Our Ref: 01.01.01.01-6809U
UKOP Doc Ref:1421444

Offshore Petroleum Regulator for Environment & Decommissioning

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

Registered No.: 00140141

Date: 11th November 2025

Department for Energy Security & Net Zero

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [redacted]
Fax

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
PIPELINES PL25 and PL121

A screening direction for the project detailed in your application, reference PL/2585/0 (Version 3), dated 25th September 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

Signature Not Verified
Digitally signed by Department for Energy Security and Net Zero
Date: 2025.11.11 22:40:13 GMT
Reason: On behalf of the Secretary of State
Location: Offshore Petroleum Regulator for Environment and Decommissioning

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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

PIPELINES PL25 and PL121

PL/2585/0 (Version 3)

Whereas SHELL U.K. LIMITED has made an application dated 25th September 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/5685 and PA/5684.

Effective Date: 11th November 2025

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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 11 November 2025 until 31 December 2025.

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

2,992 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).

4 Location of pipeline and stabilisation or protection materials

Within an area bounded by the coordinates as described 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:

n/a

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]
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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

Summary of the project

The project is to deposit rock over areas of exposed pipeline on PL121 and PL25, the works will be undertaken via NSTA consent PA/5685. The intention is to provide protection to areas of exposed pipeline and provide extra weight to prevent buoyancy and further exposure and de-burial.

Description of the project

As part of their regular monitoring of infield and export pipelines Shell observed areas of pipeline which are no longer buried and are exposed on the seabed. Intervention is required to protect the pipeline, provide stability, minimise buoyancy and prevent further exposure, ensuring the long-term integrity of the pipelines. These works will involve the placement of rock from a fall pipe vessel. The rock will be deposited via either a DEMI Dynamically Positioned Fallpipe Vessel (DPFPV) Van Oord Flexible fallpipe vessel (FFPV). The minimum volume of rock has been proposed which minimise the area of seabed impact whilst also ensuring effective stabilisation and protection of the pipeline.

This application (PL/1157) proposes to deposit 2,992 tonnes of rock over pipeline PL121 and PL25.

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:-

PL25 is the 30" export pipeline for gas produced from the Shell Leman Installation onshore to Bacton Gas Terminal on the Norfolk coast. The PL121 4" MEG pipeline is laid in the same trench as the PL25 gas pipeline. The spans are located *c* . 26 km offshore from Bacton within block 48/29, at water depth of ~30 m. Both the pipelines are concrete-coated carbon steel. The seabed sediments in the deposit locations are made up of circalittoral course sediments (MD3).

Some of the deposits will be in marine protected areas, these are the:

Southern North Sea Special Area of Conservation (SAC) which is designated for the protection of harbour porpoise

and the Haisborough Hammond and Winterton SACs which is designated for the protection of subtidal sandbanks and reef which occurs in the form of biogenic sabellaria spinulosa aggregations.

The survey information does not suggest there is likely to be any Sabellaria reef located in the deposit locations meaning there is no overlap with the annex 1 reef MPA feature. Survey evidence found one isolated patch of old, most likely dead, aggregations of *Sabellaria spinulosa* is noted close to the exposed pipelines. Furthermore the deposits will be within the existing pipeline trench with some spreading outwith this footprint.

A wide range of seabird species utilise the area with the species composition and numbers varying throughout the year with the more common species in the breeding season being kittiwake, guillemot and lesser northern fulmar. seabird vulnerability to oiling varies from Very High to High sensitivity.

The freespans are located within the International Council for the Exploration of the Sea (ICES) rectangle 35F1.The area is important for a variety of fish species with the area acting as a nursery and spawning ground for several species such as cod, herring, horse mackarel, plaice and sole. Plaice and sole are known to spawn at high intensities in the region.

Cetacean abundance in the SNS is relatively low compared to the northern and central North Sea, with the exception being harbour porpoise and white beaked dolphin which are the most common species. Harbour porpoise in particular has been observed in relatively high densities in the operational area hence the area's designation as an SAC for harbour porpoise.

There is a considerable amount of human activity in the vicinity of the pipeline works. Fishing occurs at variable intensities along the pipelines with a mix of demersal trawling, pelagic and shellfisheries operating in the area. Shipping levels are considered moderate ranging from 5 to 10 hours per km2 per month, with areas of higher densities to the northeast along the pipeline routes to Leman ranging from 10 to 100 hours per km2 per month, associated with oil and gas operations

The area of proposed operations is located within a well-developed oil and gas production area with a number of pipelines and installations present with 6 platforms being within 10 km of the freespan location. There is associated oil and gas infrastructure in the area including a number of pipelines, flowlines and umbilicals.

There are several wrecks/obstructions within 10 km of the freespans. The closest is the wreck of the Trevear located *c.* 2.6 km north of the freespans, followed by an area of foul ground *c.* 3.7 km to the southeast.

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.

The rock will be deposited via either a DEMI Dynamically Positioned Fallpipe Vessel (DPFPV) Van Oord Flexible fallpipe vessel (FFPV).The vessel will notify other sea users of it's presence and advise a 500m avoidance area around the vessel to minimise the risk of interaction. There will thus be some small scale impact to vessel traffic but this is limited to the two days of operation after which vessel movements will return to normal. Furthermore, the deposits are intended to reduce the risks associated with fisheries interaction with the exposed pipeline as free-spanning pipelines represent a significant risk of snagging and entanglement.

The placement of the rock will cause disturbance to the seabed in the immediate area. The deposits will cover the natural sandy seabed overlaying it with a hard surface which will support difference species and create different habitat characteristics compared to the pre-existing seabed. The total area of seabed to be covered by the deposits as part of this application is 3 704m. This represents a small proportion of the respective seabed sediment types found in the wider geographic area of the southern North Sea. The deposits will also be placed directly over the existing pipeline, meaning of this 3 704m2 of impacted seabed a large part proportion is comprised of either pipeline or the scoured and highly disturbed seabed immediately adjacent to the pipeline.

The placement of the pipeline deposits will also create a secondary impact through the creation of a small sediment plume, which will increase turbidity and sedimentation in the immediate vicinity. The naturally high sediment loads, mobile sandy substrate and small size of the plume mean that these impacts will not be significant.

The Haisborough Hammond and Winterton SAC has conservation objectives to restore the extent and distribution of the subtidal sandbank feature within the site. This restore objective is driven by the view that the site is in unfavourable condition which is partly due to the presence of existing or consented energy infrastructure e.g. offshore windfarms and oil and gas, which has caused the loss of sandbank habitat. Whilst the pipeline deposit campaign will cause some further change to the extent of sandy habitat in the SAC, the area of seabed that will be covered by rock is so small that it cannot make a significant change to the overall condition, populations or ecological function of the SAC either alone or in-combination. Namely the area of the deposits in the Haisborough Hammond SAC from this project alone are 0.0037 km2 which equates to 0.0002% of the estimated area of sandbank in the site. Given that much of the area covered by deposits a large proportion is already characterised by

existing pipeline, the effect of the deposits on the SACs will not be significant.

The pipeline deposits will cover an area of the Southern North Sea (SAC) of approximately 0.0037 km2, which equates to < 0.00001% of the site. Whilst the deposits will change the character of the immediate area, from sandy sediment to a hard surface, this change is not expected to alter the prey availability or supporting habitats of harbour porpoise to an extent where the condition of the population or the objectives of the site could be affected.

Fish, marine mammals and benthic species are not considered to be significantly impacted. Underwater noise from the operations is considered to have a negligible impact on marine mammals and fish species as the majority of noise is of low frequency and is not impulsive.

The main risk of accidental release of hydrocarbons is the loss of diesel inventory from a vessel. The assessment showed that the probability of a diesel spill from a vessel involved in the project is very low, with numerous mitigation measures and procedures in place. Therefore, the risk of an oil spill event that could have a significant impact on the environment is minimal.

The proposed operation is planned to utilise a single vessel and atmospheric emissions have been assessed from the diesel used for this vessel and the time spent on location. The total atmospheric emissions from the vessel when undertaking the works will be 117 tonnes of carbon dioxide equivalent (CO2e) which accounts for 0.001% of the total offshore oil and gas UKCS CO2 emissions (using 2018 as a baseline). The emissions may result in a deterioration of the local air quality, but due to the relatively short duration of the work, and that the exposed conditions in the area will rapidly disperse the emissions, it is not anticipated that there will be a significant impact.

There are no expected transboundary effects from the operations. There are no planned discharges of offshore chemicals associated with the works

Whilst a number of other activities are occurring the in wider region which have an interaction with the seabed, the minor and small-scale nature of the effects resulting from the deposit campaign mean that that it will not cause any significant increase in cumulative impact.

The operations are in accordance with the English East and Offshore East Marine Plan.

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