Our Ref: 01.01.01.01-6793U
UKOP Doc Ref:1427676

Offshore Petroleum Regulator for Environment & Decommissioning

PERENCO UK LIMITED
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LONDON
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Registered No.: 04653066

Date: 15th December 2025

Department for Energy Security & Net Zero

AB1 Building
Crimon Place
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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
PIPELINE PL28

I refer to your amended application dated 12th December 2025, reference PL/2580/1 (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 opred@energysecurity.gov.uk.

Yours faithfully

Signature Not Verified

Digitally signed by Department for Energy Security and Net Zero
Date: 2025.12.15 11:07:38 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

PIPELINE PL28

PL/2580/1 (Version 1)

Whereas PERENCO UK LIMITED has made an application dated 12th December 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/5724 and PA/6002.

Effective Date: 15th December 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 17 October 2025 until 30 September 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 Bags

96 Bags of inert rock (Rock Filter Units - RFUs) containing minimal fines (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

32 concrete mattresses, each measuring 5.6 metres x 3 metres x 0.5 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

The deposits are placed at multiple locations as described in the the application documentation

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:

PL/2580/1 - was issued via email on the 12th December as it was outside office hours and was formally issued on the portal on the 15th December

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
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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

The following provides a summary of the assessment undertaken 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 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.

Having regard, in particular, 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 Changes to the Project

PL/2580/1 (Version 1)

Following an incident where a ship's anchor collided and dragged the PL/28 pipeline out of its trench a variation was submitted to install stabilisation materials beneath the now free spanning pipeline, to ensure its structural integrity. The deposits are to be laid as an emergency measure to provide immediate support to the pipeline to prevent damage or integrity issues. The application outlines the maximum number of deposits that will be required, however the true number of deposits placed will be decided when the vessel is on location and the works commence.

The deposits will, as a worst case scenario, consist of 80 Rock Filter Units (RFUs) and 30 Concrete Mattresses.

Summary of the project

The project is to deposit concrete mattresses and rock filler units over areas of exposed pipeline on PL28, the works will be undertaken via NSTA PWA consents PA/5724 and PA/6002 (covering the emergency works). The intention is to provide

protection to the 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 Perenco observed areas of pipeline which are no longer buried and are exposed on the seabed. Some of these exposures are large enough that they meet risk criteria meaning that intervention is required. This intervention will protect the pipeline, provide stability, minimise buoyancy and prevent further exposure, ensuring the long-term integrity of the pipelines. On the 7th December a merchant vessel dropped its anchor and dragged it accross the PL28 pipeline, pulling it from its trench and leaving it freespanning by approximately 50 metres. Further deposits were added to the application as an emergency measure to remedy this new freespan. These works will involve the targeted placement of flexible concrete mattresses and rock filter units (which are bags of small rocks) over parts of the exposed pipe. The mattresses and RFUs will be deposited via an ROV support vessel. The minimum number of deposits have been proposed which minimise the area of seabed impact whilst also ensuring effective stabilisation and protection of the pipeline.

This application is one part of a wider campaign by Perenco to place protective deposits over their pipelines in the Southern North Sea. Through this campaign Perenco are looking to deposit concrete mattresses and RFUs over parts of the following pipelines: - PL22, PL23, PL24, PL28, PL448 and PL450.

This application (PL/2580) proposes to deposit 32 Mattresses and 96 rock filter units (RFUs) over pipeline PL28 (this includes the scheduled pipeline deposits and the emergency deposits) and will take place over several vessel campaigns with a total of 16 days.

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:-

PL28 connects the West Sole Alpha platform to the Dimlington Gas Terminal in the southern North Sea (SNS), traversing UKCS Blocks 47/11, 47/12, 47/7, 47/8, 47/9, 47/10, and 48/6. There are two sections along PL28 which require remedial intervention are located within UKCS Block 47/10 and 48/6, approximately 49 kilometres (km) northeast from Dimlington on the East Yorkshire coastline and 121km west of the UK / Netherlands median line

The water depth varies from 40 to 50 metres and the seabed sediments in the deposit locations are a variable mixture of circalittoral sands (EUNIS MD5&MC5), circalittoral mixed sediments and circalittoral coarse sediments (MD3). The seabed is characterised by highly mobile sandy sediments in a tide swept dynamic environment. The powerful hydrodynamic regime in the area creates a complex

landscape of sandbanks, sandwaves and changing seabed depths which create a particularly challenging environment for buried pipelines and infrastructure.

The tide predominantly flows in a south easterly direction with residual current flow to the east with modelling showing the tidal flow to be 0.356 metres per second (ms-1) and 0.065 ms-1 for spring and neap peak flows respectively. The annual mean significant wave height in the vicinity of the deposits location ranges from 1.51 m to 1.80 m and dominant wind directions between the south west and north west.

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

Holderness Offshore Marine Conservation Zone (MCZ) which is designated for 3 broadscale sedimentary habitats, geological features and bivalve ocean quahog (Arctica islandica)

Multibeam Survey footage suggests the deposits will be placed on mobile sandy sediments as indicated by ripple features and scour depressions..

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. Furthermore, the operator will collect ROV footage of each deposit location prior to placement to check whether any sabellaria structures are present. If Sabellaria is present the operator will attempt to microsite the deposits away from the reef to minimise damage.

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 black backed gull whilst in summer it is guillemot, fulmar and razorbill. Due to the wide area and time frame over which the deposits will occur seabird vulnerability to oiling varies from low sensitivity to high sensitivity.

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, nephrops, 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 and shellfisheries operating in the area. Shipping levels are considered high

with large numbers of cargo vessels and ferries between the UK and continental Europe traversing the works area with offshore supports vessel activity also being high.

There is a significant amount of oil and gas infrastructure in UKCS Block 48/6, where the proposed deposits are located, there are 53 wells, of which 7 are Completed (shut-in), 21 are Completed (Operating), 9 are Abandoned Phase 3, 5 are Abandoned Phase 2, with the remainder Abandoned Phase 1; 10 are classified as decommissioned. The West Sole Bravo NUI platform is located less than 0.25 km south from one of the proposed deposit locations, West Sole Charlie NUI is 4.4 km northwest, and the Hyde NUI is 11.3 km northwest. 28 Pipeline features exist within 48/6, 2 are operated by Harbour Energy (PL930, PL929),1 is operated by Neo Energy (PL2612), and the remaining 25 features by PUK. PL2162, PL95, PL1875, PL837, PL145 and PL94 cross paths with PL28 at one of the deposit locations.

The PL28 deposit locations are not within any active carbon capture & storage license areas but is part of the UK SNS Area 6 carbon capture & storage zone. There are no operational offshore wind facilities within UKCS Block 47/10, however an offshore wind cable exists (Hornsea Project 2) within 48/6, 4.4 km southeast of deposit location 2. The nearest offshore wind area is the operational Hornsea Project 2 development 25 km northeast of the deposit location 2, 54 km northeast of deposit location 1.

Some of the deposits lay within an MOD practice range which require MOD to be notified of any structure. There are a large number of wrecks in the region of the works but none within 500m of the deposits and there are no aggregate licence areas affected.

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 mattresses and RFUs will be lowered onto the pipelines from an ROV support vessel. The vessel will notify other sea users of its 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 16 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 deposits i.e. mattresses and RFUs, 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 mattress and RFUs deposited as part of this application is 1008m2 and over the whole SNS pipeline deposit campaign it is 2987 m2. This represents a very 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 2987m2 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 pipeline deposits will cover an area of the Southern North Sea (SAC) of approximately 945m2 from this project alone, the area covered by the whole SNS pipeline deposit campaign is 2471m2, which equates to 0.000007% of the site, which represents an insignificant proportion 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.

The pipeline deposits over PL28 will cover 959 m2 of the Holderness Offshore MCZ (0.000082% of the total MPA area). Given that of the area covered by deposits a large proportion is already characterised by existing pipeline i.e. the RFUs are placed beneath and on top of the pipeline, the footprint of the deposits on the MCZ are too small to have any significant effect on its conservation objectives.

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 work vessels and atmospheric emissions

have been assessed from the diesel used for these vessels and the time spent on location. The total atmospheric emissions from the vessels when undertaking the works will be 92.96 tonnes of carbon dioxide equivalent (CO2e) which accounts for 0.002433% of the total offshore oil and gas UKCS CO2 emissions (using 2023 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