



Offshore Petroleum Regulator
for Environment & Decommissioning

ES/2024/018

[REDACTED]
Ithaca Oil and Gas Limited
Hill of Rubislaw
Aberdeen
AB15 6XL

Department for Energy Security &
Net Zero

Offshore Petroleum Regulator for
Environment & Decommissioning
AB1 Building
Wing C
Crimon Place
Aberdeen
AB10 1BJ

Tel [REDACTED]

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www.gov.uk/desnz
OPRED@Energysecurity.gov.uk

Dear [REDACTED]

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

NOTICE UNDER REGULATION 12(1)

FOTLA FIELD DEVELOPMENT

The Offshore Petroleum Regulator for Environment and Decommissioning ("OPRED") acting on behalf of the Secretary of State for Energy Security and Net Zero ("the Secretary of State") is currently considering the Environmental Statement ("ES") and the representations received from the public consultation process in relation to the above project which have been published on <https://www.gov.uk/government/publications/fotla-field-development>. Ithaca Oil and Gas Limited is hereby required to provide further information in relation to the following:

General Comments

1. As stated in the supplementary guidance (published June 2025): the Secretary of State will consider the environmental effects of the project (as required by the Offshore EIA Regulations) and will form a view of the overall balance of advantage between any potential significant effects on the environment and wider benefits to the interests of the nation and any other relevant factors in proceeding with the project. In reaching this view the Secretary of State will usually consider, amongst other matters, the severity, extent, understanding and duration of the significant effects, the Government's overall energy and environmental objectives, and the potential economic and other advantages of the project proceeding. This includes an assessment of the extent to which the project aligns with the Government's stated objectives for the future of the North Sea. Ithaca Oil and Gas Limited may wish to provide relevant information for the Secretary of State to consider when reaching a decision on whether or not to agree to the grant of consent. This may include, as appropriate, information related to:
 - a. Energy security during the transition to a future energy system, including the contribution of hydrocarbons to the overall supply mix and

the contribution of and the role that UKCS production can play in meeting domestic demand.

- b. Job creation/retention for North Sea communities and in the supply chain and the contribution to economic growth.
- c. The extent to which the project may extend the life of, or better utilise, existing infrastructure or support the managed decommissioning of legacy infrastructure (for example, the extent to which the project can become part of a 'low carbon' hub by sharing infrastructure with offshore wind, hydrogen or CCS projects). From the information Ithaca Oil and Gas Limited has provided, this could include if applicable, but may not be limited to, the effects of the project on existing Britannia platforms, the Scottish Area Gas Evacuation (SAGE) pipeline system, the Forties Pipeline System (FPS), the Kinneil Terminal and the St Fergus Gas Terminal.

The information provided should be sufficiently detailed and robust for the Secretary of State to make an assessment of it – this could include, where appropriate, detailing the methodologies, sensitivity analysis and assumptions used, as well as placing figures in context and providing narrative on any benefits and other relevant factors.

2. There are a number of inconsistencies either within or between different sections of the Environmental Statement (ES) and it is unclear how some conclusions have been reached. Therefore, there may be slight repetition of some of the comments within this Regulation 12(1) letter.
3. The reference list should be reviewed to ensure that a full and complete reference list is provided; for example;
 - a. The OSPAR (2010) reference cited in Section 5.2.1.3 refers to sea pens and burrowing megafauna rather than ocean salinity.
 - b. Ellis et al (2010) cited in Section 5.3.3, and the Marine Directorate (2023) reference cited in Section 5.3.4 aren't included in the Section 16 reference list.
 - c. Please confirm the source of the UK Government Greenhouse Gas (GHG) Conversion Factors for Company Reporting (DESNZ, 2025) cited in Section 10.1.6. The reference provided within Section 16 is to the UK Energy Portal.
 - d. Section 12.2.4.2 references JNCC (2010) however it is unclear whether JNCC (2010a) or JNCC (2010b) is being referred to.

Section 1.1: Project background and Summary:

4. Section 1.1: *Project Background and Summary*. Please clarify what topside modifications and additions are required on Britannia to accommodate the production from the Fotla field and if there will be any change on how the combustion plant will be operated.
5. Section 1.1: *Project Background and Summary*. The volume of oil expected to be produced varies between the Environmental Statement (ES) and the Field Development Plan (FDP). Please confirm the volume of oil that is expected over the 15 years life of field.
6. Section 1.1 *Project Background and Summary*. The cessation of production dates for Britannia differ between the Fotla FDP and Table 3.2 of the Environmental Statement. Please discuss with Harbour and confirm the current CoP date for Britannia. If Britannia ceases production before the end of the

expected life of field for the Fotla development, what are the plans for the Fotla development.

7. Section 1.1 *Project Background and Summary* (pp. 1–3) states that concrete protection mattresses and grout bags are proposed to protect the spools and control jumpers. A pre-lay rock berm and potentially crossing supports along with additional concrete mattresses or grout bags will be used where the route crosses the 24" Bruce to Forties Unity condensate pipeline. This crossing will include the placement of rock for protection. The use of concrete mattresses, grout bags, rock bags, or similar protection measures in open waters can pose a snagging hazard and wider safety risk to the fishing industry. Please clarify the reasoning for not adapting a 1"–5" rock cover laid to a 1:3 profile, followed by an over-trawl survey to confirm the area is safe for fishing activities to resume.
8. Please confirm that Ithaca Oil and Gas Limited will follow the latest decommissioning guidance when it comes to decommission the field and that Ithaca Oil and Gas Limited intends to fully removal all concrete mattresses (and grout bags) at decommissioning.

Chapter 2: Net Zero Action Plan

9. Section 2.6.1 *Recent Initiatives*. This section discusses recent emissions reduction initiatives across Ithaca Energy's operated and non-operated assets. It states that at Britannia, the zero routine flaring project was approved to enter Front-End Engineering and Design (FEED) stage and sanction. Please clarify the timeline for the zero routine flaring project coming on-line with the associated emissions reduction.
10. Section 2.6.3 *Harbour Energy Britannia Emissions Reduction Action Plan*. This section provides a high-level summary of the Britannia emissions reduction action plan. Please summarise the energy saving opportunities that are being progressed on Britannia and timelines for their implementation. Additionally, please clarify if the proposed Fotla development will have any impact on the Emissions Reduction Action Plan (ERAP) opportunities being progressed at Britannia.
11. Section 2.7 *Fotla Field Development*. This section states increased production at Britannia is assessed in Section 10, Atmospheric Emissions Impacts. Please clarify if this is referring to the increased power demand and therefore fuel use as a result of the Fotla development, rather than an increase in production from other fields tied back to the host installation.

Chapter 3: Option Selection

12. Section 3.3.3. *Britannia Tie-back Options and Topsides Constraints*. In Table 3.5 under Option A4, the available ullage for Fotla is 4,000 bwpd, which is stated to equate to 20% of Fotla's water cut. Section 4.8.4 states the maximum water cut is 8,988 bbl/day. Please clarify what is the unconstrained water volume per day at Fotla.
13. Section 3.4.1. *Mobile Offshore Drilling Unit*. The preferred option for a mobile offshore drilling unit is an anchored semi-submersible drilling rig. Please confirm that either:
 - a. A dynamically positioned semi-submersible drilling rig will not be used for drilling at Fotla, or;

- b. Update the emissions assessment to account for the higher fuel consumption of a dynamically positioned semi-submersible compared to an anchored semi-submersible drilling rig.
14. Section 3.5.4 *Pipeline and Umbilical Installation*. The Field Development Plan (FDP) states the gas lift pipeline will be trenched and backfilled. Please clarify:
- a. Why there appears to be a discrepancy in approach compared to the FDP. The Department notes that the approach will be confirmed during detailed design trenching analysis.
 - b. The text states that a worst-case assessment of blanket rock placement over the entire gas lift pipeline will be assessed however the seabed disturbance for rock placement over the gas lift pipeline is for contingency only (1,200 m²; Table 9.2). You may wish to consider comment 64(a) in your response.
 - c. Please clarify if the required rock material depth is measured from the top of the pipeline.
15. Section 3.5.4 *Pipeline and Umbilical Installation*:
- a. Page 3-26 states that, to allow for installation tolerances, the two pipeline trenches will be installed approximately 40 m apart. Please confirm if the 40 m is adequate separation from a fishing-safety perspective, as this distance poses a snagging risk to trawl doors when crossing the pipelines.
 - b. Due to the potential snagging risks associated with seabed interactions during construction, please confirm if any pre-lay crossing placement will be supported by the presence of a guard vessel (GV). This would help mitigate the risk of fishing gear interacting with the crossing material and would also reduce the likelihood of the crossing being displaced prior to installation. Please confirm if a guard vessel will be used.
16. Section 3.6.1 *Produced Water Management*: For new installations with produced water streams, or existing installations where new produced water streams will be installed, the requirements of OSPAR 2001/1¹ (i.e. zero discharge of oil in produced water as a point of departure) must be considered at the design phase. Under OSPAR Recommendation 2001/1, no individual offshore installation should exceed a performance standard of 30 mg/l for dispersed oil in produced water discharged into the sea as a monthly average.
- a. Please confirm how Ithaca Oil and Gas Limited will meet the OSPAR 2001/1 recommendation.
 - b. Please provide further details on the scope of works for the Alder separator internals upgrade and the degasser internals replacement.
 - c. Ithaca Oil and Gas Limited must further provide a demonstration that the selected equipment is BAT.
 - d. Ithaca Oil and Gas Limited should provide a justification as to why produced water reinjection is not an achievable disposal route for Fotla produced water.
 - e. Please provide a summary of the 2024 produced water study undertaken by NOV Wellstream UK (Britannia Fotla Tie-back

¹ OSPAR Recommendation 2001/1 for the Management of Produced Water from Offshore Installations.

Separation & Produced Water Treatment System BAT/BEP Study Report).

- f. Please clarify what criteria will be used to determine whether the Best Available Technology (BAT) and Best Environmental Practice (BEP) options identified as amber in the produced water study (NOV, 2024) will be implemented.

Chapter 4: Project Description

17. Section 4.5.2 *Position and Anchoring of the MODU*. The manifold location in Figure 4.5 does not align with the proposed manifold location in Table 4.9. Please confirm the proposed manifold location.
18. Section 4.5.4 *Well Design*. The well section lengths in Figure 4.6 do not align with the well section lengths discussed in Section 4.5.4. For example, the 26" section is 443 m in Figure 4.6 and Table 4.7 but is stated to be 534.3 m in Section 4.5.4. The section lengths of the 12.25" section also do not align. Please clarify the proposed section lengths and review the drill cuttings volumes to ensure the worst-case seabed impacts have been assessed.
19. Section 4.5.5 *Drilling Muds and Cuttings*: In Table 4.7, please clarify why:
 - a. The 12.25" contingency sidetrack section length (1,456 m) is longer than the 12.25" mainbore section length (1,416 m).
 - b. In the well Section column, please confirm if the cuttings generated from the 8.5" section is for both the mainbore and sidetrack sections.
20. Section 4.5.6 *Cementing Strategy*: This states the worst-case cement discharge is 492 m³, with up to 47 m³ being discharged per well for the 30" conductor and 249 m³ per well for the 20" surface casing. Please clarify:
 - a. If the worst-case cement discharge should be 592 m³ (47 m³ for the 30" conductor plus 249m³ for the 20" casing equals 296 m³ per well; 2 wells would be 592m³) rather than 492 m³.
 - b. If the seabed disturbance assessment remains valid.
 - c. If the discharge of up to 592 m³ (see comment 20a) of cement will impact on the ability of Ithaca Oil and Gas Limited to decommission the proposed seabed infrastructure.
21. Section 4.5.8 *Well completions and Cleanup*. This states that well testing may be undertaken from either the MODU or via the Britannia platform. Please clarify:
 - a. What criteria will be used to determine whether well testing is undertaken from the MODU or from Britannia.
 - b. Why emissions will be lower if the well test is conducted at Britannia.
22. Section 4.6.1 *Overview* and Section 4.6.4 *Pipeline System*: The information provided in Sections 4.6.1 and 4.6.4 indicates a 10" nominal bore pipe in pipe production pipeline has been selected for the development. The FDP (Section 3.4.4) states an 8" nominal bore pipeline. Please clarify which is correct.
23. Section 4.6.4 *Pipeline System*. Please clarify the distance between:
 - a. The Fotla infrastructure and the Sadie drill centre.
 - b. The closest distance between the Fotla gas lift pipeline and the Fotla production pipeline to the Finlaggan pipeline.
 - c. Please clarify if the proximity of the Fotla infrastructure to other existing infrastructure will impact other users of the sea.

24. Section 4.6.5 *Pipeline and Umbilical Installation and Rock Protection*: Please clarify how Ithaca Oil and Gas Limited will determine the residual risk from the pipeline installation to other users of the sea. This must include consideration of the presence of hard clays on the seabed due to development's works has the potential to create operational challenges and safety risks for fishing gear.
25. Section 4.6.5 *Pipeline and Umbilical Installation and Rock Protection*. This section states "Once both pipelines are installed, they will be protected by a 200 m section of rock placement cover, along with 50 m and 75 m transition sections either side guiding the gas lift pipeline and the Fotla production pipeline back into their respective trenches, respectively". Please clarify how the area of disturbance has been calculated for:
- Blanket rock placement.
 - Production pipeline crossing and trench transition.
 - Gas lift pipeline crossing and trench transition.
 - Trench transitions at the Fotla and Britannia manifolds.
 - Grout bags.
- The response should include drawings where appropriate to help inform OPRED's understanding of how the area of disturbance has been calculated.
26. Section 4.6.5 *Pipeline and Umbilical Installation and Rock Protection*. The section states that "both the production and gas lift pipeline will be trenched into the seabed using a mechanical pipeline trenching plough and both pipelines will have blanket 0.6 m rock cover protection installed, as a worst-case scenario". The rock placement along the trenched infrastructure will be below the seabed height and will likely be backfilled naturally by adjacent soft sediments in the future.
- After interacting with the trench spoils, trawl doors are likely to drop into the open ditch, increasing the likelihood of gear becoming trapped or damaged especially where seabed sediment is hard. Considering the trench spoils that will be deposited along both sides of the trench, and that an open ditch will remain after the rock-dumping please clarify:
- The depth of the open ditch remaining once rock placement has been completed.
 - The anticipated time frame for backfilling the ditch to seabed level.
 - If Ithaca Oil and Gas Limited has considered any potential snagging risks for trawl doors when crossing the pipeline.
 - Any mitigation measures to be put into place.
27. Section 4.6.7 *Pipeline Maintenance*. This states that the Fotla facilities will be added to the existing integrity management system for the Greater Britannia Area (GBA) which will comprise of regular inspections by side-scan sonar and any anomalies detected will be followed up by a visual inspection.
- Please confirm the frequency of side scan sonar surveys.
 - Considering the pipeline is to be rock dumped, please clarify what the visual inspection would show?
28. Section 4.6.9 *Britannia Riser Selection and Approaches* and Section 4.8.1 *Separation of Produced Fluids*. Table 4.13 states that the Britannia Bridged Link Platform (BLP) J5 riser will be used for the Fotla J-tube (umbilical) and that this was changed during the host FEED studies. The FDP states that

- the Britannia BLP J4 riser will be used. Please confirm which riser will be used for the Fotla J-tube (umbilical).
29. Section 4.7.2.2 *Britannia Bridge Linked Platform (BLP)*: Please confirm if there is a produced water sampling point for the Fotla fluids prior to discharge.
 30. Section 4.7.3 *Britannia Topsides Modification to Accommodate Fotla*: Please clarify:
 - a. If a new topsides umbilical termination unit (TUTU) will be installed; this is listed in FDP.
 - b. Whether the exiting hydraulic power unit (HPU) will be repurposed or replaced. The FDP states a new HPU will be installed.
 31. Section 4.8.5 *Flaring and Venting*: Please clarify if the Fotla development will impact the quantity of gas emitted via continuous venting at the BLP flare (stripping gas, flare purging and vessel blanketing). Any increase in emissions must be assessed.
 32. Section 4.8.5 *Flaring and Venting*: Please provide the Department a summary of the Kent (2025) report referenced. The summary should contain sufficient detail, including extracts of the report if and where appropriate, to enable clear understanding how the increase in power demand on the Britannia platforms has been determined and therefore how the associated increase in operational emissions has been calculated.
 33. Section 4.8.6 *Power Generation*:
 - a. Please confirm the maximum output rating of the MARS 100 T15000 gas turbine generators as the 9.8 MW stated is inconsistent with the Britannia PPC permit. Please clarify if there is any impact on the emissions assessment undertaken.
 - b. Please clarify why in Table 4.16 the power demand for some users (condensate export compressor, fuel gas heater, Brodgar produced water pump, suction scrubber condensate pump) is lower under the Fotla mid-case scenario compared to the base case.
 - c. Please clarify why in Table 4.16 the fuel gas heater power demand is lower in the Fotla high case scenario compared to the base case. Please clarify if there is any impact from the above points on the emissions assessment undertaken.
 34. Section 4.8.6 *Power Generation*: Please clarify how it has been determined that the introduction of Fotla gas will increase the overall molecular weight of the gas. What is the predicted change in heating value and net calorific value, how have these been determined and what is the change in power consumption for the long-term compression and export compressors.

Chapter 5 Local Environment

35. Section 5.1.2 *Other Environmental Surveys and Reports*. Table 5.1 states the Alba field contains 'fine sediments'. There is no information on the sediment composition across the Alba field making comparisons of the Fotla field to the wider area difficult. Please provide further information on the sediment composition at both the Fotla and Alba fields, for example but not limited to mean sand, fines and gravel composition, and mean particle size.
36. Section 5.2.2 *Seabed Sediments*. Please clarify what the seabed habitat classifications were in the 2023 survey, including along the pipeline route.

37. Section 5.2.3 *Seabed Features*. Please clarify the number of pockmarks found along the pipeline route, have these been taken into account when deciding the pipeline route, and if so how?
38. Section 5.2.3 *Seabed Features*: Figure 5.6 shows a ca. 3 km long magnetometer contact. Are there any indications what this is, and will it impact the proposed pipeline route? Are there any indications as to what the items of debris recorded within the survey area are?
39. Section 5.2.4.1 *Nutrients*: The total organic matter levels in 2023 are noted to be approximately twice those recorded in 2019.
- Were the analysis methods similar and could the difference be due to an artefact of different analytical methods such as, but not limited to, temperature and carbonate removal.
 - The total organic matter levels are notably higher in 2023 compared to 2019 but the total organic carbon levels in the two surveys are similar indicating an input of nutrients from nearby infrastructure is unlikely to be the cause of the difference. Please review the reasoning after examination of analysis methods.
40. Section 5.2.4.2 *Hydrocarbons*: Mean total polycyclic aromatic hydrocarbon (PAH) levels are compared to UKOOA (2001) mean background concentrations, however comparison of PAH levels to UKOOA mean background concentrations does not provide an assessment of the impacts of PAH levels on faunal communities. You may wish to refer to OSPAR Agreement 2009-2², which details effects range low values and environmental assessment concentrations that can assist in the assessment of contaminants in marine sediments and the potential adverse effects on marine species.
41. Section 5.2.4.2 *Hydrocarbons*. This section states “Spatial variability of hydrocarbon concentrations was low between all stations sampled in 2023 (Gardline, 2024), indicating a broadly even influence of hydrocarbons across both infield and pipeline stations gas chromatography analysis, indicating hydrocarbon origins to include terrestrial plant sources and highly weathered and biogenic material”. Can you please clarify what you mean?
42. Section 5.2.4.3 *Heavy Metals*: The comparison provided in Table 5.4 is to UKOOA (2001) data from stations >5 km from the nearest platform. Please clarify how it has been determined that metals concentrations are typical of sediment close to historic infrastructure (for clarity, close suggests significantly nearer infrastructure than 5 km).
43. Section 5.3.2.2 *Site Specific Data*: An indication of the *Arctica Islandica* (ocean quahog) abundance would be beneficial in order to assess the significance of the impact on this protected species. Please provide further information on mitigation measures which may minimise the impact of the proposed development on ocean quahog, for example, by undertaking operations outside of spawning period (June to October). Please clarify if any adult ocean quahog were recorded in the environmental surveys.
44. Section 5.3.3 *Fish and Shellfish*: Please clarify the impact of the Fotla development on sandeels, and whether the sediment type is conducive to sandeel spawning in the development area. Please review the sediment

² OSPAR Agreement 2009/2. Agreement on CEMP Assessment Criteria for the QSR 2010.

type for all benthic spawning species and update the impact assessment as required.

45. Section 5.3.3 *Fish and Shellfish*: The development area is a sensitive biological zone that overlaps with critical life stages of commercially important species:
 - a. If the operation is within 1 km of cod, sandeel or herring spawning and the operations are to take place during spawning period specifically January to April, please demonstrate that stock level impacts are not likely including an assessment of potential cumulative impact.
 - b. Please provide confirmation that any noise from the operations will be minimised during the heightened period of concern (January to April).
46. Section 5.3.6.1 *Whales, Dolphins, and Porpoises*: Please clarify:
 - a. How the maps and data published in Waggitt et al. (2019) have been used to determine low, moderate and high abundance of cetaceans as presented in Table 5.7. The maps in the supporting information have scales of abundance but it's not clear how this translates to Table 5.7.
 - b. The densities of Atlantic white sided dolphins and Risso's dolphins do not align with data for SCANS-IV Block NS-E. Please review the abundance data and clarify whether the worst-case impact on cetaceans, including in Section 12 remains valid.
 - c. A justification for the use of SCANS-IV Block NS-E data, rather than NS-D or NS-G, to supplement the NS-G data should be provided.
47. Section 5.3.6.2.1 *Grey Seal*. This states grey seals are not expected to be encountered in the project area. This contradicts discussion of grey seals in Section 5.3.6.2.2 which states grey seals may be present in the Fofla development area, although the number of individuals will be low, with Figure 5.11 indicating between 1.1 and 10 individuals per 25 km². Please clarify whether grey seals and harbour seals are likely to be present in the area of the proposed project as the information provided is inconsistent.
48. Section 5.3.7 *Seabirds*. In Table 5.8, please confirm that the 'tick' indicates an important month for all seabirds combined and clarify how this has been determined.
49. Section 5.3.7 *Seabirds*. Please clarify why Atlantic puffins, which are on the IUCN red list, are not included in the discussion on protected species in the project area. The presence of Atlantic puffins is discussed on page 183 and in Table 5.8.
50. Section 5.4.1 Commercial Fisheries:
 - a. Please provide further clarity on how fishing effort can be considered low. The reference provided is to NMPi, a GIS database, with fishing effort layer considering data from 2018-2022. Does the landing and value data for 2024 indicate a comparable fishing effort to that assessed in the Environmental Statement?
 - b. ICES rectangle 45F1 is more heavily fished (effort) with higher landings values in recent years; how does this relate to the area of activities and fishing ground impacts? What proportion of seabed impacts will occur in ICES rectangle 45F1?
 - c. Please clarify if the installation or removal of infrastructure will impact commercial fishing operations or pose a hazard to other sea users.

51. Section 5.4.3 *Shipping*. The shipping density data refers to an EMODnet, (2023) reference. This predates some of the data which is from 2019 to 2024. Please clarify the source of the data.
52. Section 5.4.8 *Wrecks and Archaeology*. This states no wrecks have been identified within the Fotla field or along the pipeline route, with the nearest wreck to the Fotla development located 12 km southeast. There are 2 wrecks belonging to the Palmyra approximately 2 km to 3 km from Britannia. Please clarify if these wrecks were included in the baseline assessment within Section 5.4.8. If not, the wrecks and archaeology section should be reviewed and impact assessments updated as required. Furthermore, the impact of the Fotla field development on wrecks identified above should be considered within National Marine Plan Policy GEN 6 (Section 6.3.1.6).
53. Section 5.5.6 *Global Climate Change Effects*: Please review this section to ensure it is clear what the baseline information is and to ensure sufficient information is provided to enable an assessment against the baseline of the likely significant effects of the project as listed in Schedule 6(4)(f) and Schedule 6(5) of the 2020 EIA Regulations as relevant. The supplementary EIA guidance (p9) states '*A realistic and reasonable description of the current state of the environment (baseline scenario) should be presented in the ES*'.
54. Section 5.6 *Summary*. In Table 5.20, the seabird sensitivity should be reviewed in particular:
- It is not clear how the low, medium, high and very high assessment relates to the information provided within earlier sections (e.g. Table 5.9) nor is the colour coding used in the table easy to distinguish.
 - Table 5.20 and Section 5.3 are inconsistent. Please review the table in relation to the preceding sections and ensure consistent information is provided.

Chapter 7 Impact Assessment Methodology

55. Section 7.3.2 Value of Receptors: In Table 7.2, under Natural Environment, points (a) under 'negligible' and 'low' are the same 'No sites or species of conservation interest'. Please clarify how these receptors values should be differentiated.

Chapter 8 Drilling Impacts

56. Section 8.1.1 *Muds and Cuttings*. The information provided in this section should be reviewed and clarified in particular:
- It is not clear whether the volumes of drilling muds and cuttings included within Table 8.1 includes a re-spud for both wells. From Section 8.2, it is inferred these weights do not include a re-spud. Please clarify and provide the worst-case volumes that include a re-spud.
 - Please note that the discharge into the sea of cuttings contaminated with oil-based fluids at a concentration greater than 1% by weight on dry cuttings is prohibited. Please clarify if thermally treated cuttings contaminated with oil-based fluids at a concentration equal to or less than 1% by weight on dry cuttings can be achieved.
 - Please clarify if any additional vessel movements would be required if the cuttings were to be skipped and shipped. If so, please undertake

an assessment of the additional emissions that will result from this approach.

- d. What is the quantity of drilling mud that would be required if a contingency sidetrack is required.
- e. Table 8.2: It is unclear if the numbers provided within Section Length, Drilling Muds and Cuttings Generated is for the 8 1/2" Mainbore and sidetrack combined or separate.

57. Section 8.2 *Drill Cuttings Modelling*: Please clarify:

- a. The area of deposition of 10 mm thickness (0.015394 km²) in the text doesn't align with Table 8.4.
- b. The extent of deposition of cuttings between 1 mm and 10 mm thick doesn't align with the cuttings breakdown provided in Table 8.4. Please review.
- c. The total areal extent of cuttings deposition in the text (918,200 m²) doesn't align with Table 8.4.

58. Section 8.3.1 *Seabed Impacts on Benthos, Fish and Shellfish*:

- a. Please provide a justification why WBM and thermally treated LTOBM cuttings have been assessed the same.
- b. Please provide a justification for using a cuttings deposit threshold of 10mm to assess the area of seabed disturbance and the impact on benthos. Please note that the ES should assess worst case scenario. If there is a more conservative appropriate threshold, please update the impact assessment.
- c. What is the cumulative impact of the potential deposit of cement on the seabed and cuttings associated with drilling the wells? Please refer to Comment 20a as to whether the cement discharge is 492 m³ or 592 m³.
- d. Please provide further clarity on why 'minor' was chosen for the magnitude of effect. The definition of minor in table 7.1, includes the description 'a transient environmental effect not lasting more than a few weeks'.
- e. Any cement deposits on the seabed must be minimised and should be deposited so that it does not pose a future hazard to other users of the sea or impact the ability to decommission adjacent infrastructure. Ithaca Oil and Gas Limited should confirm how this will be taken into consideration when developing the work scope.

59. Section 8.5 *Mitigation*. Several of the mitigation measures outlined within Section 8.5 are legislative requirements (e.g. submitting a chemical permit application) rather than mitigation. Please review the mitigation measures currently outlined and identify whether any additional mitigation measures can be identified.

60. Section 8.5 *Mitigation*. The ES has shown that the proposed operations may have an impact on the following features of conservation interest:

- Arctica islandica (ocean quahog; OSPAR and PMF)
- Sea-pen and burrowing megafauna communities (OSPAR)
- Burrowed mud (PMF)
- Offshore deep-sea muds (PMF)
- Mud habitats in deep water (UKBAP)

Please clarify how Ithaca Oil and Gas Limited will follow the mitigation hierarchy to avoid, reduce and minimise impacts to the above-mentioned features, as much as practicably possible during the proposed operations.

Chapter 9 Physical Presence Impacts

61. Section 9.1.1 *Temporary Seabed Disturbances*. Please confirm that the 25 m disturbance corridor includes the area of seabed impacted by the deposit of the trench spoil. If not, this should be assessed.
62. Section 9.1.1 *Temporary Seabed Disturbance*. This states "Two trenches are required over a distance of 14.4 km each. The total area of temporary disturbance will be 780,800 m²". Within Table 9.1 the disturbance area of 780,800 m² relates to all temporary disturbance rather than the disturbance from the two trenches. Please clarify.
63. Section 9.1.2 *Permanent Seabed Disturbances*: Ithaca Oil and Gas Limited should confirm how deposits to the seabed will be minimised as much as practicably possible during the proposed operations. This includes minimising the amount of hard substrate material introduced and the use of a jetting trencher for pipeline trenching.
64. Section 9.1.2 *Permanent Seabed Disturbances*. Please clarify the following:
 - a. Table 9.2 states that contingent rock placement is required for the gas lift pipeline. Section 4.6.5 states the gas lift pipeline will have blanket rock protection. Please review and provide an updated impact assessment for the blanket rock protection.
 - b. Please clarify the dimensions of the mattresses that will be used.
 - c. Please provide details of how the area impacted by permanent deposits has been calculated for each row.
 - d. Please confirm that the area of seabed disturbance from the installation of the production and gas lift pipelines is included within the seabed disturbance for the associated rock protection.
 - e. Please review the total area of permanent seabed impacted by permanent deposits.
65. Section 9.2.1 *Temporary Effects from Seabed Disturbance and Plumes*. Please provide the rationale for determining the effect magnitude of seabed disturbance on the benthic community was minor, noting the recovery timescales quoted for sea pens and ocean quahog. According to the criteria detailed in Section 7, 'Moderate' is good recovery potential within 2 years and 'Major' is medium term damage (> 2 yrs) but with likelihood of recovery within 10 years. The overall effects should also be reviewed.
66. Section 9.2.2 *Permanent Effects from Placement of Subsea Infrastructure and Protection Material*:
 - a. Ithaca Oil and Gas Limited describe the effect magnitude as "minor" based on assessment that the small scale of the impacts are within the scope of existing variability within the context of the wider region. However, the habitat recovery period is likely to be years rather than weeks for permanent seabed disturbance. Please clarify the rationale for describing the effect magnitude as 'minor' in line with the assessment criteria established in Section 7 Impact Assessment Methodology.

- b. Please clarify how the pipeline seabed impacts can be considered reversible given the proposed rock placement along both the production pipeline and gas lift pipeline.
- 67. Section 9.3.1 *Impacts on Commercial Fisheries*: Please clarify what mitigation measures will be in place to protect both the pipeline and other users of the sea during the 6-month period of trenching/backfilling/rock placement activities associated with pipeline installation.
- 68. Section 9.4 *Mitigation Measures*: Please clarify:
 - a. What is the likelihood of mud berms being present after pipeline installation and if present, how will Ithaca Oil and Gas Limited make these safe. What is the potential environmental impact from these operations?
 - b. Have any other mitigation measures been considered such as guard vessels during anchor pre-lay and underwater beacons until infrastructure has been charted?
- 69. Section 9.5 *In-Combination, Cumulative and Transboundary Impacts*: Please clarify:
 - a. How the area of disturbance (0.138 km²) has been calculated.
 - b. How effects can be largely reversed on decommissioning as blanket rock protection for the production pipeline contributes ca. 82% of the area.
- 70. Section 9.5 *In-Combination, Cumulative and Transboundary Impacts*: Please confirm Ithaca Oil and Gas Limited will minimise the amount of hard substrate introduced to the marine environment and explore technological advances and options for later removal of this material at the planning stage. Ithaca Oil and Gas Limited should provide further details regarding the expected fate of deposits after end of production, i.e., will it be left in situ or recovered.

Chapter 10 Atmospheric Emissions

Ithaca Oil and Gas Limited must provide sufficient information to ensure that all emissions calculations provided within Section 10 are transparent. There may be some duplication of comments within this Section.

- 71. Section 10 *Atmospheric Emissions*. This states that Scope 3, category 4 and 6 emissions are scoped into the emissions assessment. Please clarify where this information can be found. If this information is not provided within the ES then please provide details on these category 4 and 6 Scope 3 emissions, with evidence to justify the selected categories of scope 3 emissions, including evidence to support how emissions have been quantified for each selected category, as per the Supplementary Guidance (p10).
- 72. Section 10 *Atmospheric Emissions*. Table 10.2 presents the 100-year global warming potential (GWP) factors which are used in the emissions assessment. Please clarify the rationale for using GWP factors from 2013 rather than the most up to date global warming potential values. Please clarify if there is any impact on the emissions assessment if the most up to date GWP factors were used.
- 73. Section 10.1 *Quantification of Fofla Atmospheric Emissions*: There is no assessment of power demand on the asset during the 'construction phase' e.g. equipment modifications etc. Emissions associated with the

construction phase of the project should be estimated or a rationale provided for scoping them out of the assessment, with reference made to published guidance such as ISEP, 2026³ and IEMA, 2022⁴.

74. Section 10.1.1 *Data Sources and Uncertainty*. This states that 'generic emission factors from sectoral guidelines and other relevant literature as indicated and referenced throughout this section'. There are no references for the emissions factors used to calculate the Scope 1 emissions associated with the project, and as such, it is unclear how the emissions have been calculated. References to the emissions factors used to determine the project atmospheric emissions must be provided for Tables 10.3, 10.4 and 10.5 in Section 10, and should include the emissions factors used for the MODU, helicopter and each vessel type.
75. Section 10.1.2 *Estimation of Vessel Emissions During Drilling Operations*. Please confirm if you have assessed worst case diesel usage when you have assessed 20 t/d of diesel from a MODU.
76. Section 10.1.3 *Flaring during Well Clean-up and Commissioning*. Please clarify how the split between oil and gas has been determined within Table 10.4.
77. Section 10.1.5 *Estimation of Operational Emissions During the Production Phase of the Fotla field*. It is unclear how the emissions associated with the production phase of the project have been calculated. Please clarify how emissions in Table 10.6 have been calculated. Comment 32 should be considered in your response.
78. Section 10.1.6 *Estimation of Downstream Combustion Emissions of Produced Hydrocarbons (Scope 3, Category 9, 10 and 11 emissions)*.
- a. Please clarify which well to tank values have been used to calculate the Scope 3 emissions.
 - b. The final paragraph of this section states "*the Scope 3 category 8, 9 and 10 estimates should therefore be considered to provide an indication of scale only for the purpose of putting them into context*". As category 8 emissions are not covered, please confirm if this is intended to refer to 9 and 10 only? Category 11 emissions are understood to have been estimated on the basis of 100% combustion and considering the highest anticipated production, in accordance with the Supplementary Guidance.
The Supplementary Guidance states that, whilst other scope 3 emission categories can be assessed if the developer considers this relevant, an estimate of scope 3 category 11 emissions should always be presented. Please assess these emissions against a do nothing scenario as set out in the Guidance (p9). Comments 87c and 117b should also be considered in your response.
79. Section 10.1.6 *Estimation of Downstream Combustion Emissions of Produced Hydrocarbons (Scope 3, Category 9, 10 and 11 emissions)*. Please provide the rationale for using fuel oil as a representative proxy for calculating the Scope 3 emissions associated with the proposed project.

³ ISEP (2026) Assessing greenhouse gas emissions and evaluating their significance with supplementary guidance (Edition 2.1).

⁴ Institute of Environmental Management & Assessment (IEMA) Guide (2022) Assessing Greenhouse Gas Emissions and Evaluating their Significance.

80. Section 10.1.6 *Estimation of Downstream Combustion Emissions of Produced Hydrocarbons (Scope 3, Category 9, 10 and 11 emissions)*. Please clarify:

- a. Why the high case emissions in Table 10.7 are lower in 2027 and 2028 compared to the mid-case when production is greater in the high case scenario therefore Category 11 emissions might be expected to be higher.
- b. Please review the emissions presented in Table 10.7 as in both mid case and high case scenarios, there are instances where the total emissions don't correlate with the sum of the Category 9,10 and Category 11 emissions presented.

81. Section 10.1.7 *Summary of all Emissions Combined over the Fotla Life of Field*. In Table 10.8 and Table 10.9:

- a. Please review the total emissions column in Table 10.8, as in some rows, the total value doesn't align with the sum of preceding columns (e.g. 2028), or, for example, subsea installation in the total row is lower than the emissions in 2027.
- b. The Scope 3, Category 9, 10 and 11 emissions in Table 10.9 appear not to align with the values presented in Table 10.8. For example, in 2028, the sum of the oil and gas Scope 3 Category 9, 10 and 11 emissions is 3105 kton CO₂e. This is higher than the emissions presented in Tables 10.7 and 10.8.

Please review the Tables and provide revised information.

82. Section 10.2.1 *NSTA Targets for the Oil and Gas Industry*. This contains inaccuracies in the calculations (page 10-13). Please provide:

- a. The UK oil and gas emissions in 2024.
- b. The Fotla GHG contribution in 2028.

83. Section 10.2.1 *NSTA Targets for the Oil and Gas Industry*.

- a. This section states that emissions listed in Section 10.1.2 to 10.1.7 are put into context of NSTA targets for the UK oil and gas industry. Sections 10.1.6 and 10.1.7 include scope 3 emissions. Please confirm which emissions are being assessed in Section 10.2.1.
- b. This section details that the Fotla field development 'taking up only a small part within the amount allocated for new developments'. The source of information within Figure 10.2 provides data titled 'Illustrative projection from development of undeveloped discoveries' and 'Illustrative projection from development of future discoveries'. As such, the figure presents potential production from new fields and isn't specifically allocated to new fields. Please review the assessment of the Fotla development and provide further information on how Ithaca Oil and Gas Limited consider that the Fotla development aligns with the North Sea Transition Deal and industry emissions reduction targets. This should be considered in conjunction with comment 87d.
- c. Please clarify the source of the data used in Figure 10.3 in the NSTA reference cited.

84. Section 10.2.2 *UK Carbon Budgets*: The Fotla emissions are presented against the fourth, fifth and sixth UK carbon budgets in Table 10.9. Ithaca Oil and Gas Limited have concluded that the Fotla emissions, including scope 3 category 11 emissions, 'contribute a very small part of the projected annual UK target carbon budgets set, remaining well in line with the

Balanced Pathway strategy towards Net Zero by 2050'. However, consideration of global emissions is expected in assessing scope 3 category 11 emissions. Further, presenting the emissions from a single project against UK national targets or global GHG emissions does not provide a meaningful insight. The Supplementary EIA Guidance states that "*Global GHG emissions are a relevant consideration to assessing scope 3 emissions and in understanding "the impact of the project on climate", as required under Schedule 6 of the EIA Regulations*"; while the "*expectation is that scope 1 and 2 GHG emissions are assessed by the developer for the impact of the project on climate, which should include consideration of the Climate Change Act 2008, and associated carbon budgets*" (p.8). The conclusions in Sections 10.4 and 10.6 should reflect this please (we note that the notes to Table 10.9 recognise that no meaningful estimate can be made of how much produced oil will ultimately be processed and used domestically).

85. Section 10.2.3 *Global CO2 Targets*. This states 'additional and sustained future commitments from all parties signed up to the Paris Agreement will still be required to reach the blue pathway limiting global warming to 2 °C or the even lower turquoise pathway of 1.5 °C with no or limited overshoot as characterised by SSP-1.9'. Please provide further justification for the magnitude of effect from the Fotla field in Section 10.4, in light of the statement in Section 10.2.3 and the criteria established in Table 7.1 and Table 7.4. Comments 84 and 87 should also be considered in the response.
86. Section 10.3 *Assessment of Localised and Regional Air Pollution Impacts*: Please clarify:
 - a. How Ithaca Oil and Gas Limited determined no air pollution impacts are expected from the increase in air pollutants at Britannia.
 - b. Which air pollutants are being referred to.
 - c. Please provide an assessment of the air quality during the drilling, installation and production phases of the operation.
87. Section 10.4 *Cumulative Global Climate Change Impacts*: Please update the assessment to:
 - a. Provide a cumulative impacts assessment for the Fotla field development. The assessment should be undertaken against the baseline scenario for the environment and its likely evolution over the lifetime of the project and should consider how the environment might change with the addition of the project.
 - b. Explain how cumulative global effects from emissions associated with other projects on a global scale have been considered as noted in the supplementary EIA guidance. There are sources of projected emissions from current plans and projects you may wish to consider such as IISD (2022)⁵, Trout et al. (2022)⁶, IEA (2023)⁷ and Muttitt et al. (2025)⁸.

⁵ International Institute for Sustainable Development, 2022. Navigating Energy Transitions.

⁶ Trout et al., 2022. Environmental Research Letters 17 064010. DOI 10.1088/1748-9326/ac6228 (<https://doi.org/10.1088/1748-9326/ac6228>).

⁷ International Energy Agency (2023). The Oil and Gas Industry in Net Zero Transitions.

⁸ Greg Muttitt, Fergus Green and Steve Pye. The Climate Implications of New Oil and Gas Fields in the UK—An Overview of the Evidence, June 2025, UCL Policy Lab, UCL Energy Institute, and UCL Department of Political Science.

- c. Reference to SSP 1-1.9 and SSP 1-2.6 is made in Section 10.4. Where emissions reduction pathways or illustrative mitigation pathways are used, the assumptions, limitations and uncertainties in the modelled data should be explained to help contextualise the scope 3 emissions from the project and include a comparative assessment of the 'do nothing' scenario. This should also include details of how these have been taken into account when reaching conclusions on significance.
 - d. Please clarify how the assessment accounts for emissions associated with current and approved fossil fuel projects (i.e. how much demand /emission reduction pathway "space" is already met by existing/approved supply) and how this affects your conclusions. You may wish to consider United Nations Environment Programme production gap reports in your response.
 - e. Please include an assessment of any likely significant effects of the project, including those resulting from cumulative effects with other existing or approved projects. This should include matters listed in Schedule 6(4)(f) and Schedule 6(5) of the 2020 EIA Regulations as relevant.
 - f. This section concludes that '*the overall cumulative effect on global climate change is considered as minor adverse*' and that '*the GHG impacts associated with the Fotla field development are fully consistent with applicable existing and emerging policy requirements and good practice design standards for this type of development*'. Please expand providing further consideration to the likelihood of the presented pathways in support of the assessment and consideration of the Fotla emissions with other existing plans / projects.
88. Section 10.5 *Mitigation Measures*: The measures described within this section are either measures to minimise Scope 1 emissions associated with the project or effects of the project on the Britannia installation (paragraph 3). Please clarify:
- a. How Ithaca Oil and Gas Limited will work with Harbour Energy to minimise Scope 1 emissions from the project.
 - b. Whether any of the measures detailed will mitigate against GHG emissions to the atmosphere.

Chapter 11 Marine Discharges Impacts

- 89. Section 11.1.3 *Produced Water Modelling*: Please clarify if there has been any change in the use and discharge of offshore chemicals at Britannia since 2019 and if so, is the change likely to have resulted in an increase or decrease in the likely risk profile of the produced water discharge.
- 90. Section 11.1.3 *Produced Water Modelling*: Please provide the rationale for the produced water discharge volume used in the produced water discharge modelling as it is lower than the maximum water cut (1,429 m³).
- 91. Section 11.1.3 *Produced Water Modelling*: This states that the Fotla produced water discharge plume has a higher density than Britannia produced water and will reach greater water depths. Section 11.2.2 subsequently states the Fotla produced water will remain in the top half of the water column. Please clarify the estimated depth to which the Fotla PW will descend and clarify the depth of the different produced water discharges in Figure 11.2.

92. Section 11.1.3 *Produced Water Modelling*: Please clarify how it was determined that the increase in maximum momentary EIF and time averaged EIF are mainly related to the increase in produced water being discharged. Further clarity on how this has been determined should be provided.
93. Section 11.2.3 *Effects on Fish and Shellfish*: Please clarify the magnitude of effect on fish and shellfish, which is described as 'low' as the effects listed in Table 7.1 are beneficial, negligible, minor, moderate, major and severe. Justification for the magnitude effect must be provided.
94. Section 11.3 *Mitigation*: Some of the mitigation measures proposed in this section are legislative requirements as opposed to mitigation. Please clarify if there is a definitive commitment to consider additional produced water treatment options such as the Mare's Tail Coalescer mentioned. If the criteria for implementing additional treatment options are different to those detailed in response to comment 16(f), please detail the criteria that would be used to determine whether such upgrades will be implemented.
95. Section 11.4 *In-combination, Cumulative and Transboundary Impacts*: Please provide clarity on how it was determined that 'the distance between discharges is large enough to allow for adequate dispersion and dilution' when Figure 11.2 shows the produced water plume (risk >5%) extends for many kilometres therefore there is the potential for mixing with produced water from Alba Northern Platform as noted earlier in Section 11.4.

Chapter 12 Underwater Noise Impacts

96. Section 12.2.4.2 *Pile Driving*: Please clarify whether any mitigation measures are proposed as the safety distance for piling is reached at 8 km.
97. Section 12.3.1.1 *Marine Mammals and Noise*: Killer whales are listed as being potentially present in the Fotta field (Table 5.7). Please clarify:
 - a. Which functional hearing group they fall within in Table 12.3.
 - b. If the assessment of impacts on cetaceans remains valid with the inclusion of this species.
98. Section 12.3.1.3 *Behavioural Disturbance of Cetaceans*: This section states 'low-frequency cetaceans are expected to exhibit behavioural reactions above the range of 1.6 km associated with TTS'. Section 12.3.1.3 *Behavioural Disturbance of Cetaceans*: This section states 'low-frequency cetaceans are expected to exhibit behavioural reactions above the range of 1.6 km associated with Temporary Threshold Shift (TTS)'. Section 12.1.3.2 states with a soft start, the TTS radius will be reduced to 686 m. Please clarify that the noise modelling provided is conservative in the estimation of the TTS zone.
99. Section 12.3.1.3 *Behavioural Disturbance of Cetaceans*. In Table 12.5, the densities of Atlantic white-sided dolphins and Risso's dolphin are listed as 0.0024/km² and 0.0094/km² respectively. The densities listed in the SCANS-IV report are Risso's dolphin (0.0702/km² in Block NS-E) and Atlantic white-sided dolphin (0.0146/km² in Block NS-E). Please review the number of individuals affected, the percentage of the population affected and reassess the significance of the noise generated and impact on marine mammals.
100. Section 12.3.2.2 *Injury and Auditory Thresholds for Fish* and Section 12.3.2.3 *Behavioural Disturbance of Fish*: Please clarify the rationale for stating the receptor value of fish species is 'medium'. Spotted ray, spurdog

and cod are on the OSPAR list of threatened and/or declining habitats and species, while cod are designated as 'vulnerable' on the IUCN red list. The 'very high' receptor category detailed in Table 7.2 states 'Internationally designated site or species' and 'a regularly occurring, globally threatened species or habitat essential for maintaining such species'.

101. Section 12.5 Mitigation Measures. This states a 500 m mitigation zone will be put in place for piling operations, however a 700 m mitigation zone was suggested in Section 12.3.1.2.
 - a. Please clarify the extent of the mitigation zone and whether one marine mammal observer will be sufficient to monitor the proposed mitigation zone. Section 12.6 also states that PTS and TTS is limited to within 500 m mitigation zone.
 - b. Please provide clarity on the most sensitive marine mammals has been determined and which hearing categories are being referred too.
102. Section 12.6 Conclusions: The temporary avoidance response area for pinnipeds is stated to be 1.65 km and 2.88 km, however Section 12.3.1.4 states 'the expected disturbance range from the pile is between 2,024 m and 3,294 m'. Please clarify the expected disturbance range for pinnipeds.

Chapter 13 Waste Management

103. Section 13 Waste Management: There's no assessment of the significance of the waste produced during the proposed project against the criteria established in Section 7. An assessment should be provided.

Chapter 14 Accidental Events

104. Section 14.1.3 Other Potential Sources of Oil: This section concludes 'the risk to the environment from these oils is regarded as negligible and is not considered further within this section'. Please clarify how it has been determined that the impact of an accidental release of 500 m³ of low toxicity oil-based mud to the environment is negligible. Please confirm that the magnitude of effect aligns with the description detailed in Table 7.1.
105. Section 14.4.1 Uncontrolled Well Blow-out: Please clarify whether the specific properties of the Fotla oil were used to model the well blow out scenario. If not, the properties of the analogue used must be provided and a justification provided for the analogue chosen.
106. Section 14.5.1.5 Shellfish: This states that 'it is extremely unlikely that hydrocarbons released from a subsea blow-out would remain near the seabed in significant concentrations to have such an effect, but that might not be the case for a diesel release as presented in Figure 14.8'. However, Figure 14.7 shows significant quantities of oil in sediment. Please clarify how it was determined that hydrocarbons from a subsea blow out would not impact sediment.
107. Section 14.5.1.7 Seabird: This section states the sensitivity of seabirds to oil pollution is 'low' throughout the year for UKCS Blocks 22/1 and 16/26 with the majority of the surrounding UKCS Blocks also considered to be 'low' sometimes increasing to 'medium' (Webb et al., 2016; Section 5.3.7). UKCS Blocks 22/1 and 16/27 have no data for November and December; please review this statement and clarify any impact on the significance assessment. This comment should be considered in conjunction with Comment 48.

108. Section 14.5.2.1 Commercial Fisheries: There is no assessment of the magnitude of effect, receptor value or significance of an oil spill reaching a rocky shore. This must be provided.
109. Section 14.5.4.2 Aquaculture: The receptor value for aquaculture has been described as 'medium' within this section. Please provide further clarification on how the receptor value has been determined to be 'medium'. In Table 7.2, medium is described as 'areas used by local fisheries but with nearby alternatives' while high is described as 'an area of regional importance for fisheries or of local importance but with no nearby alternatives'.
110. Section 14.6.1 Major Environmental Incident (MEI) Assessment Methodology: The MEI assessment criteria only considers protected sites with an expected minimum arrival time for oiling of 20 days or less, and a probability of more than 5 %. There is no consideration of the potential for an MEI related to protected species, for example birds or cetaceans. Please clarify what impact a release could have on protected species. Section 14.6.3 states the impacts of an uncontrolled well blow out on the favourable conservation status of marine life is considered within Section 14.5, however this information is not evident. Please provide.
111. Section 14.7.2.1 Initial Actions: Please clarify:
- If the OSPRAG capping device is compatible with the well design.
 - Where the second BOP will be located (e.g. subsea or drill floor).
112. Section 14.7.3.1 Oil Pollution Emergency Plan: Please confirm who will hold the Tier 1 OPEP and who would be the on-scene commander in case there was an incident from the Fotla field?
113. Section 14.8 Catastrophic Loss of the MODU, Support Vessel, Helicopter. This Section states a standby vessel will be on site through the life of the field to enforce the 500 m exclusion zone. This suggests the standby vessel will be located solely within the Fotla 500 m zone. Please clarify if the emission from the standby vessels has been included in the assessment in Section 10.1.5. If not included, then please provide an assessment of the vessel emissions if a vessel will be present in the Fotla field throughout field life and review and update the overall emissions assessment as required.

Chapter 15 Conclusions

114. Section 15.1 Drilling Impacts: This section states 'However, any adverse effects on the conservation features are expected to take place as a worst-case scenario up to 30 m from the point of discharge and will last for the duration of the activity'. However, the cuttings pile will be present for longer than the activity with Section 8.6 stating benthos within 30 m of the well locations will be lost over a medium to long time period (i.e. several to ten or more years). Please clarify how the conclusion 'impacts will last for the duration of the activity' was reached.
115. Section 15.2 Physical Presence Impacts: Please clarify whether a 500 m safety zone will be utilised for the planned subsea infrastructure.
116. Section 15.5 Underwater Noise Impacts: The receptor value of species in the area is stated to be 'low'. Some fish are included on the OSPAR list of threatened and/or declining species and habitats. Please

clarify how the receptor value was determined to be low with reference to Table 7.2.

Non-Technical Summary

117. Net Zero Action Plan: Please clarify:
 - a. The net zero solutions considered by prospective host platforms and the information requested / required to score this.
 - b. How the proposed Fotla development compares to the 'do nothing' scenario as referenced in the Scope 3 guidance.
118. Marine Discharges: Please confirm when the Fotla production wells are expected to produce water. This is inconsistent between the Field Development Plan and the Environmental Statement.

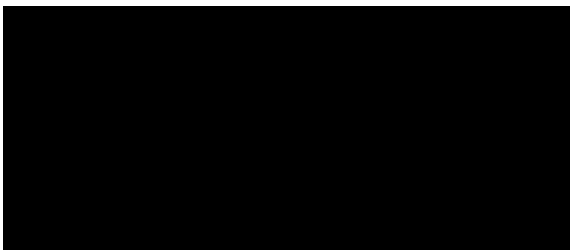
A.3 ENVID Matrices

119. The Table 2: The Fotla field development subsea and pipeline installation ENVID matrix have not scoped in the fishing industry for Item 7 "Rock dumping protection of production pipeline or other infrastructure" and Item 8 "Laying of concrete mattresses, grout bags etc for protection of infrastructure". Considering the above items potentially impact commercial fisheries, please clarify why "other users of the sea" and commercial fisheries have not been scoped in.

Your response will be reviewed, and consideration given as to whether any of the information provided ought to be made public. If so, OPRED will notify Ithaca Oil and Gas Limited under Regulation 12(3), and Ithaca Oil and Gas Limited will have to take further steps to publish information and make provision for further public consultation under Regulations 12(5) to 12(9).

OPRED looks forward to receiving your response so that we can progress our consideration of the ES.

Yours sincerely



.....
[Redacted]

Environmental Manager

The Offshore Petroleum Regulator for Environment and Decommissioning
For and on behalf of the Secretary of State for Energy Security and Net Zero