



2025 Environmental Report

INEOS E&P (UK) LIMITED



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Title:

INEOS E&P (UK) Limited

2025 Environmental Report

Notes:

Revision Record:							
				R Bak Lange	Operations Director	Signed by: René Bak Lange	24 april 2026
1	31/03/2026	M Reynolds	JA	P Jones	Head of SHEQ	Signed by: P Jones	09 April 2026
0	25/03/2026	M Reynolds	PJ	-	-	Signed by: M Reynolds	-
Rev.	Date Prepared	Author	Chk'd	Name	Title	Signed	Date App'd
Document Origination			Check	Document Approval for use by INEOS Energy			
The master original of this document is held by:					SHEQ Department		



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Glossary

BMS	Business Management System
EMS	Environmental Management System
HSE	Health and Safety Executive
ISO	International Standards Organisation
NPAI	Not Permanently Attended Installation
OCNS	Offshore Chemical Notification Scheme
OPEP	Oil Pollution Emergency Plan
OSPAR	Oslo Paris convention for the protection of the marine environment of the NE Atlantic
OPRED	Offshore Petroleum Regulator for Environment and Decommissioning
PLONOR/ PLO	Poses Little or No Risk to the environment
PON1	Petroleum Operations Notice 1
PWT	Produced water treatment plant
SHE	Safety, health and environment
SHEMS	Safety, Health and Environment Management System
SNS	Southern North Sea
SUB	Chemical is a candidate for substitution
VOC	Volatile Organic Compounds

1 Introduction

This document is the 2025 Environmental Report for INEOS E&P (UK) Ltd (hereafter referred to as 'INEOS'), detailing the offshore operations conducted throughout the year.

As a public statement, this report is designed to:

- Outline the scope of the company's offshore activities;
- Provide an overview of the INEOS Environmental Management System (EMS);
- Present the company's environmental policy, along with its goals, objectives and targets; and
- Summarise performance achievements for 2026.

This document is the eleventh annual Environmental Report to be issued as a public statement by INEOS E&P (UK) Limited.

2 Scope of Activities

This Section summarises activities undertaken in 2025.

2.1 Overview of INEOS

INEOS Group is a global manufacturer of petrochemicals, speciality chemicals and oil products. Comprising 29 individual businesses, INEOS operates across 154 sites in 27 countries. The group generates annual revenues of approximately \$55 billion.

In 2025, INEOS was the operator of the Breagh and Clipper South gas production fields located in the Southern North Sea (SNS).

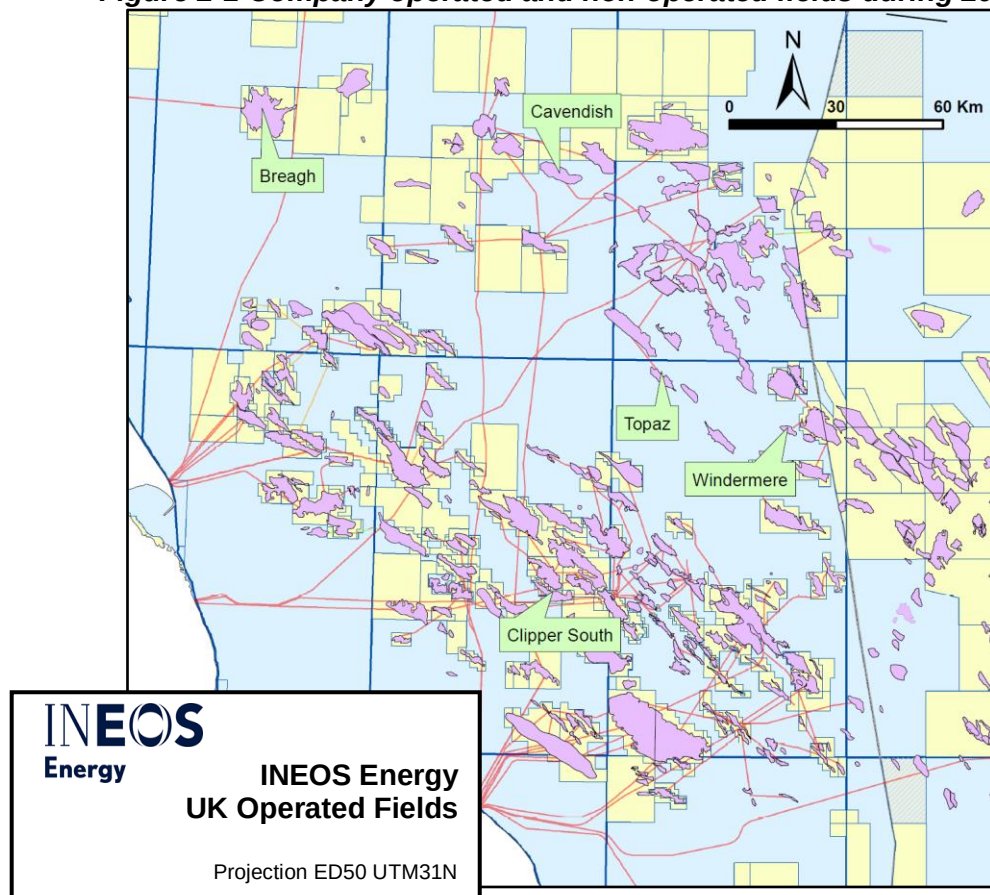
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2.2 Location of Offshore Activities during 2025

The locations of INEOS operated fields are shown in Figure 2.1 below.

Figure 2-1 Company operated and non-operated fields during 2025



¹ Since 7th April 2026

2.2.1 Production Operations

2.2.1.1 Breagh

The Breagh A platform is situated in SNS Block 42/13a, approximately 65 km off the UK coast, in a water depth of 62m. Installed in late 2011, the platform began production in October 2013. It is a Not Permanently Attended Installation (NPAI), with maintenance visits typically one week in every four.

In 2025, INEOS managed the Breagh platform for production purposes. Two wireline interventions were conducted on the Breagh A platform in May and September to close the velocity string sliding doors.



2.2.1.2 Clipper South

Production at the Clipper South platform commenced in August 2012. The platform is located within SNS Block 48/19, positioned in a water depth of 23.5 meters. It is operated as an NPAI, with maintenance visits typically lasting six days per month.

Initially, Clipper South exported gas via the ConocoPhillips-owned LOGGS platform. However, following its decommissioning in October 2018, a new pipeline was established to connect Clipper South to the Shell-owned Clipper platform. Additionally, a produced water treatment plant was installed in 2018 to manage the liquid handling requirements at the Clipper platform.



2.2.2 Other Operations

All other operations have been fully decommissioned.

3 EMS Summary

This Section provides a brief description of the company's Environmental Management System (EMS) as it operated in 2025.

3.1 Introduction

The EMS serves as a critical component of the overarching Business Management System (BMS). It defines the organisational framework, planning activities, responsibilities, procedures, business processes and resources necessary for developing, implementing, reviewing and maintaining the environmental policy.

The EMS is a tool for identifying and managing the impact the business has on the environment. It works to reduce this impact by controlling the quantity of materials and energy used and the amount of waste produced. As well as facilitating the management of environmental impacts in a credible way, the EMS provides a practical tool to help evaluate and improve performance.

The following guiding principles and methodologies are incorporated into the OSPAR Strategy and integrated, as appropriate, into the EMS:

- the precautionary principle;
- the polluter pays principle;
- best available techniques and best environmental practice, including, where appropriate, clean technology;
- sustainable development;
- the application of an integrated ecosystem approach; and
- the waste management hierarchy, prioritizing avoidance, reduction, reuse, recycling, recovery, and residue disposal.

3.2 Verification

The offshore operations undertaken by the business have had ISO 14001 certification since 2010, which was first obtained by previous owners of the business and has continued through into INEOS ownership. This covers the management of all the company's exploration, drilling, development and production operations. Recertification was achieved in December 2025 (valid for 3 years).

3.3 Review

A formal review of SHEQ performance is conducted annually. This is an essential step required to assess the effectiveness of the SHEMS in achieving the aims of the company's policy and objectives and to achieve continuous improvement in the control system.

The review process enables the company to:

- review progress against existing objectives and targets;
- consider evidence of performance, such as audits and other reports;
- consider the sufficiency of the organisational structure, the available resources, the policy and the management system in general; and
- agree new objectives and targets.



Internal auditing is used to objectively investigate how each element of the management system is being applied. Internal audit reports provide input to management review, along with other performance indicators.

4 Environmental Policy

This Section provides a brief description of the company's environmental policy, including relevant environmental goals, objectives and targets set for significant environmental aspects and impacts.

4.1 Introduction

In line with the OSPAR Strategy, the company has established an environmental goal of protecting and conserving the maritime area against any potentially adverse effects resulting from its activities. To achieve this goal, programmes and measures to identify, prioritise, monitor and prevent/reduce/eliminate any emissions, discharges or losses of substances which could cause pollution, have been developed.

Non-polluting activities, that may have potentially adverse effects on the ecosystems and biological diversity of the maritime area, include exploration activities and the installation or decommissioning of structures, cables and pipelines.

4.2 SHE Policy Statement

The components of the SHE Policy Statement that relate to environmental management are stated in the remainder of this Section.

The Company recognises its moral and legal obligations to conduct all activities in a manner which protects the natural environment with the prevention of pollution. All employees are required to act responsibly to protect the environment.

In relation to environmental management, the company will:

- annually set SHEQ objectives, seeking to achieve continual improvement;
- ensure that a competent workforce is established and receives all necessary information, instruction and training and that all personnel have a clear understanding of their roles and responsibilities;
- provide all personnel with opportunities for participation in SHE decisions, risk assessments and aspects of SHE management as well as undertaking consultation and communication regarding SHE issues;
- monitor and record SHEQ performance and assess compliance through internal audits;
- annually conduct management review of performance against objectives, including review and development of the Policy and BMS and communicate the results of this review with the workforce;
- ensure that sufficient resources are provided to achieve its objectives.

For all business activities and projects, the company will:

- comply, as a minimum, with all SHE legislation applicable in the UK, to discharge its Duty of Care, applying best industry practice and undertaking steps to improve safety or environmental protection levels where appropriate
- ensure that systematic hazard identification, assessment of risk and incorporation of measures to minimise and control risks are central to all our activities;
- apply all necessary control measures in the design, construction and operation of offshore facilities to prevent the occurrence of major accident events;

- select competent contractors with regard to their SHEQ management capability and provide them with all necessary information, including definition of INEOS's SHEQ requirements;
- monitor and audit contractors as necessary to ensure satisfactory quality assurance and SHE performance; and
- maintain emergency and contingency plans.

The company requires each of its contractors and suppliers to:

- operate effective SHEQ management systems; and
- comply with INEOS's SHEQ requirements including appropriate SHEQ planning, hazard identification, risk control, performance monitoring and reporting.

4.3 Objectives and targets for 2025

The environmental management objectives and targets for the period between January and December 2025 were determined to progressively achieve the commitments set out in the SHEQ Policy Statement. Section 5.2 provides further detail.

5 Performance Summary

This Section provides a summary of performance in relation to compliance with relevant legislative requirements and compliance with the environmental policy, goals, objectives and targets. A summary of offshore environmental aspects, and their associated emissions and impacts, is also provided.

5.1 Introduction

The company's internal and external auditing processes enabled reporting on the areas of environmental performance defined in Section 4, Environmental Policy, i.e. the extent to which the environmental goals listed below have been achieved:

- compliance with current legislation;
- progress made in achieving environmental goals; and
- continual improvement in environmental performance.

5.2 2025 Environmental Performance Summary

Progress against the identified objectives and targets for 2025 is considered in the annual Management Review. Key objectives and targets are related to incidents, BMS development and certification, competence, emergency preparedness and response, audit and review and the offices. In 2025, all objectives were achieved and the audit schedule continued throughout the year to ensure that progress against objectives and targets is maintained.

5.2.1 Production Activities

Production operations during 2025 were undertaken at Breagh and Clipper South.

5.2.1.1 PON1 Incidents

On the 13th of February 2025, a PON1 incident occurred on the Breagh platform, resulting in the discharge of approximately 960kg of Methanol to sea via a fault on the 'dump valve' from the methanol system. The fault was promptly rectified.

5.2.1.2 Chemical Use and Discharge

During 2025, methanol (**category E, PLO**) was used by the Breagh platform to prevent hydrate formation during well start up. The methanol is used in a dosing system; it is stored in a tank and then transported back to shore with production. Similarly, Monoethylene Glycol (all dilutions) was used as part of the well intervention work during 2025 in May and September. It was returned to the platform where it was stored before returning onshore for treatment. SOBO S Gold 08 was permitted but not used during 2025.

During 2025, two products were used regularly for Clipper South operations: corrosion inhibitor, CORR2617A, Champion X (OCNS colour band Silver); and, Gas Hydrate Inhibitor, Monoethylene Glycol (All dilutions), Champion X (category E, PLO). These products prevent corrosion in the pipeline between Clipper South and its host platform. These products are not discharged during normal operations. Additionally, SOBO S Gold 08 (Oil Technics Ltd) is also permitted, but none was used during 2025.

Table 5-1 below presents the quantities of chemicals used and discharged at Breagh and Clipper South during 2025 based on label and ranking categories.

Table 5.1 Summary of Chemical Types Used and Discharged during normal platform operations

OCNS category or colour band ranking	Additional Label	Quantity (kg)	
		Use	Discharge
Breagh			
E	PLONOR	3713	12
E	PLONOR	882	0
Gold	-	0	0
Clipper South			
E	PLONOR	5155	0
Gold	-	0	0
Silver	-	17724	0
Total			
E	PLONOR	9750	12
Gold	-	0	0
Silver	-	17724	0

5.2.1.3 Produced Water Discharges

The Breagh platform uses a closed production system and there are no separation facilities or disposal caissons; therefore, there are no discharges of produced water.

Clipper South is equipped with a produced water treatment (PWT) plant, designed to remove produced water prior to export to Clipper. Table 5-2 provides details of the volume of water discharged from the PWT plant, along with the sampling results of the treated and discharged water.

Table 5.2 Clipper South PWT Discharge Results

Month	Total Volume of Water Discharged (m ³)	Average Oil in Water (mg/l)	Weight of Oil Discharged (t)
January	9549	5.65	0.054
February	8014	7.69	0.062
March	10096	8.89	0.090
April	10046	8.30	0.083
May	8813	6.16	0.054
June	8939	7.80	0.070
July	0	0	0.000
August	4287	13.95	0.060
September	9218	12.30	0.113
October	7724	7.44	0.057
November	6608	7.91	0.052
December	3117	8.24	0.026
Total	86411	-	0.060

5.2.1.4 Waste

In 2025, Breagh and Clipper South collectively generated 61.3 tonnes of waste, with Breagh producing 22.27 tonnes and Clipper South producing 70.66 tonnes. Most of the waste from both platforms was either recycled or converted into energy. A very small portion of waste was directed to landfill, incinerated or sent for treatment. A summary for Breagh and Clipper South is provided in Table 5.3 and

Table 5.4, respectively.

Table 5.3 Summary of Group I-II Waste from Production Operations from Breagh (tonnes), 2025

Group	Type	Reuse	Re-cycling	Waste to Energy	Incinerate	Landfill	Other	Total	Comments
Group I	Chemicals / Paints	0	0.020	1.53	0.025	0	0	1.575	
	Drums / Containers	0	0.101	0	0	0	0	0.101	
	Oils	0	2.925	0	0	0	0	2.925	
	Misc	0	1.912	0.259	0	0	0.9	3.071	Treatment
	Sludges/ Liquids/ Washings	0	0.850	0	0	0	0.6	0.850	Treatment
Group II	Chemicals / Paints	0	0.035	0	0	0	0	0.035	
	Drums / Containers	0	0	0	0	0	0	0	
	Scrap Metal	0	5.19	0	0	0	0	5.190	
	Segregated recyclables	0	3.947	0	0	0	0	3.947	
	General	0	1.095	2.710	0	0.08	0.683	4.568	Treatment
	Sludges/ Liquids/ Washings	0	0	0	0	0	0	0	
Group III	Asbestos	0	0	0	0	0	0	0	
	Radioactive materials (exc. NORM)	0	0	0	0	0	0	0	
	Clinical	0	0	0	0.005	0	0	0.005	
	Explosives	0	0	0	0	0	0	0	
Total		0	16.075	4.499	0.03	0.08	1.583	22.267	

Table 5.4 Summary of Waste from Production Operations from Clipper South (tonnes), 2025

Group	Type	Reuse	Re-cycling	Waste to Energy	Incinerate	Landfill	Other	Total	Comments
Group I	Chemicals / Paints	0	0.790	25.59	0	0	0	26.38	
	Drums / Containers	0	0.462	0	0.050	0	0	0.512	
	Oils	0	1.694	12.71	0	0	0	14.404	
	Misc	0	1.251	0.079	0	0	0.055	1.385	Treatment
	Sludges/ Liquids/ Washings	0	0.810	0	0	0	0.6	0.810	Treatment
Group II	Chemicals / Paints	0	0.030	0	0	0	0	0.030	
	Drums / Containers	0	0	0	0	0	0	0	
	Scrap Metal	0	1.96	0	0	0	0	1.960	
	Segregated recyclables	0	2.347	0	0	0	0	2.347	
	General	0	2.608	3.742	0	0.08	0.672	7.102	Treatment
	Sludges/ Liquids/ Washings	0	0	15.72	0	0	0	15.72	
Group III	Asbestos	0	0	0	0	0	0	0	
	Radioactive materials (exc. NORM)	0	0	0	0	0	0	0	
	Clinical	0	0	0	0.005	0	0	0.005	
	Explosives	0	0	0	0	0	0	0	
Total		0	11.950	57.841	0.055	0.08	0.727	70.655	

In addition to the above wastes, the liquid waste generated at the Breagh platform during routine maintenance visits was minimal, comprising small volumes of wastewater from sinks and showers, along with sewerage from toilets, which was discharged to sea. The Clipper South platform has a macerator to process all black waste. The small portion of domestic waste generated during NPAl visits is separated, bagged and then transported onshore for disposal. As per company policy, no rubbish, including plastic, is permitted to be disposed of overboard.

5.2.1.5 Atmospheric Emissions

The Breagh and Clipper South platforms operate with self-sufficient power supplies using standalone diesel generators. Operational emissions to air from the combustion of diesel fuel to power these generators is summarised in Table 5.5 below.

Table 5.5 Emissions to Air from Breagh and Clipper South, 2025

Asset	Diesel used (t)	Emissions to Air (tonnes)							
		CO ₂	NO _x	N ₂ O	SO ₂	CO	CH ₄	VOC	CO ₂ e*
Breagh	57.6	184	3.4	0.01	0.23	0.90	0.01	0.12	188
Clipper South	126.7	406	7.5	0.03	0.51	1.99	0.02	0.25	414

* CO₂e value shown is a combination of the CO₂, N₂O and CH₄ emissions.

Additional atmospheric emissions associated with production operations at Breagh and Clipper South were generated through the combustion of fuel by the helicopters and supply/standby vessels used during planned maintenance visits.

In addition to the above, emissions to air from operational facilities arose from the manual venting of produced gas during maintenance activities. The calculated emissions of direct gas from operational facilities in 2025 due to maintenance venting are shown in Table 5.6.

Table 5.6 Gas vented in 2025

Asset	Gas vented (t)	CO ₂ e*
Breagh	2.10	46.7
Clipper South	0.54	13.6

* CO₂e value shown takes account of gas CO₂ and CH₄ composition.

5.2.1.6 Oil Spills

Oil Pollution Emergency Plans (OPEPs) were in place to cover all operations at Breagh and Clipper South during 2025. Each OPEP lists the required offshore and onshore actions and responses, defines roles and responsibilities in the event of an oil spill and provides a risk assessment.

5.2.2 Other Activities

No additional activities took place in 2025 outside of production.