



Northern Lighthouse Board

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Your Ref: ES/2024/018
Our Ref: AL/OPS/ML/OFFOIL_131_25

Business Support Team
Offshore Petroleum Regulator for Environment & Decommissioning
Department for Energy Security & Net Zero
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23 December 2025

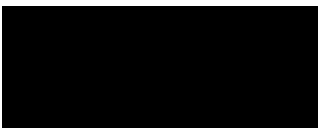
THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2020

I am writing in response to the application submitted by **Ithaca Oil & Gas Ltd** for consent to develop the Fotla field, UKCS Blocks 22/01b, in the Central North Sea.

It is noted that this field will comprise two production wells connected to a subsea manifold and tied back to the existing Britannia platforms via a new production pipeline.

Northern Lighthouse Board has no navigational objections to the field development proposal. On completion of the development, all 'as-built' positions should be provided to the UK Hydrographic Office to enable the update of navigational publications.

Yours sincerely



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F2

Dear Sir/Madam

I would like to comment on Public Consultation ES/2024/018 for the development of the Fotla Field.

I see it as nationally significant that this project is allowed to develop at speed.

When implemented it will make us slightly less vulnerable to events beyond our control elsewhere in the world.

It will assist our balance of payments, raise much needed tax revenue and provide well paid jobs in the energy sector.

I saw this consultation only by chance. Please could you tell me how can I ensure that I am aware of other similar consultations in future.

With thanks

[]

DESNZ
OPRED
Aberdeen

SCOTTISH GOVERNMENT, MARINE DIRECTORATE (SGMD) RESPONSE

ES/2024/018 - ITHACA - Fotla Field Development

Thank you for the opportunity to comment on ES/2024/018 - ITHACA - Fotla Field Development.

SGMD advise the application should meet the requirements and recommendations of:

- ❖ The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020 - (<https://www.legislation.gov.uk/ukxi/2020/1497/introduction/made>).
- ❖ The Petroleum Act 1998 (as amended) (<https://www.legislation.gov.uk/ukpga/1998/17/contents>).

Associated Guidance Documents:

- ❖ (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005109/The_Offshore_Oil_and_Gas_Exploration_Production_Unloading_and_Storage_Environmental_Impact_Assessment_Regulations_2020_-_A_Guide_July_2021.pdf) and
- ❖ (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/760560/Decom_Guidance_Notes_November_2018.pdf)

SGMD also advise the application should consider how the proposed works comply with Scotland's National Marine Plan, which was published in March 2015, in accordance with the Marine (Scotland) Act 2010. The Plan provides a comprehensive overarching framework for all marine activity in our waters. It enables sustainable development and use of Scotland's marine area in a way which will protect and enhance the marine environment whilst promoting both existing and emerging industries. Further information regarding Scotland's National Marine Plan can be found here: <https://www.gov.scot/publications/scotlands-national-marine-plan/>.

Discharges and Emissions

SGMD advise the site-specific modelling should provide the best understanding of the potential fate and impact of discharges / emissions. Where an assessment is not based on site specific modelling, SGMD recommend DESNZ satisfy themselves that studies used to support the impact assessment are comparable to the operation being undertaken.

Where cement deposits are expected at the seabed, SGMD advise that DESNZ ensure such deposits will not pose a future hazard to other sea users or impact the ability to decommission adjacent infrastructure.

Fish Spawning

If the operation is within or up to 1 km away from:

- ❖ A spawning area of a vulnerable benthic spawning species (sandeel / herring (1) or;
- ❖ An occasional / recurrent cod spawning area (1) and
- ❖ Sediments at the site are considered suitable for that species (Cod: coarse sand (2) herring: gravel, sandy gravel and gravely sand(1) and Sandeel: fines content of less than 10% (3)).

As defined by the following reports:

Marine Laboratory, 375 Victoria Road,
Aberdeen AB11 9DB
www.gov.scot/marinesdirectorate

- ❖ (1) Coull, K.A., Johnstone, R., and S.I. Rogers. 1998. Fisheries Sensitivity Maps in British Waters. Published and distributed by UKOOA Ltd (https://www.cefas.co.uk/media/o0fgfobd/sensi_maps.pdf);
- ❖ (1) Ellis, J.R., Milligan, S.P., Readdy, L., Taylor, N. and Brown, M.J. 2012. Spawning and nursery grounds of selected fish species in UK waters. *Sci. Ser. Tech. Rep.*, Cefas Lowestoft, 147: 56 pp. (<https://www.cefas.co.uk/publications/techrep/TechRep147.pdf>);
- ❖ (1) Aires, C., González-Irusta, J.M., Watret, R. (2014) Updating Fisheries Sensitivity Maps in British Waters. *Scottish Marine and Freshwater Science*, Vol 5 No 10. Edinburgh: Scottish Government, 88pp. DOI: 10.7489/1555-1 (<https://www.gov.scot/publications/scottish-marine-freshwater-science-volume-5-number-10-updating-fisheries/documents/>);
- ❖ (1) Boyle, G., New, P., 2018. ORJIP Impacts from Piling on Fish at Offshore Wind Sites: Collating Population Information, *Gap Analysis and Appraisal of Mitigation Options Collision and Avoidance Study*. Final report – June 2018. The Carbon Trust. United Kingdom. 247 pp (<https://www.carbontrust.com/news-and-events/news/new-research-provides-clarity-on-fish-spawning-hotspots-near-offshore-wind>).
- ❖ (2) As defined by José M. González-Irusta, Peter J. Wright, Spawning grounds of Atlantic cod (*Gadus morhua*) in the North Sea, *ICES Journal of Marine Science*, Volume 73, Issue 2, January/February 2016, Pages 304–315, (<https://doi.org/10.1093/icesjms/fsv180>).
- ❖ (3) NatureScot Commissioned Report 771: A review of the recovery potential and influencing factors of relevance to the management of habitats and species within Marine Protected Areas around Scotland ([NatureScot Commissioned Report 771: A review of the recovery potential and influencing factors of relevance to the management of habitats and species within Marine Protected Areas around Scotland | NatureScot](#)).

SGMD also recommend considering the following resources when assessing effects on gadoids and elasmobranchs:

- ❖ José M. González-Irusta, Peter J. Wright, Spawning grounds of Atlantic cod (*Gadus morhua*) in the North Sea, *ICES Journal of Marine Science*, Volume 73, Issue 2, January/February 2016, Pages 304–315, <https://doi.org/10.1093/icesjms/fsv180>
- ❖ González-Irusta, José & Wright, Peter. (2017). Spawning grounds of whiting (*Merlangius merlangus*). *Fisheries Research*. 195. 141-151. 10.1016/j.fishres.2017.07.005.
- ❖ González-Irusta, José & Wright, Peter. (2016). Spawning grounds of haddock (*Melanogrammus aeglefinus*) in the North Sea and West of Scotland. *Fisheries Research*. 183. 180-191. 10.1016/j.fishres.2016.05.028.
- ❖ Régner, T., Gibb, F.M., Clarke, J., Langton, R., Kinnear, S. and Boulcott, P. 2024. Elasmobranch distributions and interactions with fisheries. NatureScot Research Report 1365).

SGMD recommend the timing of the operation is moved out-with the spawning period for that species or that DESNZ satisfy themselves the operator has demonstrated that spawning stock level impacts are not likely, taking account of associated cumulative impacts.

If the operation is more than 1 km from a vulnerable benthic spawning species (sandeel / herring) spawning area or an occasional / recurrent cod spawning area, or the operator has demonstrated that the sediment type at the site is not suited to the spawning of the species of concern, SGMD have no specific concerns.

Commercial Fishing:

SGMD advise operators should demonstrate that the installation or removal of infrastructure will not significantly impact commercial fishing operations or pose a hazard to other sea users.

In order to demonstrate the nature and scale of fishing activity in the area, SGMD advise reference to the following data sources:

- ❖ Finalised Scottish Government fisheries statistics for 2024 (October 2024). Operators are advised to refer to the combined Excel spreadsheets which include statistics for 2020 - 2024. ([Scottish Sea Fisheries Statistics 2024 - gov.scot](#));
- ❖ Map layers on the National Marine Plan interactive (<http://marine.gov.scot/node/12674>) for the following:
 1. Tonnage for demersal, pelagic and shellfish species;
 2. Value (£) for demersal, pelagic and shellfish species;
 3. Effort (days) (by UK vessels >10m length) for demersal active (bottom trawls, dredges etc.); pelagic active (pelagic trawls, purse seines etc.); and passive (pots/creels, gillnets etc.).
- ❖ ICES Working Group on Spatial Fisheries Data (WGSFD; outputs from 2021 meeting) – ([Item - Working Group on Spatial Fisheries Data \(WGSFD; outputs from 2021 meeting\) - International Council for the Exploration of the Sea - Figshare](#))

- ❖ Map layers showing average annual fishing effort (mW fishing hours) in the Greater North Sea Ecoregion during 2015–2018 are also available via EMODNET (<https://www.emodnet-humanactivities.eu/view-data.php>).

Aquaculture and Shellfish Water Protected Areas

Where modelling demonstrates the possibility of oil reaching the Scottish coastline, if an accidental event were to occur, SGMD advise that DESNZ ensure impacts on aquaculture and Shellfish Water Protected Areas are considered. The following resources are advised:

- ❖ The National Marine Plan Interactive (<https://marinescotland.atkinsgeospatial.com/nmpi/>):
- ❖ Shellfish Water Protected Areas (<https://www.gov.scot/policies/water/protected-waters/>);
- ❖ Scotland's Aquaculture website ([Aquaculture Map | Scotland's Aquaculture](#)):
- ❖ The Scottish Shellfish Farm Production Survey 2024 ([Scottish Shellfish Farm Production Survey 2024 - gov.scot](#)) (These statistics are usually published in May each year);
- ❖ The Scottish Finfish Farm Production Survey 2024 ([Scottish Fish Farm Production Survey 2024 - gov.scot](#)) (These statistics are usually published in September each year).

SGMD do not provide advice on impacts from oil and gas activities to designated conservation sites, marine mammals, seabirds, accidental events, noise or greenhouse gas or methane emissions. SGMD may provide further and/or bespoke advice relevant to Marine Scotland's interests in response to future applications associated with this development / field.

Any further correspondence relating to this response should be directed to MS.PON15@gov.scot.

Regards

Scottish Government, Marine Directorate
13 January 2026

F4

Dear Oprod Business Support Team,

Thank you for the opportunity to comment on the Environmental Impact Assessment (EIA) Environmental Statement for the Fotla Field project. The Maritime and Coastguard Agency (MCA) is a statutory consultee and/or primary advisor (depending on the relevant legislation) to the marine licensing and offshore consenting regulators throughout the UK. The MCA has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours and marinas and any impact on our search and rescue obligations. The shipping and navigation elements of the Environmental Statement (ES) - Section 9.3.2 have been considered by representatives of UK Technical Services Navigation, and the MCA would like to respond as follows:

We note the proposed Project would involve:

- Two horizontal subsea production wells completed with two horizontal subsea Xmas trees;
- A three slot production and gas lift drill centre manifold;
- Two rigid tie-in spools connecting the Xmas trees to the manifold;
- A 14.4 km pipe in pipe production pipeline and a controls umbilical, which will be trenched and covered with rock protection material, between the Fotla field and the Britannia platforms;
- A separate 14.4 km gas lift pipeline, which will be trenched and backfilled between the Fotla field and the Britannia installations. Trench transitions will be covered with rock placement;
- A new riser base subsea isolation valve structure at Britannia, housing production and gas lift system subsea isolation valves and the umbilical termination assemblies;
- Existing spare risers on the Britannia platforms for the Fotla pipelines and umbilical; and
- Temporary anchored mooring system for the mobile offshore drilling unit during drilling operations.

We note that Shipping has been scoped in for potential navigation hazards from the rig and support vessels on page A.3-1 of the ES which we welcome. Although the ES states that *“Shipping density within the area is low to moderate with approximately 2 to 3 vessels passing through per day, mostly comprising oil industry support and service vessels”*, the MCA would expect a vessel traffic assessment (Shipping and Navigation) and a Collision Risk Management Assessment to be undertaken in order to minimize the

risk of ship collision. We note that an updated shipping study will be undertaken as part of any future Consent to Location application process which we welcome. We note the use of guard vessels and ERRVs, and the roles of each should be suitably defined whilst on location to monitor shipping traffic during installation. We understand that a 500m safety exclusion zone will be imposed around the MODU for the well drilling and around the drill centre manifold for the duration of the development. We welcome that consultation has been undertaken with Opred, JNCC, SFF and the Marine Directorate. In summary, we are content with the assessment undertaken in the ES on the understanding that the following is undertaken:

The MCA would expect the vessels to comply with all maritime safety legislations, and the UK Standard Marking Schedule for Offshore Installations.

We note that engagement with the Scottish Fishing Federation is being undertaken, which the MCA welcomes. The MCA would also expect the details for the vessels used and relevant contact information for emergency response procedures for HM Coastguard.

Subject to the Vessel traffic Assessment and Collision Risk Management Assessment, the MCA would likely expect the standard conditions as set out below for this development. The conditions used may vary but should be based on the Shipping and Navigation Risk Assessment, along with any other mitigation measures in respect of trenching, mattressing and over-trawlability protection where required.

Commencement of Works:

a) The UK Hydrographic Office (UKHO) and the Maritime Coastguard Agency (MCA) must be informed at least 48 hours in advance of the commencement of the Works.

b) Kingfisher Information Services and local operators must be informed at least two weeks in advance of the date of commencement of the Works. If determination of the application is made within two weeks prior to of the commencement of the Works, Kingfisher Information Services and Local Operators must be notified immediately following issue of the consent.

Communications with other bodies in relation to the consent conditions should be addressed to:

United Kingdom Hydrographic Office

Email to navwarnings@ukho.gov.uk,

and copy offshore.energy@ukho.gov.uk

or fax to Email to navwarnings@ukho.gov.uk,

and copy offshore.energy@ukho.gov.uk

or fax to +44 (0)1823 322352, marked for the attention of the Navigation Warnings Section.

Maritime and Coastguard Agency

Email to offshoreenergy.notifications@mcga.gov.uk, oelo@mcga.gov.uk and navigationsafety@mcga.gov.uk, or fax to +44 (0)2380 329204, marked for the attention of the Navigation Safety Branch

General Lighthouse Authorities

Trinity House (England, Wales and the Channel Islands) email to navigation@trinityhouse.co.uk, or telephone +44 (0)20 7481 6900, for the attention of the Navigation Directorate.

Northern Lighthouse Board (Scotland and the Isle of Man) email to navigation@nlb.org.uk, or fax to +44 (0)131 220 0235, marked for the attention of the Navigation Department.

Commissioner of Irish Lights (Northern Ireland and Republic of Ireland) email to Operations@irishlights.ie or fax to +353 (0)1271 5566.

Kingfisher Information Services

The Kingfisher Bulletin is online and works notices can be submitted and managed via a users' account at www.kingfisherbulletin.org. Alternatively email kingfisher@seafish.co.uk, or fax to +44 (0)1482 223310, marked for the attention of the Kingfisher Bulletin.

Local operators are defined as operators of vessels who regularly use the vessel routes identified within the Vessel Traffic Survey Report which is required to be produced, and submitted, as part of the Consent to Locate application process. Local operators should be informed via local notifications (also known as Local Notice to Mariners).

Local Notifications which can be sent via email should include the start date, duration, nature of activity including an image on a nautical chart, details of precautions, the potential impact on shipping and contact details. (All local notifications should be sent to the UK Hydrographic Office the responsible authority for charting, who will decide whether navigation warnings and/or Admiralty Notices to Mariners are also required. These local notifications should also be sent to MCA at offshoreenergy.notifications@mcga.gov.uk.

An Oil Pollution Emergency Plan and Emergency Response Procedure should also be in place.

Kind regards

UK Technical Services Navigation

Kind regards



Inverdee House, Baxter Street,
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Business Support Team
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Offshore Petroleum Regulator for Environment &
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JNCC Reference: OIA-11234
OPRED Reference: ES/2024/018
Date: 30 January 2026

Fotla Field Development, Ithaca Oil and Gas Limited, Environmental Statement

Thank you for consulting JNCC regarding the above-mentioned development proposed by Ithaca Oil and Gas Limited, for which we received the Environmental Statement (ES) on 22 December 2025. The Fotla Field Development Project comprises two production wells which will be drilled and tied back to the Britannia Platform via a new production pipeline. The proposed development is located in UKCS Blocks 22/1a, 22/1b and 16/26a in the Central North Sea.

The advice contained within this minute is provided by JNCC as part of our statutory advisory role to the UK Government and devolved administrations on issues relating to nature conservation in UK offshore waters (beyond the territorial limit).

The closest Marine Protected Area to the proposed operations is the Scanner Pockmark Special Area of Conservation (SAC), located approximately 26.3km from the proposed development and is designated for submarine structures made by leaking gases.

The proposed operations associated with the Fotla field development include the following:

- The drilling of two subsea production wells, completed with two horizontal subsea Xmas trees (using temporarily anchored MODU);
- Installation of a three-slot production and gas lift drill centre manifold;
- Installation of a new 14 km pipe-in-pipe production pipeline and a controls umbilical between the Fotla field and the Britannia installations;
- Installation of a new riser base subsea isolation valve (SSIV) structure at Britannia, housing production and gas lift system SSIVs and umbilical termination assemblies; and
- Use of existing spare risers on the Britannia platform and BLP for the Fotla pipelines and umbilical.

This application has not previously been reviewed by JNCC, however JNCC have responded to the Early Consultation Document through our Discretionary Advice Service (JNCC Reference: OIA-10265, dated 6 July 2024).

In addition to reviewing the Local Environment (Section 5) provided, our review has concentrated on the following sections of the ES:

- Introduction (Section 1);
- Option Selection (Section 3);
- Project description (Section 4);
- Impact Assessment Methodology (Section 7);
- Drilling Impacts (Section 8);
- Physical Presence Impacts (Section 9);
- Underwater Noise Impacts (Section 12);
- Conclusions (Section 15).

Our conclusions on these sections are provided below.

General comments

JNCC commend Ithaca Oil and Gas Limited on the detail and quality of the ES, as it is well presented and easy to follow. All aspects we would expect to be covered have been included with the appropriate level of detail. Our comments below are for information and to strengthen future PETS licence applications should the project be approved.

Impacts to the marine environment

Features of conservation interest

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)

JNCC strongly advise that the Applicant follow the mitigation hierarchy to avoid, reduce and minimise impacts to the above-mentioned features, as much as practicably possible during the proposed operations.

Seabed disturbance

JNCC acknowledge that some of the operational elements of the Fofla field development have yet to be decided and the Applicant has therefore included contingencies to provide a

realistic worst-case scenario of seabed disturbance. The total area expected to be temporarily disturbed during operations is 780,800m², and the permanent/long term disturbance is expected to be 139,072m². We continue to advise that the Applicant commits to reducing their impact on the environment 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.

We note that the Applicant has committed to using a Fall Pipe Vessel for rock placement operations to minimise the amount of rock required and are satisfied with this approach.

We also note that the Applicant has provided provisional commentary on stabilisation operations, including the following:

- Location of deposit sites
- Size/grade of rock to be used
- Tonnage/volume to be used
- Contingency tonnage/volume to be used
- Method of delivery to the seabed
- Footprint of rock
- Assessment of the impact

We request that the Applicant consider reducing 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. We request the applicant provide further details regarding the expected fate of deposits after end of production, i.e., will it be left *in situ* or recovered.

Cuttings

The Applicant has provided detailed drill cuttings dispersion modelling in Section 8.2 of the ES, which indicates the total area expected to be impacted by drill cuttings is 918,200m². With regard to the LTOBM, JNCC's preference is for the drill cuttings to be contained and shipped to shore for appropriate treatment and disposal to minimise potential impacts to the surrounding benthic marine environment.

Marine Ornithology Comments

JNCC have no comments or concerns.

Marine Mammal Comments

JNCC are content that all cetacean species within, or in the vicinity of, the proposed Fotla field development area have been identified in Section 5.3.6 Marine Mammals (Page 5-29).

Auditory injury

Based on the results from underwater noise modelling presented in Table 12.4 (Page 12-17) we can agree that the risk of auditory injury, either through permanent threshold shift (PTS) or temporary threshold shift (TTS) from drilling, trenching, pipe laying, and support vessel operations on marine mammals is negligible.

The noise modelling predicts that there is a risk of auditory injury from the proposed impact piling of four anchor piles required to fix the Fotla manifold to the seabed. JNCC agree that the risk of auditory injury is low and predicted PTS onset impact ranges will not exceed the 500m mitigation zone for all marine mammal hearing groups.

JNCC understand that the piling operations will be undertaken following the JNCC Protocol for minimising risk of injury to marine mammals from piling noise (JNCC, 2010b) and welcome this commitment.

Disturbance

The results presented in Table 12.5 (Section 12.3.1.3, Page 12-20 – 12-21) show that strongest anticipated behavioural response within a 2.4km radius based on the behavioural threshold of 120 dB re 1µPa will impact a maximum of 18.82 harbour porpoises. Harbour porpoise are identified as the most abundant species occurring within the project area and this number of individuals relates to 0.036% of the reference population.

From the information provided in Section 12.2.2.1 (page 12-4) we understand that the number and size of the piles being installed, four anchor piles at 914mm in diameter, and the duration of the activity taking approximately eight days, (including mobilisation, transit, installation of piles and subsea isolation valve (SSIV), and demobilisation). JNCC consider a significant disturbance if underwater noise will operate for longer than 4-6 weeks within the same area. Subsequently the duration of noise emitting activity proposed within this ES it is unlikely to result in significant disturbance to cetacean EPS populations in offshore waters, as outlined within [SNCCB guidance](#) (2010). Therefore, JNCC agree that the risk of disturbance to marine mammals from the underwater noise emitted during the piling operations will be low.

In-combination, Cumulative and Transboundary Impacts

JNCC agree that there will be *“no significant cumulative and/or transboundary impacts from noise generated during the proposed piling, drilling, trenching, pipe laying, and support vessel operations associated with the proposed Fotla field development.”* The operation is short lived and any effects will be relatively localised and not within a particularly sensitive area for marine mammals. We assume that there are no other noisy activities in the wider area planned

simultaneously or before or after the Fotla operation, since this is not detailed in the assessment. Future assessment should provide that information.

Please contact me with any questions regarding the above comments.

Yours sincerely,

[Redacted signature]

[Redacted name]

Email: [Redacted email address]

Telephone: [Redacted telephone number]



Our Ref: FH-OPRED- Fotla Field Development_Consultation /001/0026

Your Ref: Email dated 11/02/2026

23 March 2026

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The Offshore Petroleum Regulator for Environment and Decommissioning (OPRED)
AB1 Building,
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AB10 1BJ,
United Kingdom

OPRED@Energysecurity.gov.uk

Dear [Redacted]

SFF's Response to Fotla Field Development ES_Consultation

I refer to the Consultation on Fotla Field Development Environmental Statement (ES) consultation in your email of 11th February2026.

The Scottish Fishermen's Federation (SFF) appreciates the clearly laid out and detailed explanation of Ithaca Energy's ES for the Fotla Field Development and place on record our appreciation of the information provided.

Summary

The SFF notes that the proposed Fotla field development is a new development which will comprise two production wells connected to a subsea manifold and tied back to the existing Britannia platforms via a new production pipeline (a 14.4 km long 10"/16" (pipe-in-pipe) production pipeline). A 6" gas lift line will also be installed. The pipeline route from the Fotla field to Britannia will pass through UKCS Blocks 16/26a, 22/1a and 22/1a. The Fotla manifold will be a piled structure (fishing friendly).

The subsea infrastructure associated with the Fotla field development is as follows:

- The drilling of two subsea production wells completed with two horizontal subsea Xmas trees (using a temporarily anchored MODU);
- The installation of a 3-slot production and gas lift drill centre manifold;
- The installation of a new 14 km pipe-in-pipe production pipeline and a controls umbilical between the Fotla field and the Britannia installations;
- Installation of a new riser base subsea isolation valve (SSIV) structure at Britannia, housing production and gas lift system SSIVs and the umbilical termination assemblies; and
- Use of existing spare risers on the Britannia platform (×1) and BLP (×2) for the Fotla pipelines and umbilical.

The SFF wishes to emphasise significant concerns regarding this proposal. Given the level of fishing effort in the area, 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. These seabed conditions could lead to unpredictable interactions with mobile fishing gear, increasing the risk of snagging and damage as well as catch contamination.

SFF's detailed comments on the ES is as follows:

Pipelines Separation

Section 3.5.4 (p. 3-26) states that, to allow for installation tolerances, the two pipeline trenches will be installed approximately 40 m apart. The SFF is of the view that a **40 m separation is inadequate from a fishing-safety perspective**, as this distance poses a snagging risk to trawl doors when crossing the pipelines.

To minimise the likelihood of gear snagging and to provide a safer and more practical clearance for fishing operations, the SFF **recommends increasing the minimum separation to 50 m**.

Positioning and Anchoring of the MODU ***Environmental and Safety concerns***

The SFF notes from Section 4.5.2 (p. 4-6) that, *"for the purposes of the Environmental Impact Assessment (EIA), it is assumed the MODU will be held in position using eight anchors. Given the local water depth at Fotla, the mooring lines are expected to extend approximately 1,450 m from the MODU, with around 750 m of each anchor chain lying on the seabed. The exact length of chain on the seabed may vary slightly depending on the rig. It is also noted that the anchors and chains will be pre-laid using up to two anchor-handling vessels, with their seabed locations marked by buoys until the MODU arrives on site."*

The SFF has significant concerns regarding the environmental effects of leaving approximately 750 m of anchor chain resting on the seabed. Such chains can create depressions and scour that alter the seabed profile, and we expect these impacts to be fully addressed at decommissioning. In our view, any such seabed disturbance should be mechanically backfilled to restore safe and navigable conditions for fishing activity.

We also note the proposal to pre-lay anchors and chains and mark them with **buoys**. This creates safety risks for fishing vessels, particularly given recurring incidents where buoys fail, drift, or break down. To minimise the risk of gear snagging and ensure fishing safety during this period, the SFF recommends the use of a dedicated guard vessel to alert fishers to the presence of exposed chains and associated hazards until the MODU is on location.

Drill Cuttings

The SFF notes from Table 4.7 (p. 4-11) the projected volumes of drill cuttings and drilling fluids generated per well. The table indicates that approximately **964 tonnes** of drillings muds and **2,031 tonnes** of cuttings will be discharged per well.

While the ES concludes that these discharges will have no significant effect, the SFF has concerns regarding the scale of these volumes. Such quantities of mud and cuttings have the potential to **foul productive fishing grounds, smother benthic habitat, and contaminate catches**, particularly for static gear sectors operating within or adjacent to the development area.

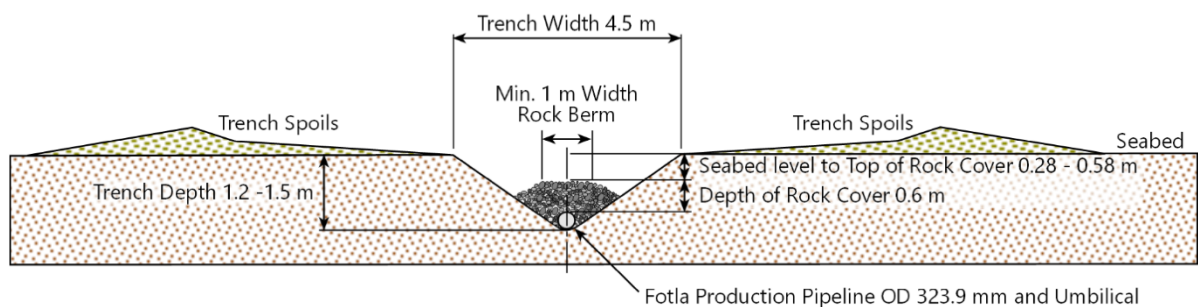
Given these risks, we consider the current impact rating to be underestimated. The SFF therefore proposes that the significance rating for drill cuttings discharges be increased to **“major”**, reflecting the genuine potential for adverse effects on fishing activity and the wider marine environment.

Snagging Hazards and Safety Risks

The SFF’s primary safety concern is the risk of fishing gear snagging on subsea infrastructure or alterations to the seabed:

Pipeline Protections

The SFF appreciates Ithaca's assumption 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 (Section 4.6.5 --p4-20). However 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 (p-13)”*.



Considering the trench spoils that will be deposited along both sides of the trench, and the fact that an open ditch of approximately **0.9 m** will remain after rock-dumping, the SFF is concerned that this configuration will create a **significant snagging risk** for trawl doors when crossing the pipelines. 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.

To minimise this risk and ensure the area is genuinely safe for fishing activity, the SFF **recommends that the trench be fully rock-dumped back to seabed level**, thereby removing the open ditch and providing a smoother, trawl-safe profile. Given Fotla is in lower energy environments, it may take a number of years to naturally backfill (ES, p9-7).

Concrete Mattresses

SFF notes in Section 1.1 (pp. 1–3) that concrete protection mattresses and grout bags are proposed to protect the spools and control jumpers. We also note that 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 SFF objects to the use of concrete mattresses, grout bags, rock bags, or similar protection measures in open waters due to the snagging hazards and wider safety risks they pose to the fishing industry. Our preferred method of protection remains the industry-standard approach: 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.

We welcome Ithaca's commitment to using rock protection at the crossing. However, we expect a clear commitment to the full removal of all concrete mattresses (and grout bags) at decommissioning, followed by a post-removal over-trawl survey to ensure no legacy safety risks are left for fishermen.

Mud Berms

The trenching of pipelines can leave behind mud berms (trench spoils) that pose a direct snagging hazard to towed gear. We acknowledge the commitment by Ithaca Energy to **liaise with the SFF** post-trenching to discuss and ameliorate these safety risks and propose that appropriate measures to be adopted to remediate snagging and/or catch contamination issues caused by the mud berms.

The SFF further notes the National Marine Plan (NMP) policy GEN 4: Coexistence, and Ithaca Energy's reference in Section 6.3.1.4 to compliance with this requirement. In this context, the SFF emphasises that the measures outlined under GEN 4 must be implemented in full, given the concerns raised by fishers and the importance of ensuring genuine and practical coexistence. This includes safeguarding fishing activity, minimising displacement, and enabling commercial fisheries to continue operating safely and sustainably alongside the proposed development.

Given this policy context and recognising that berms/trench spoils can create both snagging hazards and contamination risks for fishing operations, the SFF proposes the inclusion of multiple pipeline gates—similar to those implemented for the Finlaggan development and coordinated with the SFF. These gates would provide safer and more predictable crossing points for mobile gear vessels, thereby reducing disruption to fishers and supporting the developer's obligations under GEN 4 to facilitate safe and practical coexistence.

Need for Guard Vessel

Due to the potential snagging risks associated with seabed interactions during construction, the SFF proposes that any pre-lay crossing placement 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.

Fish and Shellfish Spawning and Nursery Grounds

The development area is a sensitive biological zone that overlaps with critical life stages of commercially important species:

Spawning Grounds: The Fotla Field falls within spawning areas for **cod, Norway pout, and *Nephrops***. We emphasise that cod spawning in this vicinity is categorized as "**recurrent**" with "**high intensity**". Given that peak spawning occurs between **January and April**, any noise or discharge disturbance during this window is of heightened concern and should be avoided. Considering cod is included in the OSPAR list of threatened and/or declining species and habitats (OSPAR, 2023).

Nursery Areas: The area serves as a year-round nursery for numerous Priority Marine Features (PMF), including **anglerfish (monkfish), blue whiting, herring, mackerel, and spotted ray**. The SFF expects strict adherence to mitigation measures to ensure no long-term loss of these vital fish stocks.

5.4 Socio-Economic Environment

Commercial Fisheries

The Environmental Statement concludes that the proposed Fotla Development will have *no significant effect* on commercial fisheries, and figure shows fishing effort in the immediate vicinity of Fotla can be considered low compared to the overall fishing effort in the wider area (Section 5.4.1).

The SFF cannot agree with this conclusion for the following reasons:

Landing Value and Data

The Fotla Field is located within **ICES statistical rectangles 44F1 and 45F1**, which are productive grounds for demersal species and shellfish. We note that between 2013 and 2023, the combined value of landings from these rectangles exceeded **£43.6 million**, with *Nephrops* (Norway lobster) being a particularly lucrative target. Additionally, SFF's plotter data shows fishing effort in the immediate vicinity of Fotla is high specially during summer months.

Project's Physical Impacts

The project will have the following impacts on commercial fishing operations:

Physical Displacement: The development will impose a **500 m statutory safety zone** around the Mobile Offshore Drilling Unit (MODU) for 180 days and around subsea infrastructure for the 15-year life of the field. In addition to impacts on the demersal fleet, this also affects **pelagic fisheries**, as pelagic vessels often interact with the seabed when targeting species such as herring.

Anchor Spread Concerns: While the statutory exclusion zone covers 0.785 km², the SFF remains concerned that the **MODU's 1,450 m anchor spread** will actually displace demersal gear from a significantly larger area—estimated at **6.6 km²**—for the duration of the drilling campaign. This creates a cumulative loss of ground that can reduce catch per unit effort (CPUE) for local vessels.

Cumulative effects: should take into account other oil and gas activity, cable routes, and wider spatial pressures on the fishing fleet.

Therefore, we propose that the **significance of effects be revised from “non-significant” to “significant.”**

We would also expect the ES to demonstrate how these risks have been meaningfully assessed and mitigated, and to set out clear commitments to minimise impacts on fishing activity—particularly in relation to seabed intervention methods, safety of navigation, and legacy seabed conditions post-decommissioning. Specifically, given the peak fishing season in the project area, we propose that construction activities be scheduled **outwith the summer months** to minimise disruption to fishing operations.

Accidental Events

The SFF notes from Section 15-7 (p. 15-3) that Ithaca places strong emphasis on preventing oil spills throughout the operational life of the Fotla Field. We acknowledge the commitment to stringent safety and operational procedures, and the mitigation measures and contingency planning described. Based on these measures, the ES concludes that the residual impact of a potential oil release would be *not significant*.

However, the SFF questions the validity of this conclusion from the perspective of the fishing industry. If an oil spill were to occur, even with low probability, the consequences for commercial fisheries would be immediate and significant. An incident of this nature would result in exclusion of fishing activity from the affected area, potential contamination of catches, reputational damage to seafood markets, and direct financial loss to the fleet.

The SFF notes that the Braer oil spill in the 1990s resulted in the closure of fishing grounds for approximately three weeks; however, the impacts did not end when the area was reopened. Fishers were further penalised because buyers remained cautious about purchasing catches from the area due to concerns over possible contamination. This demonstrates that the effects on commercial fisheries extend well beyond the initial closure and can have ongoing economic consequences even after restrictions are lifted.

In light of this, it would be unrealistic to categorise such impacts as “Not Significant”, given the clear precedent showing both short- and long-term socio-economic harm to fishing communities. Given the scale of these potential impacts, and the fact that fishermen would bear the economic consequences of an event entirely outside their control, the SFF considers it essential that precautionary compensation arrangements for fisheries are clearly defined. Such measures are necessary to safeguard fishing businesses in the event of an accidental release, ensuring that the sector is not left exposed to disproportionate risk.

ENVID Matrices

The SFF notes from *Table 2: Fotla field development subsea and pipeline installation ENVID matrix (P A.3-4)* that the fishing industry has not been scoped in for the following items:

Item 7: Rock dumping protection of production pipeline or other infrastructure.

Item 8: Laying of concrete mattresses, grout bags etc for protection of infrastructure.

Item

Considering the above items impacts on Commercial Fisheries, we would like to enquire why “**other users of the sea**” have not been included and **Commercial Fisheries have not been scoped in**. Given the clear and demonstrable interactions between the proposed activities and fishing operations, the SFF recommends that **Commercial Fisheries be explicitly scoped into this assessment**.

Decommissioning

The SFF notes from Section 4.9 that before cessation of production (CoP), a decommissioning plan will be developed based on industry best practice and guidance in consultation with the relevant statutory authorities.

We appreciate the Operator's intention to leave the seabed in and around the development area in a condition that poses no harm to the marine environment or to other users of the sea. However, to provide fishers with confidence that it is genuinely safe to resume fishing activities post-decommissioning, the SFF **strongly recommends that an over-trawl sweep be undertaken**. Only through an over-trawl verification can fishermen be assured that no legacy snagging hazards remain on the seabed and that fishing can safely resume in the area.

Legacy Effects

Given the expected disruption to fishing activity and the potential snagging and catch-contamination risks arising from the Fotla Field development, the SFF expects a firm commitment from the Operator that there will be an ongoing obligation to remediate any snagging incidents or related issues raised by fishers. This assurance is essential to maintain safety, protect fishing gear, and ensure that the impacts of the development are properly addressed throughout its operational and post-installation phases.

In conclusion, SFF's main objective is to protect and promote its constituent member associations interest. Therefore, we propose that the safety of our members is ensured, and their operations are not disrupted throughout and post any offshore oil and gas developments.

The Federation having stated the above position, would reaffirm its appreciation of the ES provided and its wish to work closely and positively with the Ithaca Team, as they work through the challenges before you.

Yours sincerely,

A black rectangular box redacting the signature of the Scottish Fishermen's Federation.

Scottish Fishermen's Federation