL/104) have been granted alongside this screening direction to cover the use of explosives for the operation.

The project is not at risk from natural disasters given its location in UK offshore waters, or unplanned major accident scenarios leading to an environmental incident.

No cumulative interactions are foreseen with any other existing or approved projects.

There is no risk to human health from the works to deposit protective and support materials on the seabed.

Location of 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 FLAGS pipeline is located in the Northern North Sea (NNS), the 36" pipeline runs from the Brent field to St Fergus Gas Terminal, the location of the proposed operations lies 72 km from the Scottish coastline (Shetland) and 103km from the UK/Norway median line. Water depths are approximately 135m, the predominant current in the location is dominated by two Atlantic flows, with circulation variable in the centre.

The FLAGS pipeline traverses the offshore circalittoral mud within Block 8/1. The benthic fauna is dominated by brittle star communities with polychaetes, bivalves and echinoderms. No Annex I habitats were identified in the area. No other benthic features of conservation importance are thought to occur in the vicinity of the proposed operations. The nearest protected site is the Pobie Bank Reef Special Area of Conservation (SAC) which is 57km to the northwest of the project location.

The project works will take place at a time when a number of fish species may be found using the area as spawning, juvenile or nursery locations. The NNS overall has a moderate to high diversity and density of cetaceans. Cetacean species likely to occur in Block 8/1 include harbour porpoise, white sided dolphin, white beaked dolphin, Risso's dolphin and minke whale. Densities are low to moderate with sightings most common in July and August (coinciding with the earliest likely period of operations). Pinnipeds such as the grey seal and the harbour seal may occur in the project area in very low densities but are far more common close to shore.

Seabirds are common in the area during the whole year with an upper expected density of 20 to 30 individuals per square km. The project area is primarily used for demersal fishing, but with a low historical effort. There are no Marine Protected Areas within 40km of the proposed FLAGS UXO clearance location. Shipping intensity at the project location is high. The surrounding area comprises other decommissioned oil and gas infrastructure, but no current oil and gas activities are taking place except for the FLAGS pipeline. There are no renewable energy locations in proximity. There is a wreck located approximately 13km to the north east.

Given the location of the project, the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi) or (vii) of Schedule 5 have not been given particular regard with respect to 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 impacts on the environment from the activities associated with the project were assessed, with particular focus on the predominant impacts resulting from physical presence of the installed deposits and seabed disturbance resulting from the deposit of those materials. 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 vessels involved with the work programme will not have an exclusion area attributed to them and would be able to move away from location in an emergency. The installations of the various types of deposits are deemed necessary to protect the pipeline from possible spans and prevent snagging with the pipeline infrastructure and will not pose a hazard to fishing gear. The project is in a low-level fishing area and so the impact on other users of the sea is not expected to be significant.

The total area of seabed permanently impacted by the introduction of support and protective materials will be 0.186km². Seabed disturbance will result in the direct loss of habitat. This however, is small in extent. Although seabed impacts will cause mortality of individuals, impacts to benthic species at a population level are not expected given the relatively localised nature of the operations in comparison to the surrounding seabed.

The impact to the seabed environment at the location has therefore been assessed as not significant. The interaction with fish spawning and nursery locations is assessed as not significant given the large areas that the spawning and nursery grounds cover. Juvenile fish will be able to avoid interaction with any deposits installed on the seabed. The impact to fish species is therefore not significant. The quantity of deposits to the seabed is inclusive of a contingency allowance, which may not be used, thus reducing the impact further.

Atmospheric emissions from the vessels conducting the operations have been assessed. Any emissions are expected to rapidly dispersed and temporary in nature. The impact of the vessel emissions will be mitigated by optimising vessel efficiency

(i.e. minimising the number of vessels used and vessel trips required to achieve the project deliverables) and hence minimising fuel use and avoiding the unnecessary operation of power generation / combustion equipment. Combustion of fuel results in a minor emission of CO₂ (0.001%) when viewed in the context of total UK offshore emissions. The environmental effects from emissions to air are not considered significant. There are no expected transboundary impacts as a result of the planned works , and no cumulative impacts have been identified given the other known existing and approved projects in the wider area.

Impacts associated with disposal by deflagration or detonation of the UXO are assessed in detail under applications ML/1312 and DL/104 but are considered to be not significant.

In the event that an unlikely and unplanned accidental vessel diesel release scenario occurred response measure would be implemented as the Shipboard Oil Pollution Emergency Plan (SOPEP). Diesel is a non-persistent hydrocarbon and the relatively small potential release volume indicates no significant impact. There are no expected transboundary impacts as a result of the project. The works will not contradict the policies and objectives of the Scottish National Marine Plan.

Decision

Taking all the above determinations into account, the Secretary of State has concluded that the project is not likely to have a significant impact on the environment, and so an EIA 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.